
From: Mike Allen [REDACTED]
Sent: 05 January 2018 16:14
To: Planning Policy
Subject: Protect: Villages DPD Consultation 2018 Formal Comments for submission to Inspector - please acknowledge

Mike Allen comment to Inspector on Hill Barton and Greendale issues

(The Lead Councillor for Business and Employment in East Devon District Council (EDDC) and past Chair of the Local Plan Forum which developed the current EDDC Local Plan)

EDDC welcomes proposals for business investment and the creation of units for small and medium sized enterprises across the East Devon area subject to NPPF and Local Plan criteria.

We appreciate that cumulative development along the A3052 road corridor has the potential to negatively impact upon existing communities and infrastructure and the operations of existing businesses. The lack of objection from Highways England on a recent nearby planning application is significant

Hill Barton (HB) and Greendale Business Park (GBP) are situated near recently approved (on appeal) Yeo Business Park. This determination is of direct material significance in considering further proposed development. .

I will examine four main areas of consideration for Economic development in respect of this SPD for Business Parks:

- 1) It could be reasonably assumed that the Planning Inspector's view that employment space proposals of a 'relatively small scale development that would provide jobs for local people' would be applicable to the current plans for Business Parks in the area. It is similarly likely that this location would also be deemed a suitable location for small scale business units at appeal.
- 2) Greendale and Hill Barton Business Parks are larger scale and vitally important to the economic expansion of East Devon outside of the Science Park and Skypark areas
- 3) The lack of residential neighbours means no loss of amenity.
- 4) There is clear demand for the facilities at Hill Barton and Greendale, without which business expansion would not be accommodated elsewhere. The medium quality, flexibility and appeal of the industrial storage space and units for larger growing businesses in the district is essential. To be clear, we have no economic basis on which to challenge further development within the perimeters set in the Villages DPD.
- 5) EDDC's Economic Development team have reviewed the Draft Villages Plan as well as the Sustainability Appraisal. Having also reviewed Strategy 27 and Policy E7 of the adopted Local Plan, in addition to material evidence in respect of employment land delivery below, I recommend that the Greendale (GD) and Hill Barton (HB) employment sites be removed from this Villages Development Plan. Approval of this draft Villages DPD with GD and HB included will exacerbate the undersupply of employment premises we are already experiencing through non-delivery of our employment allocations in the adopted Local Plan.

The Council's strategic drive is to prioritise the development of employment land in the west of the district. Any applicants are advised to examine the potential suitability of our Enterprise Zone sites (Inc. the Exeter Airport Business Park Expansion site; Cranbrook Town Centre; Skypark & Science Park), all of which benefit from infrastructure investment in excess of £25 million and include enhanced transport

corridor infrastructure, rail stations and employment site infrastructure as well as being immediately adjacent to Exeter Airport and A30 and M5 junctions.

However, we are aware of some businesses feeding back a view that sites, such those examined above are aimed predominantly at the medium to large scale employers with scientific and professional or transport accommodation requirements in excess of 5,000 sq. ft. This can fail to meet the needs of many new and growing local medium sized manufacturing / B2 class businesses many of which would not be welcome in proximity to residential areas or on Science Parks.

In 2012 East Devon District Council commissioned Professor Nigel Jump of Strategic Economics Ltd to carry out an independent assessment of the economic impact of the two strategic employment sites in East Devon. His conclusions were clear in that investment in these locations has unlocked valuable employment and economic growth in the district. Moreover, these sites have the potential to make further economic net benefits (job creation, added GVA and inward investment) throughout challenging economic periods to come. The report concludes that when social and environmental factors are considered, there remains a net positive impact of extended capacity at these sites which are yet to run their full course. In light of this EDDC commissioned evidence, inclusion of Greendale and Hill Barton within the Villages DPD is unwarranted, contrary to the specialist advice we have commissioned and would cause demonstrable harm to the district. These findings are echoed in 3 subsequent studies of demand for industrial and commercial space in East Devon which formed the overall economic element of the EDDC Local Plan which placed great weight on the sustainable balance of social, economic and environmental issues as the "Golden thread" which ran through the Local Plan and the NPPF

The proposals for the development of medium sized businesses of B2/B8 category fit well with a large number of B use premises enquires received by Economic Development in the last 2 years, The filling out and redevelopment of Greendale and Hill Barton will complement the demand for larger B use provision and remain a welcome addition to the diverse mix of commercial accommodation required to facilitate indigenous business growth as well as the district's ability to meet the needs of potential inward investors seeking to become established or grow their operations in East Devon.

Having recently reviewed B use premises demand across the district, the following updates can be cited: - In Exmouth, B use accommodation at Liverton Business Park is in high demand. We have seen speculative build in this location with all but their final unit now let. They are unable to accommodate further demand - Across Clinton Devon Estate's whole East Devon portfolio of commercial property; they have no other vacant B use premises available, representing a significant shortage of supply.

The Exeter and Heart of Devon Commercial Premises Register has received 43 separate enquiries for B1 Office accommodation in the District in the last 3 months - Greendale have received more than 80 B use premises enquiries in the last 12 months totalling more than 850,000 sq. ft. - Also, west of the Enterprise Zone, land is being brought forward for speculative development of small, flexible B use units.

Recently, as part of their Business Plan for the use of the Owen Building, Rolle Exmouth Ltd provided details of 59 separate businesses, social enterprises, individuals, groups/classes, education & training providers who have declared an interest in finding small SME commercial premises in Exmouth

Lastly, to curtail the provision of good jobs at Hill Barton and Greendale would be to consciously, selectively and actively undermine our stated (and adopted) Local Plan ambition of delivering one job per new dwelling. This target has not yet been realised, resulting in an unsustainable imbalance between the provision of new homes and new, quality jobs in East Devon.

We cannot continue to overlook this imbalance as our young teens and twenties leave to pursue careers elsewhere and the economically inactive grow as a proportion of our aging population.

We continue to receive inward investment enquires of differing scales and different employment use classes, including from the Dept. for International Trade (DIT, formerly UKTI). These request a diverse mix of investment formats and much needed employment opportunities from outside the district. However it is often difficult to identify suitable available employment premises. Maintaining a diverse mix of development land and premises is key to securing these investments and associated local economic benefit.

The increased density of employment possible on Greendale and Hill Barton sites for B1/B2/B8 use is a clear benefit to our established local supply chains and producers/providers served by these developments.

Finally – I am concerned about an issue of prejudice: I believe that it would be prejudicial to the economic development of East Devon to consider the imposition of Strategy 7 (Greenfield) on Hill Barton on Greendale since the sites are clearly well used industrial sites which are in the right location for the type of businesses they serve. The two sites have been afforded a specific exception in Policy E7 – ‘Extensions to Existing Employment Sites’ of our adopted Local Plan (See Pg. 196 “This policy will not apply at Hill Barton and Greendale business Parks”). While for landscape and other reasons we might wish to limit the further expansion of the sites, I believe it would be prejudicial to single out these two sites rather than the 50 other smaller industrial sites for special treatment. The criteria already laid down within the Local Plan are fully sufficient to control and promote the appropriate development on these sites

Recommendation

I recommend that the Greendale (GBP) and Hill Barton (HB) employment sites be removed from this Villages Development Plan. I recommend that any application of strategy 7 within the perimeters already agreed should not occur but that other Planning Policies on Industrial Land development should be applied on the basis of equity and equality with other industrial sites in East Devon

Approval of this draft Villages DPD with GD and HB included and subject to strategy 7 will exacerbate the undersupply of employment premises we are already experiencing through non-delivery of our employment allocations in the adopted Local Plan.