

From Cllr Geoff Jung (Raleigh Ward Councillor) which includes the Village of Woodbury Salterton which encompasses Greendale Business Park.

I must take issue with the comments from my fellow District Councillor Mike Allan. I note he describes himself as 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. However, I must point out that he is not the Ward Councillor for either the wards that Hill Barton and Greendale Business Parks are located.

His comments should be read as an individual's comments and **not** the comments from the District Council.

He makes many statements (**in Bold**) that are quite simply wrong or misleading!

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.

This statement is misleading and incorrect (See 7.19 and 7.20 of the Adopted Local Plan)

Potential for Development on the A3052 Corridor

7.19 The A3052 highway runs from Junction 30 of the M5 motorway Eastward into East Devon. Adjacent to this road, on the Western side of East Devon, there are a number of employment sites, housing areas and also Crealy Adventure Park. Crealy is the largest free-standing tourist attraction in the District and is of great importance to the local tourism economy. Recent planning permissions granted at Greendale and Hill Barton business parks will help create new jobs for this part of the District.

7.20 We have looked at potential for further growth on this corridor, including the possibility of a second new town for up to 4,000 dwellings and also a smaller scale housing scheme of up to 1,000 dwellings. Development would, however, require very significant infrastructure improvements to address resulting congestion. New access roads, distributor roads and bridges over the M5 could be required. Public transport access would need to be enhanced. All of these would be expensive and securing relevant improvements would be very challenging. The level of investment required to support new and improved bus services or park and ride to mitigate additional traffic impacts on the corridor would be substantial and unlikely to be deliverable. Unlike the A3052, the Cranbrook, Skypark, Redhayes, Science Park developments will be linked by high quality walking and cycling routes and served by high quality bus and rail services. For these reasons and other broader impacts, a second new community option is not considered to be desirable. We are not proposing any significant new additional development on this corridor although we will keep land supply and demand issues under consideration and will review provision in the years to come.

The Local Plan clearly states that the 2 business parks are **NOT** to be considered for expansion following the applications for site expansions in 2009 as referred to in 7.19

The expansions to these parks were brought forward in 2009 as "exception" sites to the local plan due to the delays in development in the West End and Cranbrook.

They have never been included as strategic employment areas in the previous or current Local Plan for East Devon District Council.

To allow further expansion at these sites would jeopardise the Local Plan as development is required to be elsewhere in the district. Vast costs have been spent on providing the infrastructure for employment at Cranbrook and the West End and development is being further encouraged now that this area is being marketed as an "Enterprise Zone". Business

and employment opportunities are also needed to be concentrated close to the towns of East Devon.

The lack of residential neighbours means no loss of amenity.

As a resident of the rural village of Woodbury Salterton this statement is clearly incorrect by a simple visit to the village of Woodbury Salterton and Farringdon! My neighbours and many residents of my village, residents of Farringdon and many other residents living close to these 2 Industrial Estates are appalled by this statement! We have suffered from losses of amenity for many many years! To simply state that we do not exist is most upsetting!!

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.

Again, this is misleading and incorrect. (See section 7.6) of the Adopted East Devon Local Plan. It should be noted that the agreed and preferred location for employment is the "West End" which does not include The Parish of Woodbury or Farringdon.

7.6 East Devon's West End will accommodate a wide range of highly skilled, secure and well-paid jobs. This will ensure the overall development is of sub-regional and East Devon-wide importance. Every opportunity will be taken to draw the benefits of development, skills, training and wealth created in this part of the District, through into the rest of East Devon.

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.

I should point out that Councillor Allan does not speak on behalf of East Devon District Council as the Villages Plan has been through rigorous Officer input, rigorous debate, rigorous public consultation, and a rigorous Inspectors hearing, to finally arrive at a thorough and a clearly democratically decided Plan that will support the needs of East Devon for many years to come.

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.

Again, I must disagree with Cllr Allan's claim that approval of the draft villages plan including Greendale and Hill Barton would exacerbate the undersupply of employment. I and the Planning Policy Team believe it would do the absolute opposite if these 2 Business Parks were allowed to expand at the rate they have over the last 20 years. Providing jobs close to residential areas is a key principle of our local plan. Further increase at these parks without the infrastructure would exacerbate the well-known traffic and pollution issues on the A3052 and the investment of infrastructure elsewhere would have been spent unnecessarily and needlessly.

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.

This report was used to formulate the Local Plan and was written 6 years ago. These Business Parks Expansion areas were brought forward in 2009 against the local plan policy to fulfil an alleged shortfall in employment.

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 the last 6 years of extended development in the agreed expansion area, plus extra areas where agricultural buildings were alleged to be redundant have been converted for employment/industrial use, plus other areas developed within the open countryside without planning approval the period of expansion has run its 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.

This evidence is 6 years old and referring to Page 9 of the Local Plan "Setting the Context" Paragraph 2

This **Local Plan Document** 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 (see below) nor Greendale Barton 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.

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

Both Hill Barton and Greendale fail the "Golden Thread" of sustainable balanced of social economic and environmental issues. Both are some distance from towns and require private transport for the majority of workers, therefore they are in unsustainable locations.

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.

This statement I agree with. Large sections of these Business Parks are for storage or facilities that offer limited employment. Redeveloping some facilities could improve the employment numbers at these 2 sites, but strickly keeping inside the proposed Employment Area for these 2 sites

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.

This statement is most misleading. The concept of one job per new dwelling for East Devon is detailed in section 6.9 of the Local Plan

6.9 In the rest of East Devon employment provision will mostly be geared to serving local needs with a view to securing jobs close to existing homes so that people have the option of not needing to commute long distances to work. Local employment provision will be made at East Devon towns with an expectation that larger scale housing allocations will be matched with new jobs (around 1 for each home built). We estimate that, roughly speaking, 250 new homes could generate the need for around 1 hectare (or 2.5 acres) of employment land. We will take a broad view of the types of activity (retail, commercial, industrial, service sector, etc) that can be classed as 'employment' in making our land allocations; we do, however, see future B1 employment development (office developments), and jobs in this class, as being key.

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.

I totally agree with Councillor Allan on this point as new housing since the Local Plan has been agreed has not provided employment and the employment growth it was hoped for. The distribution is very unbalanced, being mostly in the West End of the district or at Greendale or Hill Barton and not as planned throughout the district.

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.

I am afraid that Councillor Allan misses the key point. Within the areas already approved for employment further development may be permitted but beyond that area it will be classed as Open Countryside.

The criteria already laid down within the Local Plan are fully sufficient to control and promote the appropriate development on these sites.

FWS Carter and Sons have claimed with many of the Planning Applications since the Local Plan was adopted in 2016 that it is silent on further development at Greendale Business Park. The recent Judicial Review that the owners have recently submitted refers to the lack of clarity for Greendale Business Park in the Local Plan and therefore the Planning Inspectors decision was "unlawful"

Therefore, it is very important to provide more clarity.

In conclusion I therefore fully support the amendments to the Villages Plan and request that the proposed plan is adopted in its entirety.

Cllr Geoff Jung
Raleigh Ward.