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East Devon District Council
Blackdown House,
Border Road,
Heathpark Industrial Estate,
Honiton,
EX14 1EJ

11 January 2023

By Email Only

Dear Sir/ Madam

**Land North of Long Lane submitted on behalf of Mrs L Askew; Ms K Askew and Mr S Askew.
East Devon Local Plan 2020-2040 Preferred Options
Reg. 18 Draft Plan Consultation response**

On behalf of our clients, Mrs L Askew; Ms K Askew and Mr S Askew, Kislingbury Property Consultants Ltd (KPC) submit representations in relation to the Draft East Devon Local Plan.

KPC submit representations in relation to the Draft East Devon Local Plan, on behalf of our client as follows.

1. Policy Responses

Policy 1. Strategic Policy - Spatial Strategy

It is agreed that new development should be focused on the western side of the district.

Policy 4. Strategic Policy - Employment Provision and Distribution Strategy

My clients support the inclusion of their land within an allocation area, and it is available for development. The site is sustainably located and will support the aspirations of the Local Plan to secure employment opportunities in the Western part of East Devon and support the future operation and growth of the airport as a key gateway to the region.



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More emphasis needs to be given to the needs of the sub-region as opposed to East Devon as a single entity (i.e., Exeter City and the aspirations within its emerging Local Plan). Whilst the supporting text acknowledges that strategic policy should provide for objectively assessed needs for housing and other uses and the needs that cannot be met in neighbouring areas, there is no dialogue to suggest that the needs of Exeter specifically have been considered when calculating both housing and employment land need. It is noted in the 'Housing Need, Supply and Requirement Interim Topic Paper November 2022' that EDDC understands that ECC have no unmet housing need (this is simply untrue; ECC is at least 1,800 houses behind in its current Core Strategy Period) based on the Exeter Plan outline draft but there is no discussion beyond this point in relation to housing or employment land requirements.

The current proposed Exeter Local Plan involves the redevelopment of some of its established employment sites. If this happens East Devon will have to accommodate Exeter's employment land requirements (Neither East Devon nor Exeter have enough employment land).

My clients support the recognition that there is a need to secure employment opportunities in the western part of East Devon, acknowledging the geographical advantages for businesses which would be located there.

Policy 5. Strategic Policy - Mixed use developments incorporating housing, employment, and community facilities

If the EDNA is not available, it isn't possible to confirm that the site allocations will meet the needs across the plan period, nor those of the wider area. More sites may need to be identified and allocated.

Policy 13. Strategic Policy - Exeter Airport and its future operation and development

My clients support the policy text whereby the New Local Plan Economic Strategy for East Devon includes reference to continuing to secure employment opportunities in the western part of East Devon, with specific reference to 'making provision for the development of a smart and sustainable aviation cluster centred on Exeter Airport, utilising existing and enhanced facilities, enabling it to act as a test bed for future flight technology and to create new markets in maintenance/repair/overhaul, cargo handling and logistics.'

My clients support policy notes that Exeter Airport is of strategic importance for travel and communications for the south-west of England and it forms a key asset for East Devon and surrounding areas. Plan policy supports its future operation and growth of the airport as a



key gateway to the region and in providing the opportunity for highly skilled, high value job creation in aviation and other sectors.

Policy 14. Strategic Policy - Employment land to the east of airport buildings

My clients support the aspirations of this policy. Part of my client's land is included within this allocation and is available for development. The site is sustainably located and will support the aspirations of the Local Plan to secure employment opportunities in the Western part of East Devon and support the future operation and growth of the airport as a key gateway to the region.

Policy 15. Strategic Policy - Employment land east of the Airport and north of the A30

My clients support the aspirations of this policy. Part of my client's land is included within this allocation and is available for development. The site is sustainably located and will support the aspirations of the Local Plan to secure employment opportunities in the Western part of East Devon and support the future operation and growth of the airport as a key gateway to the region.

2. General Plan Comments

East Devon District Council has a duty to cooperate with neighbouring authorities.

Supporting investment in jobs is crucial to the success or otherwise of the Plan but EDDC is failing to bring forward enough employment sites.

More land is required to remedy supply side issues.

EDDC committee reports confirm that the western end of the district is an area identified for growth at scale and more sites need to come forward than those shown in the plan in this area to address employment land supply side issues.

3. My Client's Land

Our client's land (shown in appendix 1), is well related to Exeter Airport and proposed allocations and relatively unconstrained, it is available and suitable for development and should be included as an allocation for development.



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We urge that further detailed and advanced work is undertaken regarding the Economic Development Needs Assessment (EDNA), which will set out quantified levels of potential need/demand for employment land going forward. The EDNA evidence (and other information) must then be used to work through more fully on both the strategy for employment land provision and proposed allocations for development.

My clients also own additional land adjacent and opposite this site and known as Land South of Long Lane which is allocated in the consultation draft.

In respect of our clients land South and North of Long Lane, there are obviously some strong links with the wider strategic thinking as set out within the emerging plan and there is proximity to existing employment uses both in terms of expansion around the airport and also the new community.

My clients support the inclusion of both their land parcels within an allocation area and confirm that their land is available for development.

It is our view that both sites should be considered for allocation within the Local Plan.

The sites are sustainably located and will support the aspirations of the Local Plan to secure employment opportunities in the western part of East Devon and support the future operation and growth of the airport as a key gateway to the region.

We urge that further detailed and advanced work is undertaken regarding the Economic Development Needs Assessment (EDNA), which will set out quantified levels of potential need/demand for employment land going forward. The EDNA evidence (and other information) must then be used to work through more fully on both the strategy for employment land provision and proposed allocations for development.



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4. Conclusions

1. EDDC will have to cooperate with adjoining councils to deliver the greater Exeter area's development requirements.
2. The West End should remain a key focus for growth. My client's landholdings are in this sustainable location.
3. My clients support the inclusion of their land as part of an employment allocation and confirms that their land is available.
4. My clients also have additional land adjacent which is not currently allocated, but which they consider should be allocated for employment in the Local Plan. They confirm that this land is also available for development.
5. All my client's land is suitable and available to meet East Devon's employment land needs, as well as to meet Exeter's employment land needs.

My clients thank you in advance for taking their comments into consideration.

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

We look forward to further dialogue as 'The East Devon Local Plan' progresses.

Thank you.

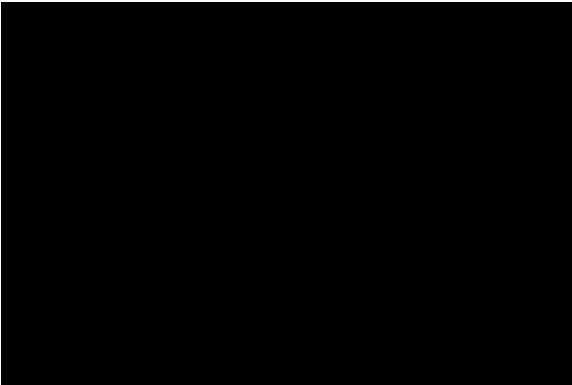


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Yours Faithfully



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Director
For and on behalf of Kislingbury Property Consultants Ltd
Copies: Client



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APPENDIX 1. SITE PLAN – ASKEW LAND NORTH OF LONG LANE



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