

From: Ed Freeman
Sent: 12 April 2018 16:27
To: Diamond, Matthew <Matthew.Diamond@exeter.gov.uk>
Cc: 'Morris, Matthew (GVA)' <Matthew.Morris@gva.co.uk>; Robbins, Andy <andy.robbins@exeter.gov.uk>
Subject: RE: 18/0076/OUT - Moor Exchange

Dear Matt,

Thank you for forwarding the attached response from Mango Planning and Development further to our comments on the Moor Exchange retail proposals. Without wishing to get into a prolonged exchange of correspondence with Mango over these issues I did just want to clarify a few points for your consideration further to their letter:

- Their point about Cranbrook Town Centre not being identified as a town centre on the proposals map in our adopted Local Plan is noted. To my mind this is semantics given that our Local plan proposals map clearly identifies Cranbrook new town and refers to Strategy 12 – Development at Cranbrook which refers to the provision of a town centre at Cranbrook and states that “The town centre of Cranbrook will provide a focal point for retail, business and leisure activities and will be designed to create a vibrant day and night-time economy and this will be complemented by a series of smaller neighbourhood centres”.
- Aside from references to the town centre at Cranbrook in the local plan it is important to note that the town centre at Cranbrook has an extant outline planning permission and development has commenced in the town centre. There should therefore be no doubt that there is a town centre at Cranbrook and common sense would clearly suggest that any interpretation of policy should have regard to Cranbrook town centre and apply the sequential test accordingly. Notwithstanding these comments we are in the process of preparing the Cranbrook Plan which will be a DPD that provides a clear policy base for the expansion of the town. To avoid any confusion on this point we would now look to identify the town centre on the proposals map for the DPD which is due for submission for examination later this year.
- The impact test is by definition forward looking and about testing future scenarios I appreciate that this is more difficult without the baseline that could be drawn from an existing centre but an assessment based on potential scenarios looking at similar size towns and settlements does not seem an unreasonable requirement particularly of a development that by it's own admission is seeking to draw trade from the Cranbrook area.
- The 500 sqm retail space to be provided shortly is a first phase requirement, however this will clearly be followed by further phases with the town centre being required to form 12.1 ha of the town under the Section 106 agreement that accompanies the outline consent. It is therefore of ample size to accommodate the Moor Exchange proposals which have a site area of 3.2ha.
- Ultimately the NPPG and PPG does not directly address the circumstances that apply here of assessing the impact on an emerging town centre but I think the approach we have outlined is reasonable and appropriate to the circumstances. To have a development that seeks to address the needs of a locality and yet for it not to address the impact on existing retail proposals that are designed to address that need would be perverse.

I hope my comments are helpful and help to further discussions with the applicant in this case.

Regards.

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