

# EAST DEVON VILLAGES PLAN EXAMINATION

## FURTHER STATEMENT TO MATTERS AND ISSUES FOR EXAMINATION

### **MATTER 1 – LEGAL COMPLIANCE, SCOPE OF THE EDVP AND DUTY-TO-CO-OPERATE**

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## **MATTER 1: Legal Compliance, Scope of the East Devon Villages Plan (EDVP) and Duty to Co-operate**

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### **Issue 2: Scope of the EDVP**

#### **Question 2.1 - Is the scope of the EDVP in line with the role for the Plan as set out in the LDS and the EDLP?**

The Council's Local Development Scheme (LDS) was updated in July 2017. With regards to the Villages Plan, paragraph 3.2 states:

*"This plan will be specifically concerned with development issues and boundaries in and around key villages of East Devon and town of Colyton it will also address Greendale and Hill Barton Business Park"*

The EDLP states that the Local Plan *"will set out strategic policy for development across East Devon and the full suite of policies for the seven main towns of the district and the West End and countryside areas, but not those villages with/proposed to have Built-up Area Boundaries... nor Greendale and Hill Barton Business Parks. These villages and Business Parks are to have their own inset maps which will form part of the Village Development Plan Document."*

Both the earlier versions of the EDLP and the VP made it clear that the intention of the VP was to show the extent of the business parks, any outstanding permissions/ allocations as well as proposed areas for development. The draft consultation document (January 2014) stated that a site evaluation would also be included considering an overview of site options and justification for proposed allocations based on Council feedback and appraisals. It was plain that the scope of the VP was therefore to fully consider the development requirements and opportunities at the business parks and to contain appropriate policies to assist with the consideration of development proposals at these sites.

The Council are now however, only looking to identify the 'extent of authorised business uses' on the Inset Plans and have not provided any additional specific policies in the document against which proposals at the business parks could be considered. We fail to understand how the Inset Plans will in any way assist in the determination of possible *future* planning applications at these sites.

The VP as currently drafted fails to meet with the scope of the document that was clearly originally intended.

As set out in our recent letter dated 1<sup>st</sup> September 2017, the exclusion of Greendale and Hill Barton Business Parks from policy E7 (Extensions to Existing Employment Sites) of the EDLP, was a 'further change' proposed

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by Council members at the meeting on 26<sup>th</sup> March 2015. The reason for excluding the business parks from this policy was due to the intention that consideration would be given to potential development opportunities at these business parks through the VP. The VP as currently drafted, fails to do this.

The change to Policy E7 to exclude Greendale and Hill Barton Business Parks did not stem from discussions with the Inspector at the Local Plan hearing sessions in 2014, as appears to be suggested by the Council in their response to the Inspector's initial questions (

This examination is the only time to consider the matter of indigenous growth at these existing business parks, since it was deferred from the Local Plan examination, by virtue of the change made by the Council on 26<sup>th</sup> March 2015.

**Question 2.2 - Are the policies of the EDVP consistent with the adopted development plan in accordance with Regulation 8(4) of the Town and Country Planning (Local Planning) (England) Regulations 2012?**

Strategy 1 of the EDLP is clear that planned provision will be made in East Devon for a *minimum* of 17,100 new homes to 2031 and development on *around* 150 hectares of land for employment purposes. Whilst the West End will accommodate significant residential development and major employment development to attract strategic inward investment, it also recognises that "*development in smaller towns, villages and rural areas will be geared to meeting local needs*".

As set out in our earlier representations, the EDLP states the need to "*increase the supply of new employment opportunities in East Devon*" and that a "*key means for achieving this end will be to identify suitable land for employment purposes*" (paragraph 6.6).

The VP is not consistent with the adopted development plan in relation to the matter of supporting employment growth and new employment opportunities. The adopted EDLP is silent on the matter of employment provision/ future development at both Greendale and Hill Barton Business Parks. The Villages Plan offers the opportunity to address this 'policy vacuum' however the document as currently drafted fails to do so and effectively seeks to apply almost a 'blanket ban' approach to development. This approach would only likely serve to fetter the delivery of Strategy 1 of the EDLP (in particular).

**Question 2.3 - Are there any valid issues which the EDVP has failed to address, given the role of the plan as set out in the LDS and EDLP?**

The EDVP fails to address the development requirements of, and provide appropriate planning policies to assist with the consideration of development proposals at Greendale Business Park.

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Please see our further comments in relation to Matter 2, Issue 2 (Employment Areas) below.