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Exeter  
EX1 1TL

r 18001

Angela King,  
Planning Policy Section,  
East Devon District Council,  
Blackdown House,  
Border Road,  
Honiton,  
EX14 1EJ.

16 October 2020

Delivered by email to: ([planning.policy@eastdevon.gov.uk](mailto:planning.policy@eastdevon.gov.uk))

Dear Angela,

**MLPD 18001 Representations on Farringdon Neighbourhood Plan Regulation 16  
Consultation for Stuart Partners Ltd**

**Background**

We represent Stuart Partners Ltd (“client”) which has in excess of 1,000 acres in the vicinity of Farringdon parish (with more than 500 acres in Farringdon parish alone) and which owns and controls the strategically important Hill Barton Business Park, more than half of which is in Farringdon parish.

Stuart Partners Ltd, is a local company with a diverse business portfolio based around agriculture, land, renewable energy and employment delivery all contributing considerably in excess of 1,000 jobs and £100 Million Gross Value Added (GVA) into the East Devon and sub regional economies.

Two thirds of East Devon district is covered (rightly) in restrictive national planning policy designations. The Council has abandoned the Greater Exeter Strategic Plan (GESP) meaning that there is no forthcoming strategic planning policy framework for the area. The Local Plan is 5 years old and must now be reviewed. And the Council's higher tier decision taking concludes that this area is ***“the least constrained part of the district for accommodating... [strategic housing and employment]... growth... [because it is]...land..[which]...is relatively flat with no landscape designations...[and which]... is well served by main roads with good vehicle access via the M5, A30, A3052 and A376 and has good existing public transport links with the railway line and existing bus routes...”***

### **Farringdon Neighbourhood Plan**

Set against this the Farringdon NP attempts to reinforce restrictions on development in arguably the only area in the district capable of taking strategic growth without significant harm.

### **Objections to Farringdon NP Policies Farr 2 and Farr 6**

It is arguable as to whether the policies comply with the “basic conditions” outlined in the National Planning Policy Framework (NPPF), however, and unfortunately, our client is **objecting** to:

- **Farr 2** (to do with protecting rural character);
- **Farr 6** (to do with, amongst other things, trying to prevent the expansion of the strategically important and successful Hill Barton Business Park. From work our client has commissioned (SMA on highways; APG on landscape impacts, and Green on ecology) and which now underpins a planning application made by our client to expand Hill Barton Business Park, we know that there are no technical reasons as to why Hill Barton should not be allowed to expand<sup>1</sup>)),

for the following reasons:

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<sup>1</sup> Additionally, following consultancy input and preapplication advice from the relevant authority, our client has submitted a screening opinion request to Devon County Council (DCC) for the expansion of the inert Hill Barton landfill site.

- The source of these “daughter” policies is the “mother policy” Local Plan Policy E7 - Extensions to Existing Employment Sites Outside Built-up Area Boundaries which states that it (the policy) “*will not apply to Hill Barton*”.
- Instead a lower tier policy document (the adopted “Villages Plan”) was left to deal with a strategically important business park, and it fails to adequately do so.
- It is our client’s position that the documents (combined) attempt to artificially, and without evidence or justification, stop sensitive expansion at Hill Barton.
- The Council itself accepts that land in and around Hill Barton is suitable for development, agreeing recently that it is “*the least constrained part of the district for accommodating... [strategic housing and employment]... growth... [because it is]...the land..[which]...is relatively flat with no landscape designations...[and which]... is well served by main roads with good vehicle access via the M5, A30, A3052 and A376 and has good existing public transport links with the railway line and existing bus routes...*”
- Whatever the reasons for the Council attempting to artificially curtail Hill Barton via previous policy documents, such an approach was inappropriate and unjustified, exemplified in the conclusions of reporting underpinning a planning application for the expansion of Hill Barton Business Park recently made by our client; the conclusions being that sensitive expansion should be supported and can occur without harm; and most certainly expansion need not be curtailed.
- The expansion of Hill Barton development is supported by national and local policies.

## **Conclusions**

Especially because:

- Two thirds of East Devon district is covered (rightly) in restrictive national planning policy designations;

- The Council has abandoned the Greater Exeter Strategic Plan (GESP) meaning that there is no forthcoming strategic planning framework in the area;
- The Local Plan is 5 years old and must now be reviewed; and,
- The Council's higher tier decision taking concludes that this area is ***“the least constrained part of the district for accommodating... [strategic housing and employment]... growth... [because it is]...land..[which]...is relatively flat with no landscape designations...[and which]... is well served by main roads with good vehicle access via the M5, A30, A3052 and A376 and has good existing public transport links with the railway line and existing bus routes...”***

we respectfully, suggest that the Farringdon NP must be made to acknowledge that the parish is in an important location in the sub-region making up part of an area which is long recognised by the Council and its partners as the most sustainable option for accommodating future sub-regional strategic housing and employment needs, balancing environmental impacts with necessary social and economic gains.

Hill Barton Business Park is strategically important in East Devon and the sub-region and its growth cannot be artificially curtailed.

Unfortunately, on the foregoing basis our client **objects** to **Farr 2 and Farr 6**.

Thank you.

Yours sincerely

James

**James McMurdo MRTPI MRICS**  
Director  
For and on behalf of McMurdo

Copies: Client; Farringdon NP

## Farringdon Neighbourhood Plan

### Submission Version Representation Form

The Farringdon Neighbourhood Plan has been prepared by Farringdon Parish Council.

It has now been formally submitted to East Devon District Council who are legally required to undertake public consultation. The consultation closes on **20<sup>th</sup> October 2020**.

Please use this form to make representations (comments) on the Plan.

#### Using this form

Please use a separate form must be completed for each representation

Please ensure your name or organisation is stated on each page.

Please note we cannot accept anonymous responses. Your name, address and your comments will be made publically available on our website. Other personal details (signature, personal email address and telephone number will not be visible).

Return your completed form(s) and any additional information to East Devon District Council:

By email: [planningpolicy@eastdevon.gov.uk](mailto:planningpolicy@eastdevon.gov.uk)

By post: Angela King, Planning Policy team, East Devon District Council,  
Blackdown House, Border Road, Heathpark Industrial Estate, Honiton, EX14 1EJ

Please note representations received after 20<sup>th</sup> October 2020 will not be accepted.

#### Data Protection

Any personal information which you provide will be held and used by East Devon District Council for the purpose of producing the neighbourhood plan and may inform other Planning Policy work. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. The content of your representation including your name and address will be recorded electronically and made available our website. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the [Neighbourhood Planning Representations Privacy Notice](#) on the data protection pages on our website.

## **Part A – Personal Details**

Please enter your details as appropriate below. Please note your full name and address must be provided as a minimum. Please see page 1 for details on how we use your data.

### **Your Personal Details**

Title: Stuart Partners Ltd

First name: C/O Agent

Last name: C/O Agent

Job Title (where relevant): C/O Agent

Address: Hill Barton Business Park

Postcode: EX5 1DR

Telephone number: C/O Agent

Email address: C/O Agent

### **Your Agent's Details**

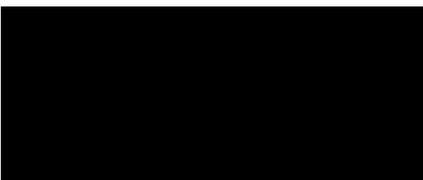
If you are using an agent, please fill in your title, name and organisation above and the full contact details of the agent below. Where applicable, an agent will be the point of contact for any correspondence.

Mr James McMurdo MRTPI MRICS

Director

McMurdo Land Planning and Development Ltd

a The Basement Office, 4 Baring Crescent, Exeter, EX1 1TL



## Part B - Representation Details

Enter Your Name/Organisation in the box below (Please state this on each sheet):

McMurdo for Stuart Partners Ltd

### Question 1

To which section of the Neighbourhood Plan does this representation relate?

Please state in the box below, the point of reference for your representation (this means the policy, paragraph or other reference no. if appropriate)

Please see attached letter

### Question 2

Please use the box below to explain why you are supporting or objecting to this part of the plan. If your comment relates to a specific area of land or site please identify it on a map if possible. Continue on a separate sheet if necessary.

Please see attached letter

Enter Your Name/Organisation in the box below (Please state this on each sheet):

McMurdo for Stuart Partners Ltd

**Question 3**

Please use the box below to say what changes would you suggest should be made to the plan?

It will be helpful if you are able to put forward your suggested revised wording of any policy or text or suggested alternative policy boundary. Please be as precise as possible and continue on a separate sheet if necessary

Please see attached letter

Enter Your Name/Organisation in the box below (Please state this on each sheet):

McMurdo for Stuart Partners Ltd

#### Question 4

If your representation is seeking a change to the Plan, do you consider it necessary to speak at the examination?

Please note if you select No your representation(s) will still be fully considered by the independent Planning Inspector by way of written representations.

Please delete as appropriate:

- ~~• No, I do not wish to speak at the examination.~~
- Yes, I wish to speak at the examination.

If you answered yes above and wish to speak at the examination, please outline in the box below, why you consider this to be necessary:

Our client, Stuart Partners Ltd, is a local company with a diverse business portfolio based around agriculture, land, renewable energy and employment delivery all contributing considerably in excess of 1,000 jobs and £100 Million Gross Value Added (GVA) into the East Devon and sub regional economies.

It has in excess of 1,000 acres in the vicinity of Farringdon parish (with more than 500 acres in Farringdon parish alone) and owns and controls the strategically important Hill Barton Business Park, more than half of which is in Farringdon parish.

Two thirds of East Devon district is covered (rightly) in restrictive national planning policy designations. The Council has abandoned the Greater Exeter Strategic Plan (GESP) meaning that there is no forthcoming strategic planning framework in the area. The Local Plan is 5 years old and must now be reviewed. And the Council's higher tier decision taking concludes that this area is ***“the least constrained part of the district for accommodating... [strategic housing and employment]... growth... [because it is]...the land..[which]...is relatively flat with no landscape designations...[and which]... is well served by main roads with good vehicle access via the M5, A30, A3052 and A376 and has good existing public transport links with the railway line and existing bus routes...”***

The NP (Farr 2 and Farr 6) tries to artificially restrict the expansion of Hill Barton Business Park.

Whilst our client accepts that the NP needs to align with the Local Plan we'd like to convey it's clear failings in the foregoing context to the Inspector, on behalf of our client, which has not been properly consulted, in person.

Please note this will not be regarded as a binding decision but will help us in our planning of the examination. The Inspector will ultimately determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination. If the Examiner does not consider it necessary to hold a public examination consideration will be given by way of written representations.

## Future Correspondence

Please indicate by deleting yes or no as appropriate, whether you wish to be notified of:

1. The publication of the recommendations of any person appointed to carry out an independent examination of the Farringdon Neighbourhood Plan? **Yes**
2. The adoption of the Farringdon Neighbourhood Plan? **Yes**

Enter Your Name/Organisation in the box below (Please state this on each sheet):

McMurdo for Stuart Partners Ltd

## Signature

Please sign and date your form in the box below.

Please note a signature is required by the Planning Inspectorate. If filling in the form electronically it can be an 'electronic signature' by typing in your name in the box. If you provide a handwritten signature we will ensure that it is not published on-line but it will be visible on the paper copies available at our offices and sent to the Inspector.

Signature:

James McMurdo MRTPI MRICS for Stuart Partners Ltd

Date: 16 October 2020