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East Devon District Council
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06 January 2023

By Email Only

Dear Sir/ Madam

MLPD 18003 Land at Gribble Lane Grange Expansion Area On Behalf of Stuart Partners Ltd East Devon Local Plan 2020-2040 Preferred Options Regulation 18 Draft Plan Consultation Response

On behalf of our client, Stuarts Partners Ltd, we submit representations in relation to the East Devon Local Plan.

Our client is a local company with diverse interests based around agriculture, land, renewable energy, and employment delivery, contributing considerably more than 1,000 jobs and £100 Million Gross Value Added (GVA) into the East Devon and sub regional economies.

It owns land at Gribble Lane which makes up part of the Cranbrook expansion area. (Please see Appendix 1). Whilst it is identified as a Main Centre, we understand that Cranbrook's expansion is not addressed in the plan perhaps because the Cranbrook Plan was adopted in autumn 2022 and it will oversee its development until it is superseded by a new plan(s). However, we provide specific responses to the plan questions below.

The Duty to Cooperate

The Duty to Cooperate places a legal duty on Local Planning Authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local

Plan preparation in the context of strategic cross boundary matters. The NPPF sets out under paragraphs 24-27 that Local Planning Authorities and County Councils are under a duty to cooperate with each other on strategic matters that cross administrative boundaries. Paragraph 26 specifically notes that joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met within a particular plan area could be met elsewhere. This process within Devon is guided by the Devon Duty to Cooperate Protocol. This protocol includes reference to the development of appropriate housing development strategies across administrative boundaries.

Response

The Plan should be prepared and refined via constant dialogue with adjoining Councils and key stakeholders including landowners. If these key stakeholders are not incentivised to take part, significant parts of the plan will probably fail.

Housing Delivery and 5 Year Housing Land Supply (5YHLS)

Neither East Devon District Council (EDDC) (nor neighbouring Exeter City Council (ECC)) has (have) a robust 5-year housing land supply (*5YHLS). It is crucial to recognise the importance of the housing allocations and numbers delivered within the Cranbrook Plan, as part of the emerging Local Plan.

The annual housing requirement figure has gone up to 946 homes per year because of changes to the affordability ratio which is a key input into the government's standard method for calculating housing need (the GESP annualised local housing need for EDDC was 900 dwellings). The increased figure combined with a declining supply position means that a 5-year housing land supply can no longer be demonstrated, with EDDC only having 4.68 years of housing land supply with a 5% buffer (Housing Monitoring Update to year ending 31 March 2022 Report to Strategic Planning Committee, 4th October 2022).

The reporting confirms 4.68 years of housing land supply, meaning a shortfall of 328 dwellings (65.6 dwellings per year over the 5-year period) (Housing Monitoring Update to 31 March 2022).

The new Local Plan will therefore need to demonstrate that EDDC will have a robust 5-year housing land supply the point of adoption of the plan if it is to be found sound at examination. Our client supports the adopted Cranbrook Plan allocation sites in assisting with the delivery of housing numbers in East Devon.

Response

The under supply of housing in the current plan period needs to be correctly addressed by the Council and the shortfall should be rectified within the emerging Local Plan.

Strategic housing and employment development is supported within Cranbrook as set out by the Cranbrook Plan, adopted in 2022.

EDDC Specific Policy Responses (Cranbrook)

3. Strategic Policy - Levels of future housing development

To support the Plan objectives and delivery of the housing requirement, the Local Planning Authority must monitor and manage housing development in accordance with the monitoring framework and contingency measures. Cranbrook Plan allocations will be crucial in this delivery.

The ongoing development and potential for expansion of Cranbrook

Our client supports the direction of travel within Para 5.42, which states that it is not proposed that the new local plan will supersede the Cranbrook Plan. The policies of the Cranbrook Plan should remain applicable and will be formally saved.

The Cranbrook Plan does, however, only run to 2031 and our client supports review at the appropriate time to ensure policy coverage for and at Cranbrook in future years.

There are some existing local plan policies that are applicable at Cranbrook, and it is understood that a view will be taken in due course, on whether these are also saved or whether they are superseded with new local plan coverage (that may for selected policies 'sweep-over' and include land in the Cranbrook Plan area).

Our client supports Para 5.43 which states that whilst the Cranbrook Plan will remain in place for the Cranbrook Plan Area, beyond this defined area (i.e., on land covered by the new local plan), there are land areas on the edge of or close to what is Cranbrook (or will be the edge where planned development occurs) that could accommodate further Cranbrook related development.

Our client supports the direction of travel in Para 5.44 which states that the Local Plan should provide for existing allocations to come forward, over the years ahead, and then to review any potential for further outward expansion later.

Our Client's Land at Cranbrook

Our client has Land to the West of Gribble Lane in (CB5) the Grange Expansion Area of the Cranbrook Local Plan.

The Council know that our client is a well-known landowner and developer with a proven track record of delivering high quality strategic development projects, including residential and commercial developments with significant elements of green infrastructure and SANGS, ultimately creating homes, jobs, wealth and prosperity for East Devon and its sub region.

The Cranbrook Plan allocates the land within the Grange Expansion Area (CB5) comprising residential development and associated open space and green infrastructure, including the provision of Suitable Alternative Natural Green Space (SANGS), and is fully committed to making their land available for the proposed uses in short timescales; importantly they can deliver the objectives of The Cranbrook Local Plan and the land uses identified in the papers without reliance on third parties.

A planning application is well advanced (19/1798/MOUT Land West of Gribble Lane, Rockbeare. Outline application for the construction of up to 200 dwellings and associated infrastructure, with all matters reserved apart from access) and our client expects a decision on the application in the Spring of 2023.

If you require further information about specific aspects of the representations made, please contact us at the above address.

Thank you.

Yours faithfully

James

James McMurdo MRTPI MRICS

Director

For and on behalf of McMurdo

Copies: Client



APPENDIX 1. Site Plan

