

# **Woodbury Salterton Residents Association**

## **Final Response to Village Plan Consultation**

**09/10/2017**

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**1. Response to Question 10. Reference the inclusion of Business Parks**

The Woodbury Salterton Residents Association would like to explain more on the background to why these 2 Business Parks should have been included into the Villages Plan.

The reasons why these 2 Business Parks were included in the Main Modification to the East Devon Local Plan?

**1.1 The Answer Provided by EDDC**

*10. In the initial Publication draft of the East Devon Local Plan, submitted for Examination in 2013, Policy E7 did not refer to Greendale and Hill Barton.*

*At hearing sessions held in early 2014 the Inspector, Mr Anthony Thickett, raised concerns about a number of plan policies and reasoned justification.*

*It was verbally agreed that changes should be made to the plan to reflect concerns raised and points noted and also changes made in response to further work that was identified as being needed.*

*A schedule of changes was produced and is forwarded as a separate document (see Item Number 197 in respect of Policy E7), it is given the reference number VP32*

**1.2 Explanation of removing the 2 large Business Parks from the Local Plan.**

To explain the “concerns about a number of plan policies and reasoned justification” Woodbury Parish Council had responded to the Local Plan in 2012:

The following is the section of the original proposed section of the Local Plan (2012)

*“21.86 It is important for East Devon to develop its employment base and where successful, established sites have reached an 80% built out level an additional extension should be provided to concentrate and encourage successful sites. This policy will offer protection to the surrounding built and natural environment whilst promoting business in the District.”*

### 1.3 The Original Policy E8 (changed later to E7)

#### **E8 - Extensions to Existing Employment Sites**

Where it is clear that 80% of a business or employment site or estate is occupied the Council will permit a 10% extension (gross area) provided the following criteria are met in full:

1. The local highway network is capable of accommodating the forecast increase in traffic established by a Traffic Impact Assessment; or where these can be mitigated either by physical works being undertaken by the applicant or S106/CIL contributions are secured towards the cost of the works.
2. There will be no detrimental impact upon any nearby residential properties.
3. No protected landscapes or historic interests are adversely affected and the existing local biodiversity and habitats are conserved or enhanced.
4. Requirements are met for onsite renewable energy production.

### 1.4 Woodbury Parish Councils comments in 2012

"We support the distribution of new housing as set out in the Plan. Any further housing or industrial development which encroaches onto the good agricultural land in the vicinity of the already busy A3052 would be wrong.

Notwithstanding spoiling the countryside and the character of nearby villages, the resultant traffic would lead to a further increase in the gridlock already experienced at peak travel times along the road, especially at its junctions with the A376 and the M5."

### 1.5 Woodbury Salterton Residents Association comments

The Woodbury Salterton Residents Association were also concerned regarding further expansion at the Business Park, and highlighted the significance of early draft of Policy E8 in the proposed Local Plan in their response:

### 1.6 Quote from EDDC Minutes April 2015

*The report states that any industrial site which is 80% full to capacity should be extended by 10% and this would provide protection to the surrounding area is illogical and unworkable.*

*Elsewhere in the report, it's stated that boundaries will be defined, but in 24.13 it suggests any successful industrial area will increase spreading like a cancer across the countryside.*

*If you do the maths a site of 100ha which is 80% full can add another 10% so it grows to 110ha so then it builds another 8ha of units on the site, they then can re-apply for another 10% and so on!*

*If this proposal was implemented it would discourage any investment close to any industrial area for fear of it impending industrialisation.*

*The threat of all industrial sites which are successful will be allowed to expand as long as it has its own incinerator or similar device for energy production included will also deter any investment close by.*

Prior to the Inspectors hearing there was much discussion between the Parish, the Association and District Councillors with substantial pressure to amend Policy E8 in April 2015 at an Extraordinary Full Council Meeting at EDDC.

Extract from the approved meeting minutes.

*Cllr Ray Bloxham made a proposal, which was seconded, that the text in Policy E7 (Extensions to existing employment sites) be amended to exclude Hill Barton and Greendale Business Parks from the policy as these two sites would be covered by the Villages Development Plan Document. This proposal was put to the vote and carried.*

Cllr Ray Bloxham was District Councillor for Raleigh Ward until May 2015 (which includes Greendale Business Park) and the Seconder was Councillor Mike Howe for Bishops Clyst which included Hill Barton Business Park.

This proposal came directly from concerns from local Parish Councils and Residents Groups on the earlier proposed E7 proposal to continually allow Employment sites by 10% once they had achieved 80%

The issue was again discussed at the following Inspectors Hearings where the Inspector had already highlighted the issue of allowing Hill Barton and Greendale Business Parks to grow at 10% increments

### 1.7 Schedule of Changes 197 for the Local Plan

Item No	Specific Location – If Relevant	Policy No.	Para Notes	Para or Para that precedes change	Brief Summary of proposed change to the plan	2014 Change	2015 Change	Brief Summary justification for change	Page
197.		E7	Policy E7 that follows on from para 23.26	23.26	Policy E7 amended to: a) Clarify that policy is applicable outside of Built-up Area Boundaries; b) Remove explicit reference to 80% and 10% levels but rather to provide more flexibility to reflect local circumstances; c) Delete criterion 4) but add a new sentence encouraging on-site renewable energy; d) Add a new sentence withdrawing permitted development rights. e) Add a new sentence to specify that policy is not applicable/does not allow for expansion of Greendale and Hill Barton Business parks.	Yes	Yes	To update policy to provide more general flexibility and offer scope to reflect local circumstances. And to note potential difficulties of securing/requiring on-site renewable energy and importance of avoiding 'loss' to other non-employment uses. Exclusion of Greendale and Hill Barton sites from policy reflects Council concerns over site expansion.	216

Policy E8 above became Policy E7 in the agreed Local Plan Policy Document

### 1.8 Explanation of why the Hogsbrook Employment area was included

Following the Planning Inspectors approval, the Local Plan was adopted by EDDC and work on the Villages Plan had already started.

EDDC decided to include The Greendale Business Park and the smaller separately owned Mill Park Industrial Area. The unapproved Industrial Area between Greendale East and Hogsbrook Farm where not originally considered as the planning Applications for them had been refused.

The agricultural units and compounds at Hogsbrook Farm which had been changed to Industrial without planning approval prior to the Local Plan being adopted. The planning permissions therefore were subsequently considered following the adoption of the Local Plan the proposals were considered against Policy E7, as they were units where considered by the Local Authority to be an extension to the Greendale Business Park and refused

## 1.9 Brief Planning History of the Hogsbrook Units

- Ref. No: 15/1950/FUL Retention of conversion of building to 5 no. industrial units (Use Class B2 General Industry, B8 Warehouse and Distribution and B1 Office and Light Industry) 1 - 5 Hogsbrook Units Woodbury Salterton Exeter EX5 1PY

Refused, went to Appeal and was approved

- Ref. No: 15/1936/FUL Retention of conversion of building to 3 no. industrial units (use class B8 Warehouse & Distribution) Units 7 - 9 Hogsbrook Units Woodbury Salterton Exeter EX5 1PY

Refused, went to Appeal and was approved

- Ref. No: 16/0568/FUL Use of land for storage of commercial vehicles, including temporary office/ welfare accommodation, palisade fencing and associated works. Hogsbrook Farm (land North Of) Woodbury Salterton Exeter EX5 1PY

Refused, Subject of a certificate of Lawfulness or Enforcement to remove.  
These compounds links Greendale East to Hogsbrook Units

- Ref. No: 16/1257/FUL Retention of conversion of building to 5 no. industrial units (Use Class B2 General Industry, B8 Warehouse and Distribution and B1 Office and Light Industry) 1-5 Hogsbrook Units Woodbury Salterton Exeter EX5 1PY

Withdrawn because it was the same application as 15/1950/FUL which was allowed on appeal

- Ref. No: 16/1258/FUL Retention of conversion of building to 3 no. industrial units (Use Class B2 (General Industry) and B8 (Warehouse and Distribution)) 7 - 9 Hogsbrook Units Woodbury Salterton Exeter EX5 1PY

Withdrawn because it was the same application as 15/1936/FUL which was allowed on appeal

- Ref. No: 16/1786/FUL Validated: Mon 08 Aug 2016 Retention of conversion of buildings to 13 no. industrial units (Use Class B1 (c) light Industrial, B2 General Industry and B8 Storage and Distribution) 11- 23 Hogsbrook Units Woodbury Salterton Exeter EX5 1PY

Approved because of the previous overturning of the LPO

These planning refusals were appealed by the developers to the Planning Inspectorate and the Inspector considered that at that time the Hogsbrook units were “clearly physically separated” to the Business Park. Shortly after the determination of the Appeal the Hogsbrook units were amalgamated into the Greendale Business Park.

### **Reasons**

6. The change of use from agricultural buildings has already occurred and the units are currently occupied. Although it is associated with the Greendale Business Park in terms of ownership and being in fairly close proximity to it, the units concerned are nevertheless clearly physically separated from that main park, on a countryside site, and so do not represent an extension to that park, even if advertised as being part of it. They are also smaller units than those generally seen on the Greendale Business Park or that at Hill Barton, and it is a relatively small scale development as a whole compared with those other sites.

The Above taken from APP/U1105/W/16/3151307 and APP/U1105/W/16/3151311

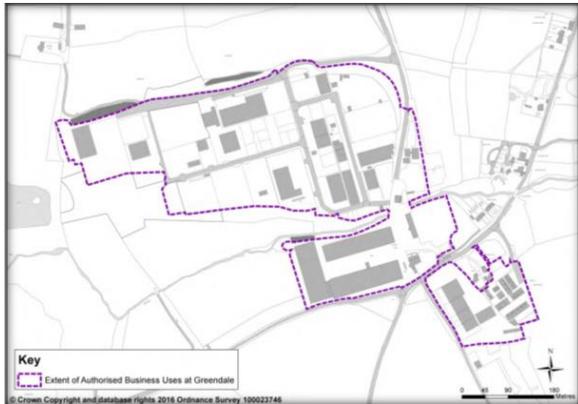
The large Greendale Business Park Sign was erected immediately following the Inspectors decision at the main entrance to the business park.



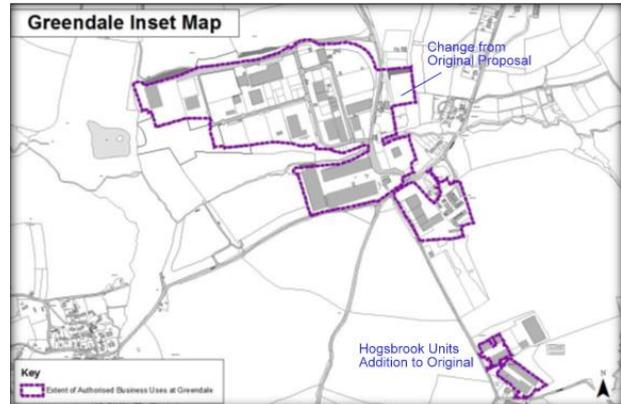
Picture 1. Main Entrance Sign for Greendale Business Park

### 1.10 Changes to the Employment Area to include Hogsbrook

Therefore, at the following Strategic Planning Meeting at EDDC during the debate on agreeing the Villages Plan it was agreed to Include the approved areas of Hogsbrook into the Greendale Employment area.



Picture 2 The Original Proposed Employment Area



Picture 3 The Adjusted Employment Area

The Adjusted Employment Area included an area to the North West that the owners disputed as having Planning Permission in (2009) and the Hogsbrook Units.

However the industrialised sections between Greendale East and the AD Unit at Hogsbrook Farm and a large section to the North East have not been included as neither of these sites have planning permission and the 6<sup>th</sup> month limit to appeal have both passed.

### 1.11 Correspondance between the Ralieg Ward Councillor and Ed Freeman

Councillor Geoff Jung EDDC Raleigh Ward had an exchange of emails about the Employment designation for the Villages Plan

Dear Ed.

I see the Village Consultations have been published but on quickly reviewing the documents I cannot see the consultations regarding Hill Barton and Greendale Business parks which have been taken out of the local plan and it was stated would be included along with the village proposals.

Can you let me know what the proposals are for these 2 important locations and who and how is it to be consulted?

Cllr Geoff Jung

Dear Councillor Jung,

Thank you for your attached e-mail. Historically we have not had built-up area boundaries for Hill Barton and Greendale Business Parks simply inset maps within the plan which indicate the extent of the employment uses at the sites for the purposes of policies within the plan that seek to protect and retain employment land. We had envisaged continuing this approach rather than having a formalized built up area boundary. This would mean simply identifying a line around the built and consented areas and that would be all. This is the reason why it is not specifically referred to in the consultation since the line would be drawn on a factual basis taking account of the permissions granted. If you or any of the community feel that there should be a built-up area boundary around either development then by all means make that comment in response to the current consultation and we can look at a different approach but unless there is a desire to allocate more land to become part of the business park then I would see little need or purpose to having a BUAB.

I hope these comments are helpful.

Kind regards.

Ed Freeman

Service Lead – Planning East Devon District Council

### **1.12 Greendale Business Park History.**

Thirty years ago, the business park was a farm with some agricultural buildings which the owners claimed to be “redundant for farming use” They were given permission to retrospectively be converted to Industrial units.

More agricultural buildings were built and again allowed to become Industrial. Most of planning applications were “retrospective”

In 2009 the Business Park was permitted to enlarge to its present size as an “Exception Site to the then Local Plan” This was because the East Devon Business Forum (chaired by disgraced Conservative Councillor Graham Brown who boasted to a daily Telegraph “sting” reporter that he could provide approval for planning for a fee). The Forum claimed there was an acute lack of Industrial land available within the district.

Steadily the owners have built a very large Business Park in the open Countryside which was never the local planning authorities policy.

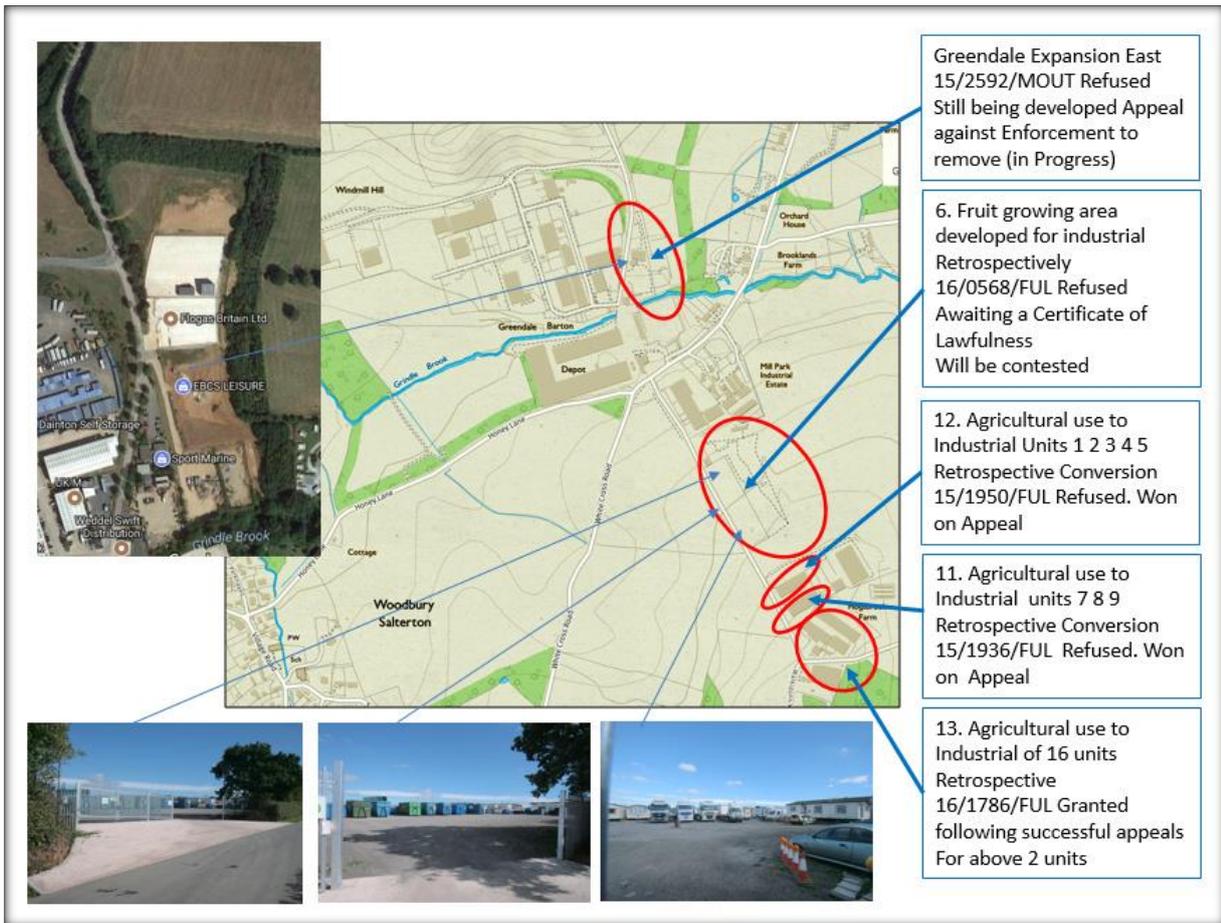
The residents of the rural village of Woodbury Salterton consider that any further expansion will destroy their beautiful village set in the open countryside, and for the last 10 years have campaigned for better planning protection.

The Local Authority with their recently approved Local Plan decided on the location for housing and commercial land, and agreeing with the village residents that further expansion of Greendale Business Park would not be appropriate or suitable.

The Local Plan is a blueprint for district planning until 2031 and includes policies for commercial and industrial developments to be built close to urban settlements. Substantial commercial opportunities exist at Cranbrook, Exeter Airport and on land known as the West End (on the outskirts of Exeter). This is to follow the Government’s planning policy that people should not be required to commute far from their homes to a place of work.

The village community, through their Residents Association, their Parish, District and County Councillors have strived for a sensible balance of development and the proposals included in the Local Plan and the emerging Village Plan are a direct result of 10 years of hard work of campaigning and lobbying.

**1.13 Outstanding Planning Issues**



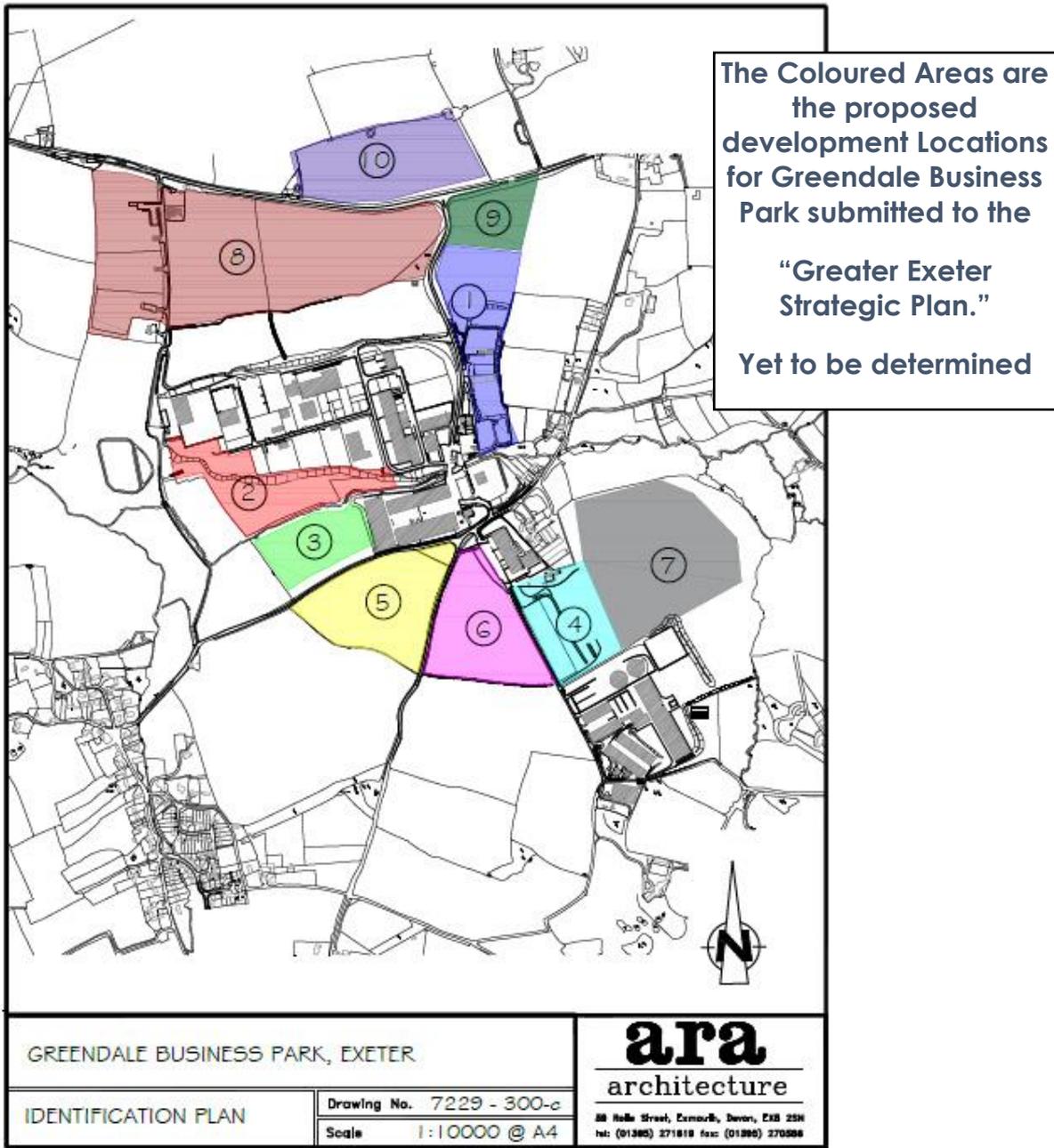
Picture 4 Outstanding Planning Issues

**1.13 Greendale Masterplan**

The recent submitted Greendale Masterplan clearly shows the owners continued expansion plans.

It is recognised the importance of Greendale Business Park but its unsustainable location in the open countryside is not supported by the Residence Association, Woodbury Parish Council and East Devon District Council, nor the National Planning Policy Framework regarding Sustainable development.

To provide clarity and certainty the Employment Boundary is required to support further the East Devon Local Plan.

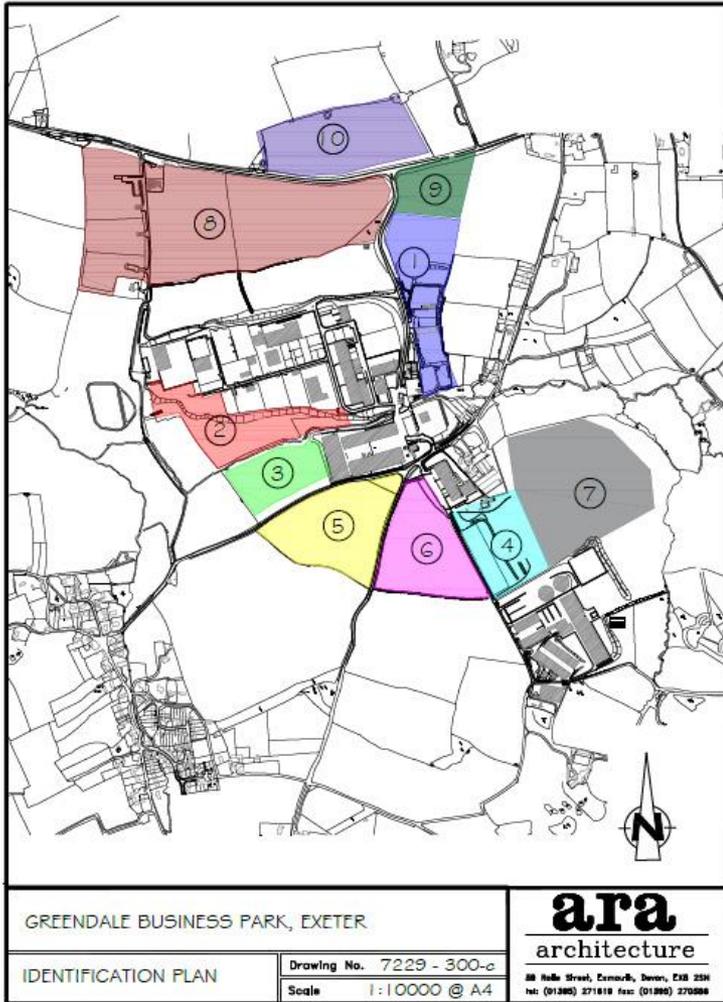


Picture 5 Employment Expansion Proposals

# Woodbury Salterton Residents Association

Relationship of the agreed landscaping proposals for Greendale Business Park

To be included in the Response to the Villages Plan 2017



# Greendale Review of Tree Screening

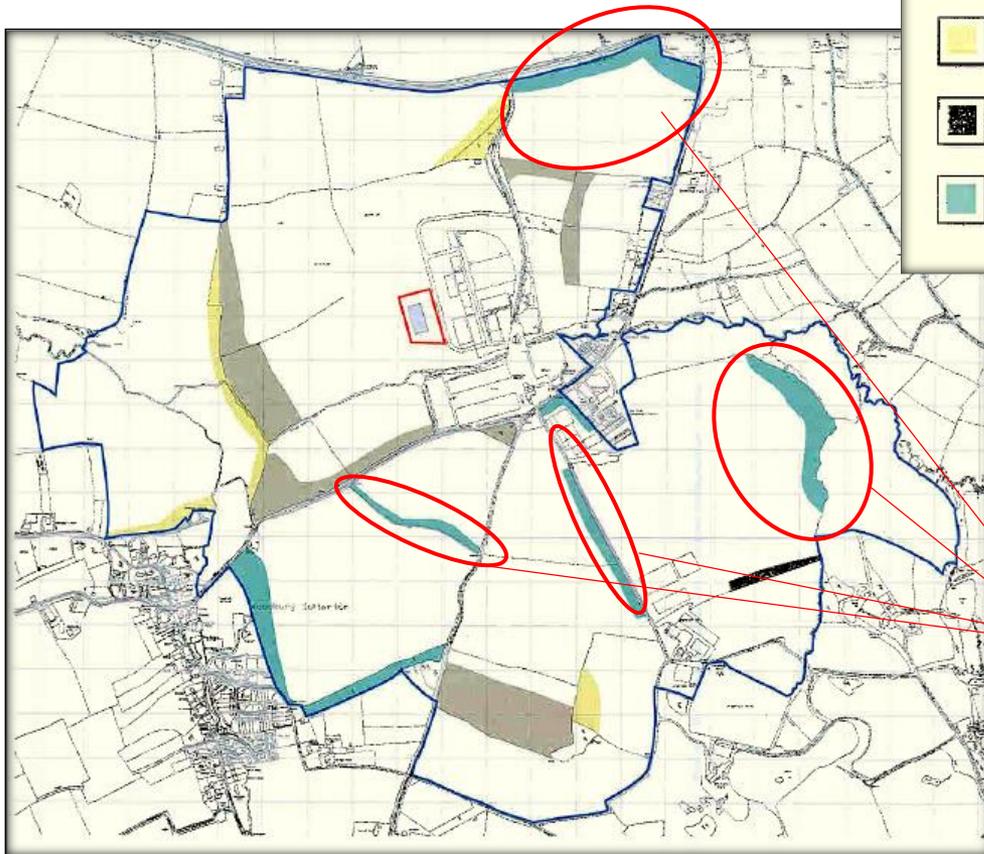
The Owners of Greendale Business Park have presented proposals for further expansion at the Business Park.

These have been published for the **EDDC Village Plan** and the **Greater Exeter Strategic Plan**

Therefore this review of the various tree planting schemes to understand the relationship between the recent proposals and the existing landscaping planning requirements.

*The coloured areas denote the proposed expansion areas*

## Landscaping Proposals in 2008



### **SITA Curb Recycling**

DCC Planning Application 2625/2008  
Refused

Approved on Appeal 08/0893CM Jan 2009

Areas agreed to be planted but still not  
carried out

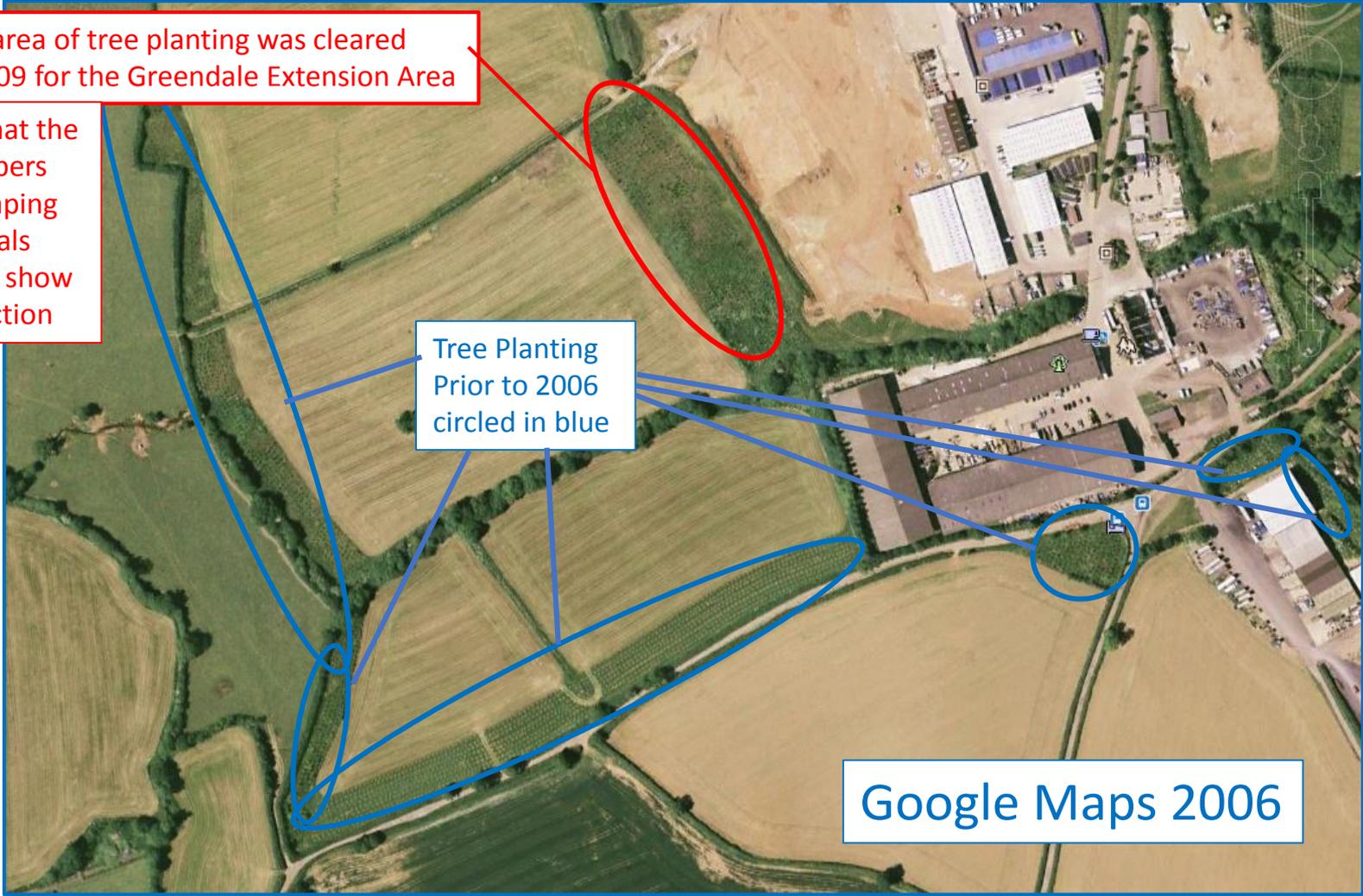


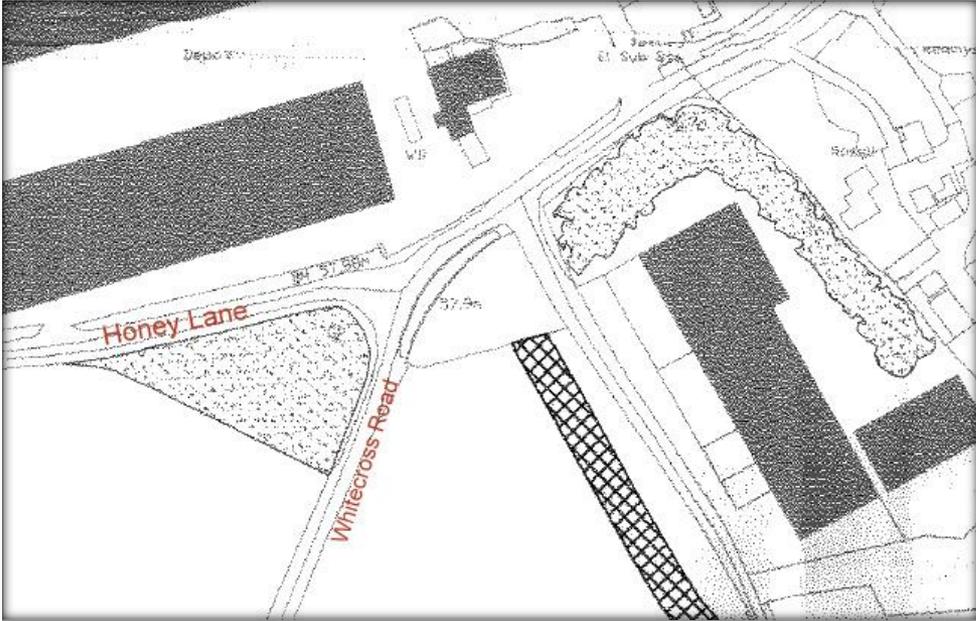
This area of tree planting was cleared  
In 2009 for the Greendale Extension Area

Note that the  
developers  
landscaping  
proposals  
did not show  
this section

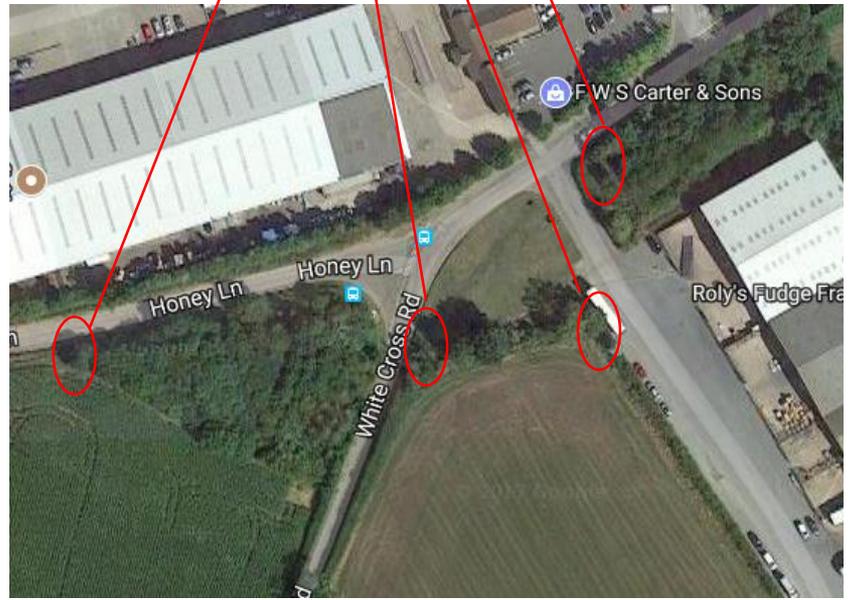
Tree Planting  
Prior to 2006  
circled in blue

Google Maps 2006

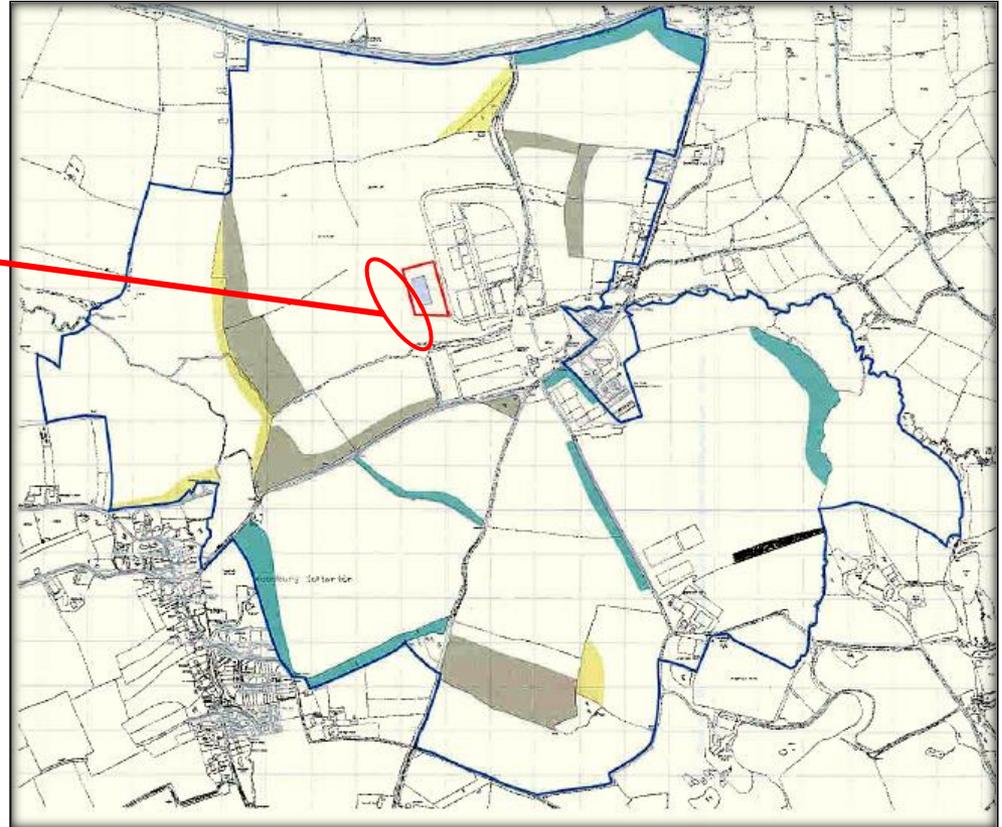


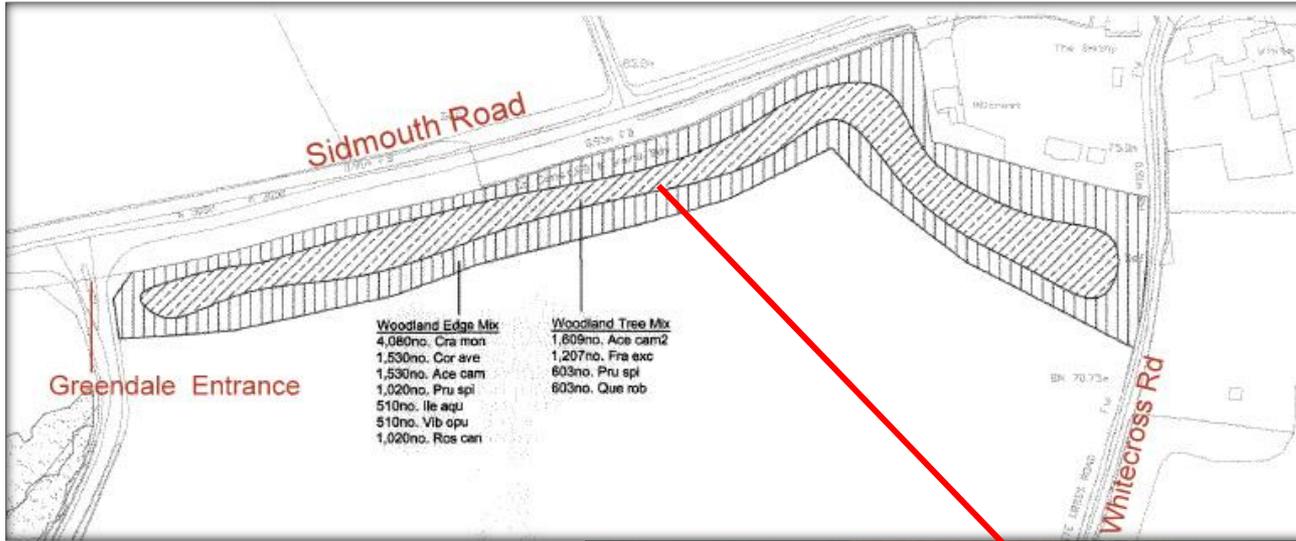


Trees and Hedging Removed



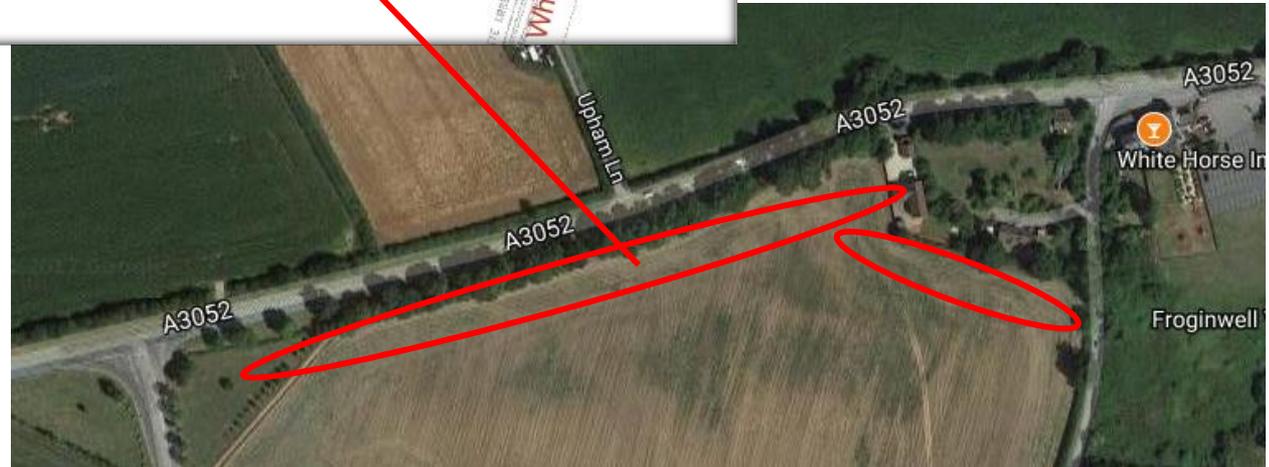
The Sita Landscaping Proposal in 2007/8 did not show this area of landscaped tree planting which would have been a significant planning consideration. These trees were removed in 2009

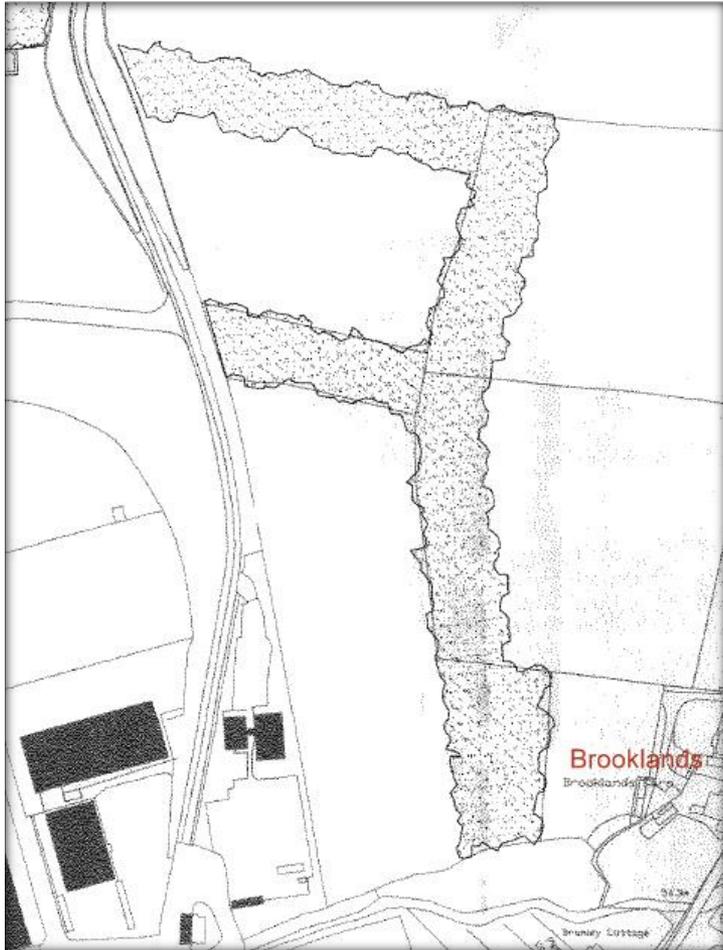


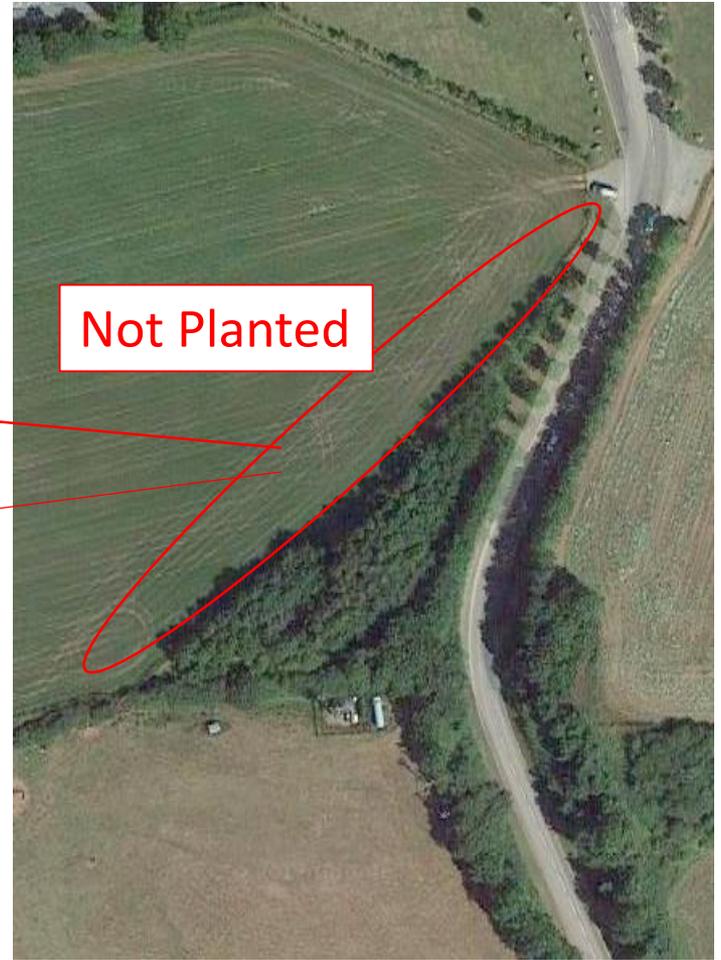
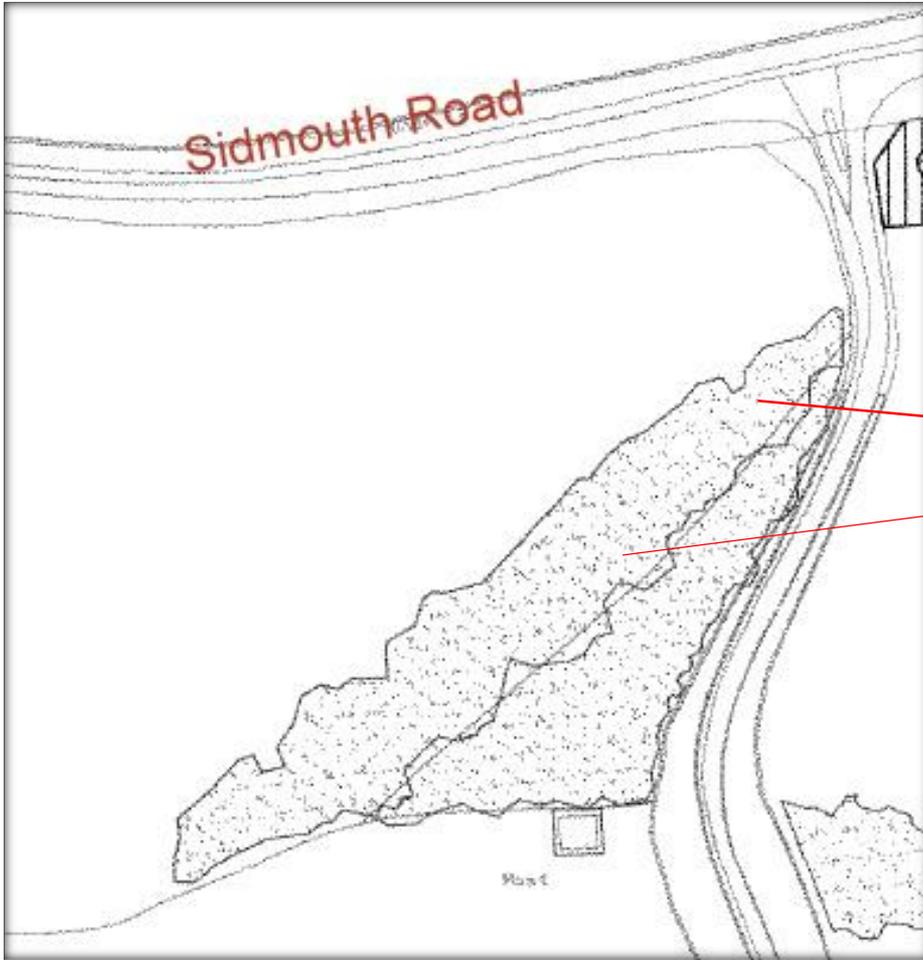


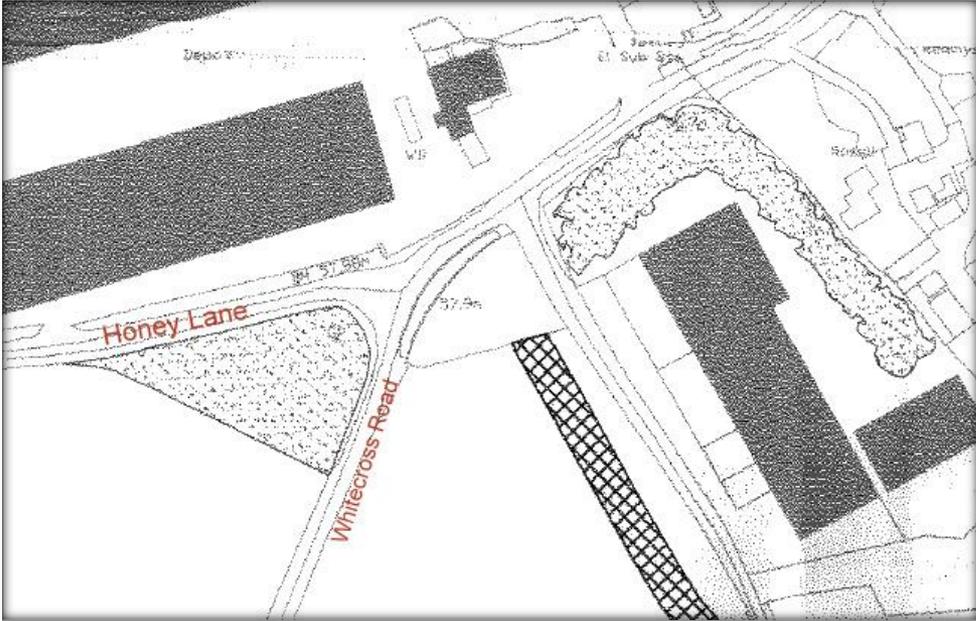
South of Sidmouth Road

The agreed planting not carried out

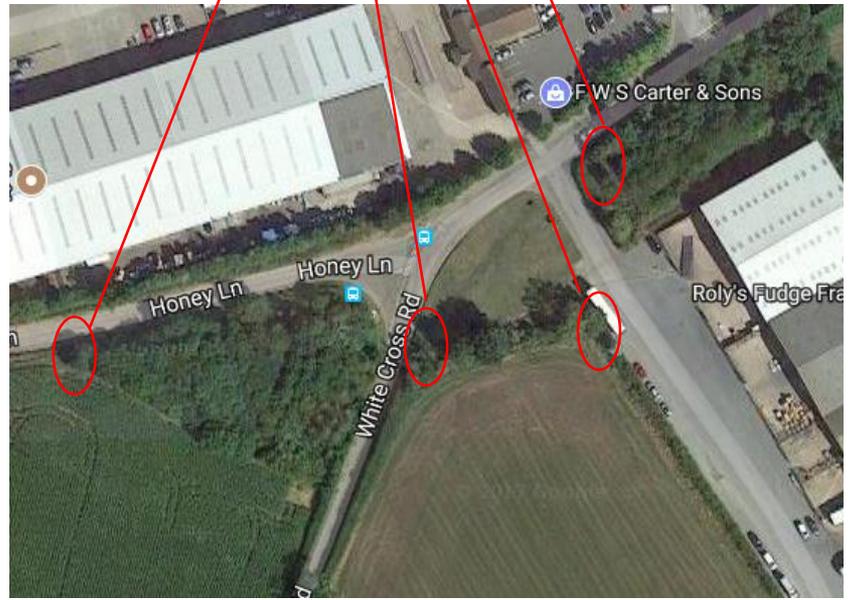


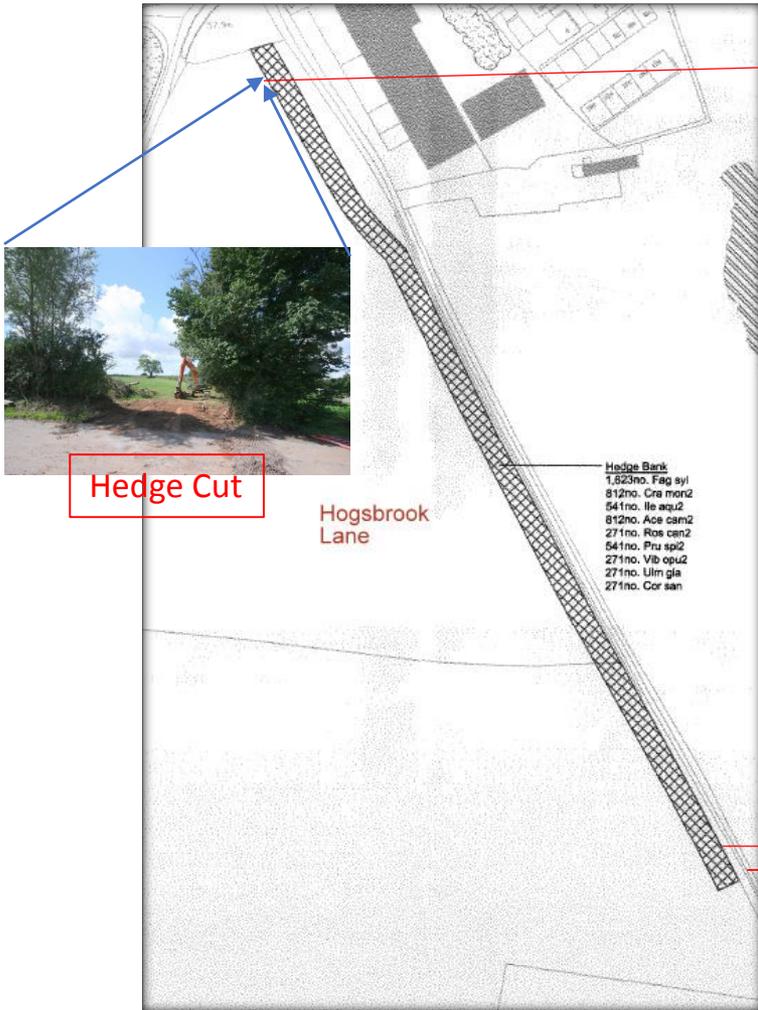






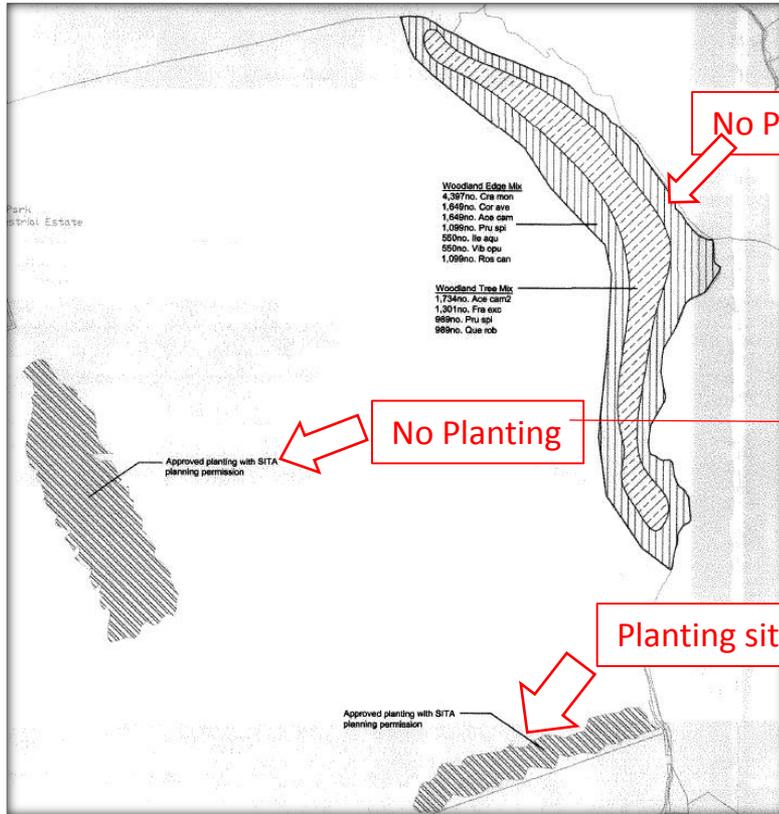
Trees and Hedging Removed





Hedge Planted  
But not as shown

The Proposed Hedge  
suggests a much  
larger and deeper than  
What was planted

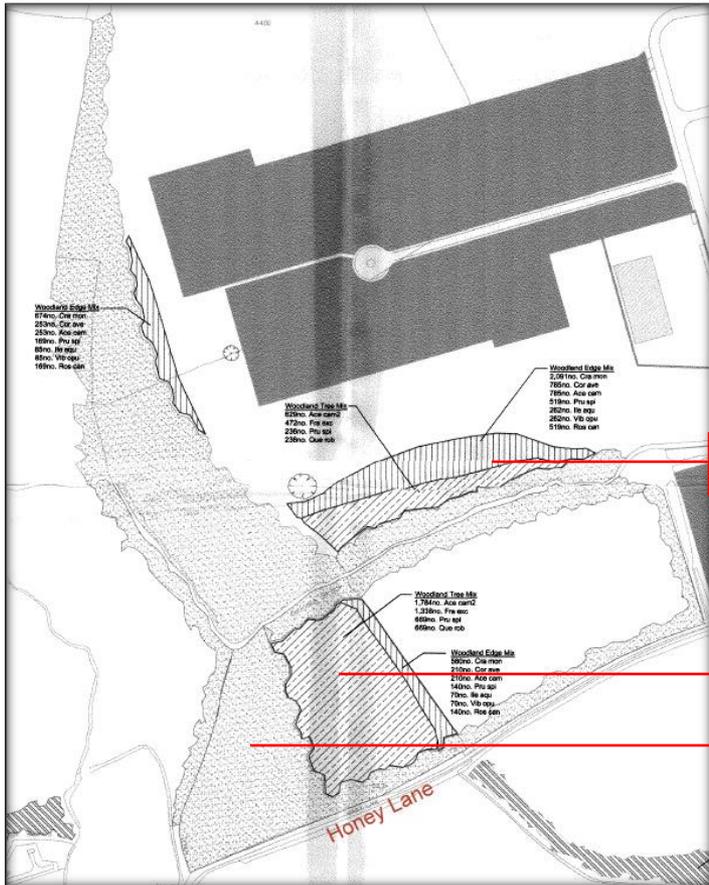


No Planting

No Planting

Planting site now the AD unit

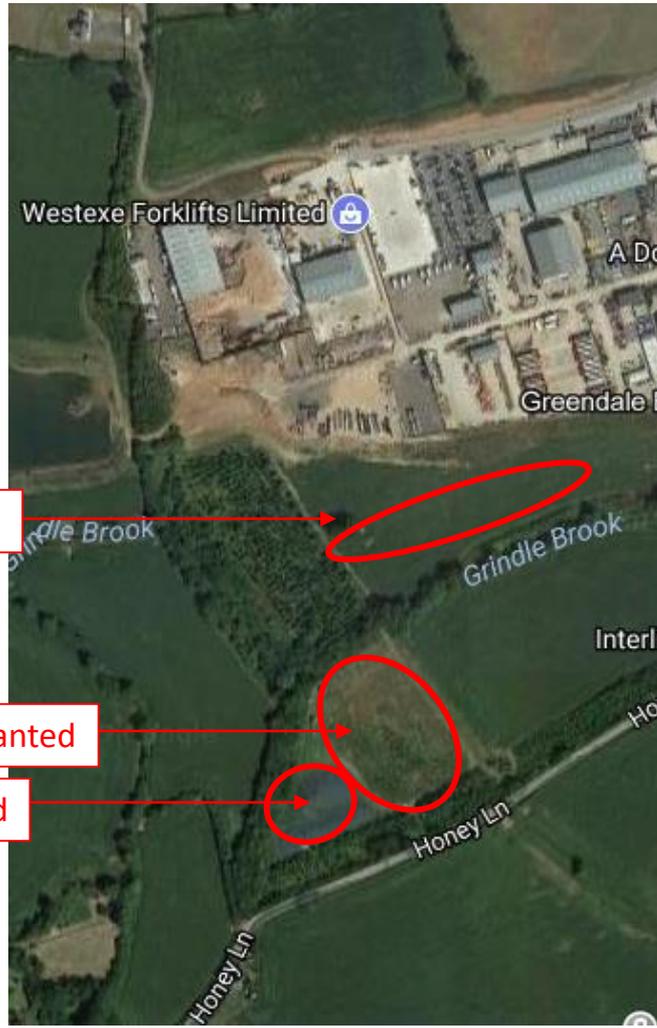


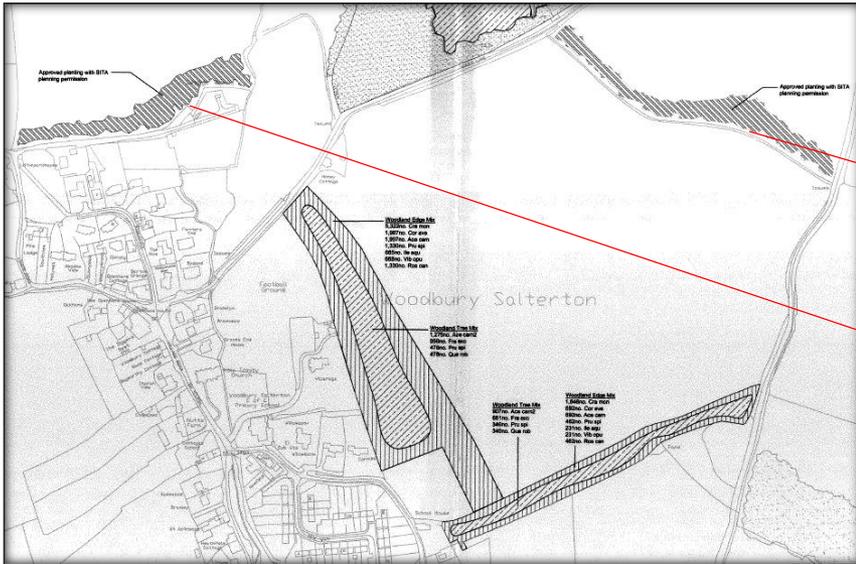


Not Planted

Recently Planted

Not Planted

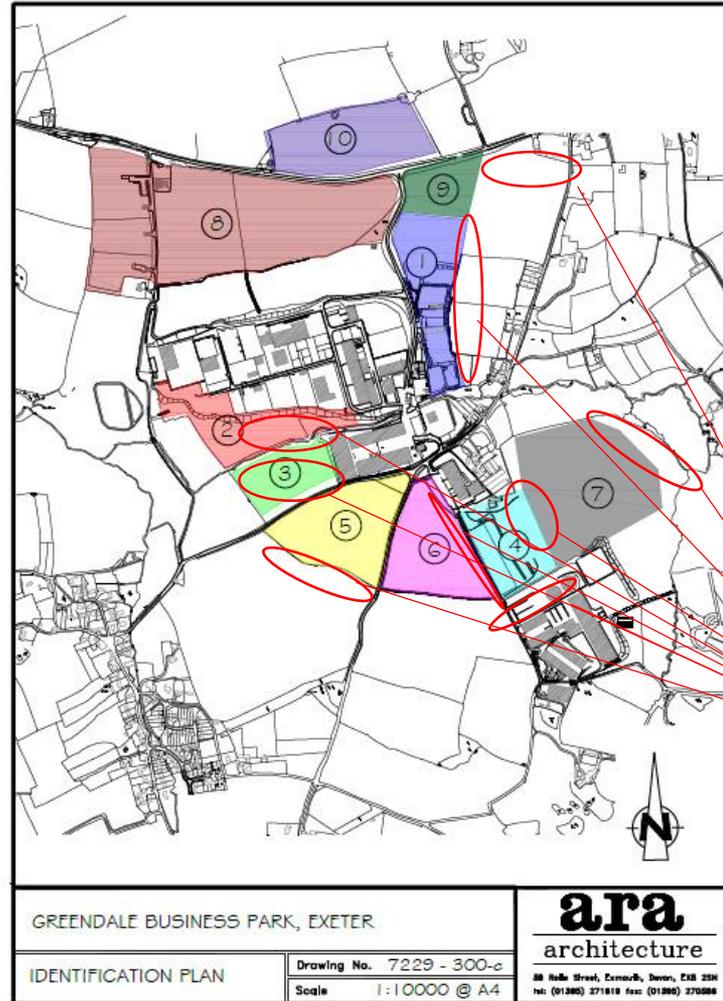




# Conclusion

Many of the proposed areas for the expansion of the Business Park have areas designated for tree planting

In the last 15 years proposals for tree planting have been included in planning conditions  
But not carried out.



If any further development is proposed at Greendale Business Park the Residents Association would like to include strict conditions on all the previous agreed planting and possibly protecting the landscaping with tree protection orders

Areas with agreed Tree Planting