

The Planning Policy Team  
East Devon District Council  
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[www.eastdevon.gov.uk](http://www.eastdevon.gov.uk)

13 January 2023

Dear Sirs ,

Nf/WCN

**EAST DEVON LOCAL PLAN 2020-2040  
PREFERRED OPTIONS REG 18**

I write on behalf of Hallam Land Management Limited and Taylor Wimpey UK Limited who are jointly involved in the development of the initial phases of Cranbrook and, now, in its subsequent expansion.

Hallam Land Management Limited and Taylor Wimpey UK Limited were actively involved in the preparation and examination of the Cranbrook Plan Development Plan Document, and were pleased to see its final adoption in the autumn of 2022.

Hallam Land Management Limited and Taylor Wimpey UK Limited consider that the appropriate guidance for the future development of Cranbrook is set out in the Cranbrook Plan.

As such Hallam Land Management and Taylor Wimpey UK welcome the statement in para 3.7 of the new Consultation Draft of the East Devon Local Plan, that *"Cranbrook is not addressed in this local plan as things stand as a Cranbrook specific plan was adopted in autumn 2022 and the Cranbrook Plan will oversee its development until this local plan and the Cranbrook Plan are superceded by a new plan or plans that will be produced, probably in the late 2020s or early 2030s."*

Hallam Land Management and Taylor Wimpey UK strongly support this position.

Para 3.7 does however go on to suggest that views are welcome on whether some policies in the existing adopted East Devon Local Plan should be saved if they are relevant to the determination of applications at Cranbrook.

Views are also sought on whether any policies in the new Local Plan (to 2040) should, contrary to the present intention, apply to Cranbrook *"where the Cranbrook Plan does not cover the relevant issue"*.

Hallam Land Management Limited and Taylor Wimpey UK would offer the following views on these matters:

- the Cranbrook Plan is a comprehensive document setting out some 28 policies that address strategic and detailed development



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management policies. The Cranbrook Plan considered and applied district wide policies to the Cranbrook context covering matters of infrastructure delivery, affordable housing, custom and self build housing, delivering zero carbon, SANGS, sustainable travel, parking, landscape and biodiversity and the provision necessary for all elements of open space. It is therefore comprehensive and has been prepared on a comprehensive basis with each element considered in the light of each other. A particular example are the comprehensive, Cranbrook specific, policy proposals for Cranbrook Town Centre;

- given the comprehensive nature of the DPD (including detailed development management policies) there are few, if any, policies within the East Devon Local Plan 2013-2031 that provide additional, significant, relevant guidance to the development of Cranbrook;
- insofar as there are any such policies then Hallam and Taylor Wimpey consider that they should be carefully identified and saved as part of the development plan, albeit the number of instances and very limited if they exist at all.

With regard to the new Local Plan Hallam Land Management and Taylor Wimpey UK are very strongly of the view that it is NOT necessary, appropriate or possible to seek to apply policies of the new Local Plan (2040) to Cranbrook. To seek to do so could:

- call into question the viability of the Cranbrook Plan;
- call into question the comprehensive and integrated proposals set out in the Cranbrook Plan (which of course also has its dedicated evidence base and Infrastructure Delivery Plan);
- result in additional confusion and contradiction in the reading of plan policies;
- undermine the whole rationale that the Council employed in its desire to produce a single Cranbrook Plan;
- run the risk of further delay as issues, and overall viability, debated in the lengthy Cranbrook Examination, are reconsidered.

Within the new Local Plan, and consistent with the view set out above, there is a need to ensure that there is no confusion or accidental overlapping of policy. It is important to be specific that Cranbrook is not addressed in the new Plan. This probably needs the area of the Cranbrook Plan to be carved out from the new Local Plan. HLM and TW also note that there are instances where Cranbrook is explicitly excluded from the policy (e.g. Policy 9 (Enterprise zone) and Policy 40 (Affordable Housing)). By some mechanism (perhaps by carving out the Cranbrook Plan Area from the Local Plan) this exclusion needs to be explicit in a much broader range of policies including but not limited to policies in relation to net zero carbon (28) heat networks (33), embodied energy (34); housing mix and tenure (40-44); town centre (56 and 57); car parking (68) etc

I trust that the comments set out above are helpful to you in moving forward with the next East Devon Local Plan.

I would of course, in addition, be delighted to discuss the above.

Yours sincerely,



NICHOLAS FREER  
CHAIRMAN

Email: 