



## **Broadclyst Neighbourhood Plan**

### **Submission Version Representation Form**

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

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.

#### **Using this form**

Please use a separate form for each representation you wish to make and state your name or organisation 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 8th September 2022 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:	Hallam Land Management/Taylor Wimpey/Persimmon Home
First name:	
Last name:	
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):

### 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 EC2 Regeneration of Crannaford Site  
Justification for Policy EC2 (page 88-90)

### 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.

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

### 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 redress the policy shortcomings and ensure that Policy EC2 is consistent with the strategic policies of the EDLP and Cranbrook Plan DPD, and with national policy in relation to town centres, it is considered necessary that the proposals for Crannaforde - which are entitled regeneration - are limited to regeneration and not expansion of commercial uses.

This is apparent from the generalised concerns in relation to traffic growth but also the potential impact of new uses on the strategic policies in relation to Cranbrook town centre.

To this end the following are suggested as potential necessary remedies - to be considered in tandem rather than as alternatives:

1: the first sentence of Policy EC2 should seek that the "area of Crannaforde be regenerated through refurbishment", but that references to "selective development" and "new development" should be deleted from that sentence and in the second sentence of the policy;

2: the very widely drawn references to Use Classes Eg(i) and E(a) and E(b) are deleted and far more narrowly drawn by precluding/limiting town centre uses of retail and offices - potentially to uses ancillary only to other uses on the site or, in the alternative to "small scale employment uses" which is the recommendation for the site in para 4.65 of the Site Assessment report by Aecom (Appendix 18), or in the alternative to "small scale rural development" as referenced in page 20 of the Basic Conditions statement;

3: revert to wording in para 4 of the Reg 14 version of the policy requiring that any proposals for the site must demonstrate that "the volume of traffic generated by the proposals can be accommodated on the local highway network without detriment to rail and road safety including quiet lanes...".

4: in addition to point 3 above, the policy should be amended to require that require that any additional traffic should not materially increase the traffic generated above that arising from the existing permitted development i.e. historic traffic levels associated with use of the site.

5: removal of the discussion in para 7 of page 91 in relation to potential crossing improvements when no evidence demonstrates the need for such improvements;

6: the inclusion of a requirement for any significant town centre uses (as defined by the NPPF) proposed on the site to be subject to an assessment of the impact of such uses on the Cranbrook town centre – the recognised town centre in the retail hierarchy..

7: the inclusion of a requirement that all proposals for the site should include a Travel Plan.

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

Hallam Land Management/Taylor Wimpey/Persimmon Homes

#### 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 and Persimmon Homes 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/Persimmon 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/Persimmon Homes

### **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:

7th September 2022

## **BROADCLYST NEIGHBOURHOOD PLAN**

### **Representation by Hallam Land Management/Taylor Wimpey UK and Persimmon Homes**

#### **POLICY EC2 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.**

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) for the Western Expansion area.

Hallam and Taylor Wimpey and Persimmon Homes also comprise the consortium of developers that have worked assiduously with the District and County Council - and in particular Cranbrook Town Council to deliver proposals for Cranbrook Town Centre. The first phase of those town centre proposals has consent and about to start construction - others remain to secure detailed approvals.

HLM/TW made representations on Policy EC2 at the Regulation 14 stage - noting the potential issue the traffic generated by the proposals for the Crannaford site, and seeking appropriate wording, to not materially increase the traffic generated by the existing permitted uses on the site.

It is evident that the issue of traffic generation and pedestrian movements was raised by others through the consultation stages. Appendix T2 indicates that concerns about access, at peak times, which was said to be a "common response". HLM/TW and Persimmon are also concerned that the proposals have the potential to cause significant problems in relation to HGV access to the site and turning movements into it close the railway crossing (and the effect that this has on vehicles seeking to cross the crossing as HGVs stop or turn into the Crannaford site)

In response the NPB has removed the potential for a children's commercial play park and day nursery from those uses that might be deemed acceptable in policy EC2. In other respects however the Regulation 16 version of EC2 now allows for a wider range of acceptable uses on the site - by virtue of the wider definitions now allowed under Use Classes E(g)(i) and E(a) and (b). Now offices and a wider range of retail and food and drink uses appear in principle, permissible, as Policy EC2 is now proposed. Indeed at various points in the NP justification for EC2 the benefits of multiple range of uses of a range of flexible options suggests that EC2 affords considerable scope to accommodate a variety of development options. EC2 itself refers to flexible commercial space across a broad range of uses.

Only the commercial play park and nursery use are ruled out in the NOP justification - because of potential movement across the railway (para 6, page

88). Garden centre uses appear to be supported – being “in line with past retail use and access levels and therefore not incur high levels of people on foot across the railway” (para 6, page 89). We do not believe that a garden centre and café is in line with past use. However we do agree that whatever uses are permitted should be “in line with past retail use and access levels” and not exceed such levels.

With regard to traffic issues, the redrafted policy seeks, in response to the comments made, the preparation of details in a TA to address traffic impact and impact on road and railway infrastructure. This appears to be a veery much woollier wording than appeared in the Reg 14 version of the policy where sub para 4 required demonstration that the traffic generated by development would result in no detriment to rail and road safety. The new wording simply seeks information but imposes no test requiring that the use that come forward as a result of the policy do not result in detriment (the reg 14 wording) or no material increase in the existing permitted traffic (Hallam and TW's suggested wording in their response to the regulation 14 consultation).

HLM/TW/Persimmon note and agree with the NPBs conclusions that any potential movements across Crannaford crossing falls within the capacity for "usage growth". As such the discussion in para 7 which explores in very preliminary and very generic fashion how any need for additional infrastructure can be assessed, is unwarranted and not justified. Rather the policy in relation to Policy EC2 should ensure that no significant impacts should occur, by virtue of the restriction of permitted uses on the site and a requirement to demonstrate no significant impact and indeed no significant increase in traffic from the historic position when Town and County Supplies was operation. TW/HLM and Persimmon believe that the policy should be reworded to tighten considerably the range of potential uses on the site and the need to demonstrate lack of impact or traffic growth. HLM/TW and Persimmon believe that this means that EC2 should seek refurbishment and not selective development to provide new commercial space.

In any event the policy must require the preparation and agreement of a Travel Plan for any proposals for the site.

Whilst the assessment of the impact appears to be a concern, HLM/TW is also mindful of wider concerns in terms of the impact of the much more broadly defined range of acceptable uses on the proposal for Cranbrook town centre so nearby. In sequential terms national policy requires town centre uses (including retail and offices) to be located in town centres i.e. at Cranbrook prior to any consideration of an expansion of retail or other town centre uses in an out of centre location. HLM/TC are concerned that the broad range of uses, which has no limits in terms of quantum of development, would conflict with, the proposals for the town centre (contrary to both national and local development plan policy).