



**Cranbook Plan**  
**Examination in Public**  
Matter 12  
Hearing Position Statement

**Boyer**

**CRANBROOK PLAN**

**EXAMINATION IN PUBLIC**

**MATTER 12: EMPLOYMENT LAND PROVISION**

**BOYER ON BEHALF OF MR & MRS PYLE / HARROW ESTATES PLC**

**REP ID: 144**

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## **1. INTRODUCTION**

- 1.1 This Hearing Statement has been prepared by Boyer (Development Economics) in relation to Matter 12 Issue 18 of the Examination of the Cranbrook Plan (CP), which relates to Employment Land Policies CB2 to CB5. East Devon District Council (EDDC) is producing this Local Plan document.
- 1.2 Boyer has been instructed jointly by Harrow Estates PLC and Mr and Mrs Pyle (Landowners, Treasbeare Farm) to review the proposed policies and its requirements for the provision of employment land.
- 1.3 This Statement reviews the policies and relevant supporting evidence and respond where appropriate and relevant to the Inspectors questions on Employment Land.

## 2. PROPOSED POLICIES CB2 TO CB5 AND SUPPORTING DOCUMENT

2.1 Policies CB2 to CB5 cover the four main expansion areas at Cranbrook, namely:

- CB2 Bluehayes Expansion Area - 40 hectares allocated for a mixed-use development.
- CB3 Treasbeare Expansion Area - 62 hectares allocated for a mixed-use development.
- CB4 Cobdens Expansion Area - 110 hectares allocated for mixed-use development.
- CB5 Grange Expansion Area - 30 hectares allocated for mixed-use development.

2.2 Whilst the policies are all very similar, only CB3 sets out a specific and individual quantum of employment land as being a requirement (4.9 hectares). The other allocations make reference to a mixed-use area to incorporate 'a range of business space or premises'. Policy CB3 also includes the mixed-use area aspect and this is expected to provide a 'range of business space and premises' in addition to 4.9 hectares of employment land.

2.3 Supporting text to all policies CB2 to CB5 in addressing the detail of these mixed-use areas advises that:

*'Within the mixed-use area there is a requirement for business space to be provided. Although no minimum floor space for business use is set in this policy, the Cranbrook Economic Development Strategy looks to deliver 18.4ha of land across the Town and Neighbourhood Centres and the allocated employment land, which this Plan secures. Applicants will be required to demonstrate how their proposals for development in the mixed use area delivers on the objectives of the Cranbrook Economic Development Strategy in relation to the provision of business floor space.'*

2.4 The Proposals Map identifies two parcels of land within Policy CB3 as employment land allocations.

2.5 The Cranbrook Economic Development Strategy (CEDS) referred to in the supporting text to Policies CB2 to CB5 is not in our view a conventional employment land allocation justification document and it provides very limited technical analysis of employment land need and supply by B class use.

2.6 Instead, the CEDS seeks outline a strategy which is to guide Cranbrook's future employment growth given its particular local circumstances and characteristics.

2.7 The approach to quantifying employment floor space need within the CEDS is based primarily upon anticipated jobs by broad sector taking account of 'retail/town centre' and 'education and health'; then land need for 'office/warehouse/industrial' employment. However, the methodology adopted in the CEDS is unclear and there is no explanation as to how either the jobs totals or land requirements have been calculated.

- 2.8 The CEDS considers three alternative options for future employment need in Cranbrook. It selected the option that reflected the expanded town meeting its own needs for local services while accepting the reality of some out-commuting to nearby strategic employment locations. This alternative took forward employment need based on Cranbrook requiring half the level of employment provided in an 'independent Devon market town'. Whilst this does appear to be a reasonably logical and sensible approach, the empirical analysis to justify the actual job and land need for the chosen option is not provided.

### 3. THE INSPECTOR'S QUESTIONS

3.1 The Inspector for the Cranbrook Plan has posed a number of questions in relation to Employment Land (Matter 12 / Issue 18). The overarching question is whether the Local Plan is positively prepared, justified and effective in respect of Employment Land Policies CB2 to CB5.

3.2 To establish this, a number of other queries that need to be answered (Question 148-151 and Additional Question 18):

- Q148. Does the allocation of land for employment when taken together with the expansion areas in CB2 to CB5 amount to the 18.4 hectares set out in the EDLP?
- Q149. How would the employment land set out in Strategy 12 of the EDLP be secured through the phasing programme? Through what mechanism will it be delivered?
- Q150. What has been the take up on Phase 1 at Cranbrook of residents working and living in the Cranbrook Settlement?
- Q151. What evidence is there to indicate that employment provision would sustain the settlement at Cranbrook and deliver sustainable development?

3.3 Additional Question:

- AQ18. Are any Main Modifications proposed in relation to Issue 18?

3.4 Our clients, Harrow Estates and Mr and Mrs Pyle, are particularly interested in making representations in relation question 148 but also make observations and comments in respect of the other questions and employment matters generally.

**Question 148 - Does the allocation of land for employment when taken together with the expansion areas in CB2 to CB5 amount to the 18.4 hectares set out in the EDLP?**

3.5 We have attempted to reconcile the identified 18.4 hectares employment land with the allocations across CB2 to CB5. Save for the specifically identified 4.9 hectares of employment land identified in CB3, there are no other dedicated employment land allocations.

3.6 CB2 to CB5 refer to the inclusion of business space and premises within the mixed-use areas, however there is no floorspace or land expectation attached to any of these allocations.

3.7 The Councils Economic Development Strategy for Cranbrook does provide (at Section 5.6 on pages 20 and 21) an employment breakdown for Cranbrook (covering both jobs and land) which identifies a total of 18.4 hectares for B-class and non-B-class uses by 2030. The B-class element of this total is 8.7 hectares.

- 3.8 However, we have raised questions regarding the lack of clarity over the methodology used for these calculations and the lack of any empirical evidence to justify the job and land need outcomes taken forward.
- 3.9 Whilst we do recognise the difficulties with employment forecasting, it is felt that the approach taken to employment land allocations at Cranbrook is neither justified nor consistent across the four expansion areas. There is no evidence or justification for the specific allocation in CB3 of 4.9 hectares of employment land.

#### **Other Employment Land Observations**

- 3.10 Whilst we consider that the Inspector's other questions related to Employment Land are primarily for the Council to respond to, we feel it is important to make the following related observations.
- 3.11 It is important to recognise the overall job numbers that can be achieved in Cranbrook and not just have a focus upon B-Class employment. The jobs created from retail, retail service, education, healthcare, care home, leisure, community uses, services and sui generis uses are important and will provide for flexible and part-time jobs. By focusing such uses within a town centre or 'mixed-use area' sustainable development can be secured. Co-location of uses achieves more sustainable patterns of travel and this can in-turn encourage related support businesses to become established including other support and service businesses; smaller scale/start-up office space; and flexible space to suit the needs of growing businesses.
- 3.12 Moreover, the CEDS has not adequately considered the very significant level of employment (B-Class) floorspace that is committed and will be brought forward at Skypark and Exeter Science Park, which are very close to Cranbrook. In addition, proximity to Exeter with its strong office and warehousing market will be a factor that will limit indigenous employment and the ability of Cranbrook to attract businesses to set up.
- 3.13 Skypark and Exeter Science Park benefit from Enterprise Zone status that makes these locations financially very attractive to businesses both large and small. Their enhanced status will have a detrimental impact upon private sector led development and delivery of B-Class employment in Cranbrook's expansion areas in the medium and potentially longer term.

## **4. CONCLUSION**

- 4.1 In summary, the specific allocation of 4.9 hectares of employment land in CB3 has not been justified and this is at odds with the position taken on CB2, CB4 and CB5.
- 4.2 In addition, the Cranbrook Economic Development Strategy does not provide a sufficiently explained or justified evidence base upon which to plan for the employment needs of Cranbrook. The strategy document is essentially a vision document that presents ideas and identifies opportunities, which an expanded Cranbrook could seek to capitalise on to support its employment needs.