



Broadclyst Neighbourhood Plan

Submission Version Representation Form

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It has now been formally submitted to East Devon District Council who are legally required to undertake public consultation. The consultation closes at midnight on **8th September 2022**.

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

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

By email: 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

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Data Protection

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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:	Hallam Land Management/Taylor Wimpey UK
First name:	Ben
Last name:	Meynell
Job Title (where relevant):	
Address:	C/o Hallam Land Management, 3 Apex Court, Bristol
Postcode:	BS32 4JT
Telephone number:	See agent
Email address:	see 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.

Title:	
First name:	
Last name:	David Lock Associates (Nick Freer)
Job Title (where relevant):	Chairman
Address:	50 North Thirteenth Street, Milton Keynes
Postcode:	MK9 3BP
Telephone number:	██████████
Email address:	████████████████████

Part B - Representation Details

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

Hallam Land Management/Taylor Wimpey

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 number or other reference as appropriate)

Policy H2
Justification for Policy H2 (page 118)

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.

Hallam Land Management and Taylor Wimpey (HLM/TW) have for many years promoted, the western expansion of Cranbrook in close co-operation with East Devon District Council, and County Council as Local Highway Authority. The proposals are very advanced and subject of a live application (19/0620/MOUT) which sets out the access proposals for the Western Expansion area. These include a direct connection from Station Road to London Road through the western expansion area – in part to improve traffic conditions at the existing Station Road/London Road junction. The access proposals are supported by the County Council.

The western expansion of Cranbrook is allocated in the adopted East Devon Local Plan 2016 and in the Cranbrook DPD. The Inspectors Report on the Cranbrook Plan has now been published and affirms the allocation of land at Bluehayes - on the opposite (western) side of Station Road to the site set out in policy H. The need to progress with the delivery of the expansion areas at Cranbrook (including Bluehayes) is also reiterated - to meet the need for new homes and infrastructure.

The specific details of that access are set out in the live application most notably: WSP drawing No 51805-GA-008 "Proposed Access Arrangements" on East Devon's Planning website. Critically access into the western expansion area will be taken from a point on Station Road between St Peters Church to the north and Shercroft Close to the south. The alignment and priority on this section of Station Road are to be amended as part of the proposals.

HLM/TW have no objection in principle to the allocation of site H2 for the uses proposed in the Neighbourhood Plan – subject to a satisfactory access being capable of being achieved that does not prejudice the agreed access arrangements for the allocated Cranbrook Western Expansion site/Bluehayes. HLM/TW welcome the proposed connection to Bluehayes expansion area via the pedestrian and cycle lane

HLM/TW have considered Appendix 19 to the Neighbourhood Plan and in particular the selection process that the Neighbourhood Planning Body has undertaken. HLM/TW is mindful that site access does not appear to have been included in that assessment. Equally policy H2 appears to make no specific reference to vehicular access to the site - referring only to the active travel access (criteria 1) and a comprehensive scheme to follow linear development principles (2).

HLM/TW welcome the additional reference in Regulation 16 version to the need for the active access and linear development proposals to be "in alignment with the Bluehayes(Cranbrook western expansion area)". However it is unclear whether the development of site H2 as a whole, and the provision of vehicle access to it, is to be subject to the same general proviso that proposals should be designed in alignment with Bluehayes (Cranbrook western expansion).

In the absence of any apparent specific reference to vehicular access, it is anticipated by HLM/TW that access to the site will be obtained via the existing Cotterill Road – as appears to have been planned. Assuming that this is the case then to ensure that the proposal is robust and deliverable, Policy H2 should stipulate the access arrangements for the site. In the alternative HLM/TW consider that alternative wording to ensure that the allocation as a whole (including its access) is brought forward in alignment with the proposals for Bluehayes.

HLM/TW consider that such wording (spelt out more detail under question 3 below) is necessary to ensure that the basic condition of consistency with the strategic policies of the development plan - namely the delivery of the Bluehayes (Cranbrook western expansion) allocation as a matter of priority - is met.

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

Hallam Land Management/Taylor Wimpey

Question 3

Please use the box below to say what changes you would 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 as appropriate. Please be as precise as possible and continue on a separate sheet if necessary.

For the reasons set out above, most notably to ensure that Policy H2 is consistent with the strategic policies of the EDLP and Cranbrook Plan DPD, one of the following options should be employed within the policy wording.

Option 1: an additional criteria should be added as a site specific requirement as follows: "vehicle access to the site will be provided from Cotterill Road and in any event should not include any new access taken from Station Road"

Option 2: the last sentence of the policy should be amended to ensure general application: Instead of "The provision of 1 and 2 above are to be designed in alignment with the Bluehayes (Cranbrook western expansion zone)" the wording should be replaced by: "Proposals for the site, including the provision of vehicle access, should be designed in alignment with the Bluehayes (Cranbrook western expansion zone)"

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

Hallam Land Management/Taylor Wimpey

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 select as appropriate:

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

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

Hallam Land Management and Taylor Wimpey consider that it is critical for the Neighbourhood Plans to complement and align with the strategic policies of the development plan in respect of the expansion of Cranbrook. HLM/TW have the detailed knowledge available of the plans for expansion including the application proposals and as such are uniquely placed to assist the examiner in ensure that the plans are complementary and hence meet the basic conditions.

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 selecting 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 Broadclyst Neighbourhood Plan? Y N
2. The adoption of the Broadclyst Neighbourhood Plan? Y N

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

Hallam Land Management/Taylor Wimpey

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:



Date:

7 September 2022



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Your Personal Details

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First name:	Ben
Last name:	Meynell
Job Title (where relevant):	
Address:	C/o Hallam Land Management, 3 Apex Court, Bristol
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Telephone number:	See agent
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First name:	
Last name:	David Lock Associates (Nick Freer)
Job Title (where relevant):	Chairman
Address:	50 North Thirteenth Street, Milton Keynes
Postcode:	MK9 3BP
Telephone number:	
Email address:	

Part B - Representation Details

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

Hallam Land Management/Taylor Wimpey

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 number or other reference as appropriate)

Policy NE6

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.

Hallam and Taylor Wimpey have no issue with the identification of the 5 named Local Green Spaces in the Neighbourhood Plan.

HLM/TW do however object to the additional wording introduced at the Regulation 16 stage suggesting that support will be given to the designation of additional areas of Local Green Space at Blackhorse, Broadclyst Station, Tithebarne and Westclyst. This is said to be in accordance with paras 101 and 103 of the NPPF.

Whether such spaces in such locations would justify designation as LGS is unknown and is not the point here. The main point is consistency with national policy - a key basic conditions test.

Para 101 of the NPPF is quite clear: "The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them.....Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period".

A LGS can ONLY be designated when a plan is prepared. They can't come forward and be supported or designated outside of that process. Either there are proposals for LGS designation at Blackhorse, Broadclyst Station, Tithebarne and Westclyst which need to be examined or tested now (it appears that there are not), OR the potential for later designation between plans should be removed as being totally inconsistent with the NPPF.

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

Hallam Land Management/Taylor Wimpey

Question 3

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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 as appropriate. Please be as precise as possible and continue on a separate sheet if necessary.

For the reasons set out above the section of the policy beginning "Proposals for the designation of additional local green space... " to the end of the policy, should be deleted from NE6.

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

Hallam Land Management/Taylor Wimpey

Question 4

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Please select as appropriate:

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Last name:	Meynell
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Title:	
First name:	
Last name:	David Lock Associates (Nick Freer)
Job Title (where relevant):	Chairman
Address:	50 North Thirteenth Street, Milton Keynes
Postcode:	MK9 3BP
Telephone number:	
Email address:	

Part B - Representation Details

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

Hallam Land Management/Taylor Wimpey

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 number or other reference as appropriate)

Policy T2
Para 2 of Justification (page 140)

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.

See attached separate sheet setting out the comments and objections to Policy T2.

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

Hallam Land Management/Taylor Wimpey

Question 3

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For the reasons set out above:

1: the need for a policy in relation to the bridge is questioned

2: in any event the wording of the first para is incomplete and incorrect and should revert to that in the Reg 14 version of the Plan as follows: "To support the development of a bridge across the Waterloo-Exeter railway line (Figure 52) for cyclists and pedestrians to enable people to safely access Broadclyst station, Cranbrook, from the north and centre of the Parish".

3: in the event of a policy being retained, then a fifth bullet point should be added to the matters to be taken into consideration in developing any proposals for a bridge: "the design and ready delivery of safe pedestrian and cycle access routes to the bridge from Broadclyst"

4: in the absence of any evidence and as a result of the contradiction with the strategic policies of the development plan in relation to Cranbrook the following should be deleted from para 2 of the justification (on page 140): "to minimise the impact of Cranbrook Western development".

5: bullets 2 and 6 of para 3 of the justification are not sustained and should be deleted

6: the four bulleted points relating to possible bridge locations (on page 141) - which include locations that are not deliverable or achievable - should be deleted

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Signature:



Date:

7th September 2022

BROADCLYST NEIGHBOURHOOD PLAN

Representation by Hallam Land Management and Taylor Wimpey UK

POLICY T2 and Support Justification: CONTINUATION SHEET

Question 2

Please use the box below to explain why you are supporting or objecting to this part of the plan.

In responding to T2 at Regulation 14 stage, TW/HLM noted the "in principle" support for a pedestrian/cycle bridge over the railway offered in the NP. In setting out comments on the Draft policy, HLM/TW noted that since the proposals for Cranbrook set out in the East Devon Local Plan and Cranbrook DPD include an effective movement strategy for the expanded town, Policy T2 is a response to the additional community aspiration for a pedestrian bridge to serve Broadclyst residents. This aspiration is confirmed in the Regulation 16 version of the Plan. The intent of the policy is to support (not provide) the provision of a bridge *"to allow residents of the north and centre of Broadclyst Parish safe public access to the south of the parish and beyond to Broadclyst station, Cranbrook Town and Cranbrook Town Centre"*.

To be crystal clear there is no need (technical or otherwise) for any bridge to support the development of Cranbrook including its expansion areas. A comprehensive policy framework and technical basis for Cranbrook is set out in the East Devon Local Plan and Cranbrook DPD (which has been found subject to the adoption of the published modifications). No reference is made whatsoever to a new link across the railway to the north. It is neither necessary nor appropriate for the NP to consider such a bridge to serve Cranbrook.

The wording of T2 has changed a little in the Reg 16 version of the Plan. Specifically the first para of T2 now appears incomplete as it omits any expression of the NP's support for the bridge or even development proposals which include it or support it. The recasting of T2 to focus on development proposals is, we believe, unrealistic as development proposals in the NP area (the only ones upon which T2 could or would bite) are most unlikely to include or support a bridge. Rather the wording of the first para of T2 as set out in the reg 14 version of the plan is both complete and more realistic and should be reinstated (if there is to be a policy in relation to a bridge at all): "To support the development of a bridge across the Waterloo-Exeter railway line (Figure 52) for cyclists and pedestrians to enable people to safely access Broadclyst station, Cranbrook, from the north and centre of the Parish". Such wording also properly reflects the local community aspiration for the Bridge serve those from within Broadclyst.

However, even in such a "supportive formulation" of the policy, the policy should be included in the NP only if it is justified and deliverable and realistic. Contrary to para 2 of the justification for Policy T2 on page 140 of the NP, the justification for the bridge - as set out in the Reg 14 policy wording and in the intent of Policy

T2 (on page 99 of the reg 16 document), its purpose is to allow access from the north. It is not, and there is no evidence whatsoever to suggest that there is, any need for a bridge "to minimise the impact of Cranbrook Western development". The impact of Cranbrook expansion, and mitigation necessary, is carefully considered in the EDLP and Cranbrook Plan and is clear that no provision is required for a bridge to mitigate or minimise the impact of the Bluehayes development. Although the Policy T2 wording properly does not suggest this, the wording of para 2 of the justification hints at it and is contrary to the strategic policies of the development plan. The NP's "support" for a bridge can only be based on what it suggests is the community's (the community in the north and centre of the Parish) aspiration for a bridge.

Moreover, bullets 2 and 6 of para 3 of the justification suggest a benefit of any bridge being easier access to Clyst Vale Community College (bullet 2) and for Cranbrook residents to have a non vehicular option to access Broadclyst village and onwards. Access northwards from Cranbrook via a bridge, nor catering for such movements, forms no part of the movement strategy for Cranbrook nor the development plan policy for Cranbrook. As such these provide no justification for a bridge. These elements of the justification - at least - should be removed.

With regard to movements south from Broadclyst village to Cranbrook, the ease of access by car and footpath to Pinhoe station and retail facilities, will limit the attractiveness of such journeys even with any bridge over the railway. In addition, there must be evidence that a safe access can be provided and delivered along Broadclyst Road which is not clear and may well involve non-highway land.

In reality, it is most unlikely that the number of potential users of the bridge would make a second bridge viable or indeed worthwhile. In addition, the area of land where the bridge is proposed is an area of flood risk, which would require any road and bridge infrastructure to be elevated above ground level. Para 4 of the justification for T2 (page 141) recognises the difficulties "Such a structure would have significant costs and may only be deliverable as part of any infrastructure enhancement to the rail line (which is included in the Exeter Transport Strategy 2020-2030)". In the absence of a clear need for such a bridge it is unlikely to satisfy the "essential development test" of development in the floodplain.

Given the challenges in delivering the bridge and the specific nature of its role (to reflect the community aspiration), it is unclear whether a policy to support the bridge is justified and meets the basic conditions. It is totally wrongly evidenced in para 2 (at least in passing) as being, in part, to minimise the impact of western Cranbrook traffic and cannot be justified on this basis (to do so would contradict the strategic policies of the EDLP and Cranbrook Plan). It is also the case that the wording of the policy in its current form does not meet the basic conditions and should be reworded as per the wording in the Regulation 14 version of the policy.