
From: Amy Roberts [REDACTED]
Sent: 29 January 2018 15:13
To: Planning Policy
Subject: Villages Plan - consultation on proposed Main Modifications - representations on behalf of Stuart Partners Limited
Attachments: Hill Barton Representations 2017.pdf; 141217-strategic-planning-committee-minutes.pdf; Hill Barton Plan REPS 2018.pdf

Dear Planning Policy

We write on behalf of Stuart Partners Limited with comments on the proposed main modifications to the East Devon Villages Plan that relate to Hill Barton Business Park (i.e. MM10 and MM11). Included with the submission is a copy of:

- Representations to the Villages Plan – Proposed Submission Plan on behalf of Stuart Partners Limited (April 2017)
- Hill Barton Extent of Authorised Uses and Areas with Scope for Expansion Plan
- Minutes of East Devon District Council’s Strategic Planning Committee Meeting on 14th December 2017

It will be recalled that we made a number of detailed observations on the Villages Plan – Proposed Submission Plan on behalf of Stuart Partners Limited in April 2017 in relation to land at and around Hill Barton Business Park (copy attached for ease of reference). We do not intend to rehearse our observations in full here but are very much of the mind that their concerns have not been addressed and still stand and, therefore, request that our client’s position be reiterated to the Inspector.

Inset Map

The proposed main modifications clarify that the line on the Hill Barton Business Park inset map is intended to show the extent of the land authorised for business uses. However, for the reasons set out below, the line as drafted is factually incorrect.

Planning permission was granted by East Devon District Council in April 2015 for the construction of a wood gasification plant for low carbon energy production at land to the north east of Stuart Way - planning application reference 14/1443/MFUL. The wood gasification plant was not a county matter – East Devon District Council was the determining authority and approved the application. Therefore, the area which benefits from the grant of planning permission has to be included within the Hill Barton Business Park Inset Map. We have produced a Plan entitled **‘Hill Barton Extent of Authorised Uses and Areas with Scope for Expansion Plan’** (attached), which shows the boundary as it should be drawn.

The observations made in April 2017 covered the area of Hill Barton Business Park now occupied by the wood gasification plant. Our paragraph 3.4 included an extract from the local planning authority’s *‘Assessment of Potential Appropriateness and Suitability of Greendale and Hill Barton Business Parks for Further Expansions’*, which stated that:

“The area of permission 14/1443/MFUL is excluded from the purple dotted line area in the Villages Plan as this is not seen as main stream employment use.”

As we responded at our paragraph 3.5, this is directly contrary to East Devon District Council’s own Local Plan, which states at paragraph 6.9 that:

“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.”

It will be appreciated that many of the uses accepted by the Council as being within Hill Barton Business Park in employment use are, by their nature, low employment density uses. 11 full time jobs are associated with the wood gasification plant.

For the reasons set out above, the Hill Barton Inset Map must be amended to include the wood gasification plant.

Scope for expansion of Hill Barton Business Park

We note that the inclusion of inset maps and policies for both Hill Barton and Greendale Business Parks was discussed at length by Members of the Strategic Planning Committee on 14th December 2017. It is very concerning that members commented that they had not been given all the appropriate information regarding the economic importance of the sites as detailed in the Economic Development Manager's comments when they made their decision for the sites to be included in the Villages Plan. Page 3 of the meeting's minutes (attached) states that some Members felt that the sites were critical for delivering the employment required for the district and the Villages Plan policies, as written, would prevent this from happening – it was not felt that the economic argument had not been put across strongly enough when balanced against the landscape policies.

We would also like to draw the Inspector's attention to a factual inaccuracy on page 9 of the minutes – bullet point 5: *"The owners of the two sites had not put forward representations for either sites expansion during the Local Plan process."* Representations were made on behalf of Stuart Partners Limited in May 2015 specifically on the then draft Policy E7 - Extensions to Existing Employment Sites – Representor Number 3452. It was made very clear that Stuart Partners Limited objects to the blanket exclusion of Hill Barton Business Park for any expansion and it was suggested that the last line of draft Policy E7 be deleted in its entirety.

In addition to some Members' considerable concerns, the Inspector should also note the Economic Development Manager's advice that Hill Barton and Greendale are strategic employment sites for the district and constraining them would exacerbate the current under supply of employment delivery. His recommendation, through the internal officer consultation process, was that the two sites should be removed from the Villages Plan. We fully support this recommendation and hope that this advice, plus Members' concerns, will be given due regard by the Inspector.

As we observed in April 2017, the '*Assessment of Potential Appropriateness and Suitability of Greendale and Hill Barton Business Parks for Further Expansions*' undertaken by East Devon District Council to inform and justify its position to restrict the growth of Hill Barton Business Park is a very high level assessment. Many of the observations made are very general in nature and do not stand up to detailed scrutiny. We, in response, made a number of detailed observations on behalf of Stuart Partners Limited relating to specific areas of land around Hill Barton (namely Areas HB02, HB03 and HB05), justifying why there is scope for some careful expansion into particular parts of these Areas. Our '*Hill Barton Extent of Authorised Uses and Areas with Scope for Expansion Plan*' (attached) identifies these areas.

The concerns of Members and East Devon District Council's Economic Development Manager, plus our evidence (April 2017), suggests that the conclusion to restrict the growth of Hill Barton Business Park has not been made robustly by the Council and that there is scope for expansion into some or all of the areas set out below, notably:

- **Area HB02** – as set out in our paragraphs 2.2 and 2.3, this area is very well contained and screened by substantial woodland on the boundary and any development would be viewed in the context of substantial industrial buildings that exist to the north east of the site and tucked behind/seen in the context of existing buildings at Hill Barton Business Park. Views across East Devon from the Pebblebed Heaths would not be affected – the local planning authority's assessment is not correct on this point.
- **Area HB03** – the factual inaccuracy of the Hill Barton Inset Map referred to above relates to Area HB03 of the local planning authority's Assessment. The wood gasification plant and waste transfer buildings located in this area are both significant buildings and so the landscape character has already been affected here and any further development would be viewed in the context of, and/or screened by, these buildings. Some careful expansion here would not affect the outstanding views across East Devon from the Pebblebed

Heaths - Hill Barton Business Park is largely obscured from view from high vantage points by extensive woodland, natural screening and the low lying topography.

- **Area HB05** - as set out in our Paragraph 4.3, this is low lying land with no tree coverage, which is contained by a high backdrop to the north. Access into this area is achievable from the main estate road at a point well inside the estate boundary, local views are transitional and the area is viewed against the backdrop of existing industrial buildings and in the context of the significant employment development at Waldren's Farm. Indeed, as set out in our paragraph 4.4, the local authority's Assessment implies that there is scope for some development within the parcel of land we have identified, concluding *'the western edges of the land would be less sensitive to development if it were not for the fact that they are extensively planted with trees.'* The western edges of our 'suggested area for expansion' are **not** extensively planted by trees – the Assessment is again factually incorrect in this respect. Views across East Devon from the Pebblebed Heaths would not be affected due to natural screening and, in any event, development would be seen in the context of Crealy Barton.

As set out above, we are very much of the mind that these observations still stand and are aware of no evidence being presented at the examination that changes the conclusions made. We request that our position be reiterated to the Inspector.

Thank you.

Kind regards

Amy Roberts

BSc, MSc, MRTPI

Principal Planner



**Representations to the East
Devon Villages Plan – Proposed
Submission Plan in Relation to
Section 18 – Land at and
around Hill Barton Business
Park**

Prepared For
Stuart Partners Ltd

Job Ref: 6181

April 2017



bell cornwell

CHARTERED TOWN PLANNERS

Bell Cornwell LLP, Sowton Business and Technology Centre,
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1 INTRODUCTION TO COMMENTS

- 1.1 The adopted East Devon Local Plan (2016) does not contain policy against which any future development at Hill Barton Business Park will be considered – this will be the job of the forthcoming Villages Plan. As drafted, there is no specific policy for Hill Barton Business Park in the Villages Plan and it is clear from the draft wording that it is not the current intention to support any future expansion. For the reasons set out below, we strongly urge the local authority to reconsider this approach.
- 1.2 In their previous representations, Stuart Partners Ltd rehearsed in detail that there is a significant mis-match between supply of certain forms of employment land and demand in East Devon – a problem that has been flagged up time and time again but that is not being dealt with. We do not intend to repeat all previous comments here but include for information a copy of representations made on behalf of Stuart Partners Ltd to East Devon District Council in September 2016 (with the relevant section highlighted) which still stand (Appendix 1).
- 1.3 In essence, the position is that whilst the Council has made provision for the delivery of office and warehousing space, it is clear that there is a shortage of space available and planned for the type of uses with which Hill Barton is associated. These uses play an important role in the local economy and it is therefore vital that proper provision be made for them in the right location i.e. close to their markets and transport networks.
- 1.4 It is clear that no further consideration has been given to this issue but that the points made previously are still very much valid. It is for this reason that a more pragmatic approach to further development at Hill Barton Business Park must be taken within the emerging Villages Plan.
- 1.5 As part of the current consultation, an *'Assessment of Potential Appropriateness and Suitability of Greendale and Hill Barton Business Parks for Further Expansions'* has been undertaken by East Devon District Council to inform and justify the emerging policy position to restrict the growth of Hill Barton Business Park. The following comments are made in response to the conclusions of this assessment.



1.6 It is clear from a review of the document that it is a very high level assessment that has been undertaken by the local authority. Many of the observations made are very general in nature and do not stand up to detailed scrutiny. We note that there are clear factual inaccuracies relating to a number of particular parcels of land. In light of this, there *is* some scope for careful expansion into certain areas around Hill Barton Business Park, namely areas HB02, HB03 and HB05, for the reasons summarised on our Suggested Hill Barton Expansion Masterplan (included as Appendix 2) and set out in detail in the following pages.



2 OBSERVATIONS ON THE SUITABILITY OF AREA HB02 ACCOMMODATE GROWTH

2.1 Area HB02 covers the fields to the north of Hill Barton Business Park. This area is identified in the local authority's assessment as having low suitability for further expansion, as it is considered that development in this location would adversely affect the tranquillity of the Clyst Lowland Farmlands Devon Landscape Character Area (LCA) and adversely impact the outstanding views across East Devon from the Pebblebed Heaths and the LCA.

2.2 Whilst we concur with these conclusions for the western section of HB02, Stuart Partners Ltd do not agree that the eastern section of the area marked on Plan HB02 cannot accommodate some development. It is clear from our research that there would be no visibility issues as a result of some carefully considered expansion into this area and no significant adverse impact on the character would result for the following reasons:

- It should be noted that there is substantial woodland on the boundary to the north and east, meaning that this area is very well contained and screened to views from the north and east. The natural screening that is already in place could be enhanced and reinforced to further enclose and screen the area from view.
- It is clear from aerial photographs that it is not purely open countryside beyond Area HB02 – please refer Appendix 2. Any development here would be viewed in the context of the substantial industrial buildings that exist at Wood Farm to the north east of the area (see photograph 1).
- In views from the south, any development would be tucked behind and/or seen in the context of the existing buildings at Hill Barton Business Park.



- Any development within the eastern part of Area HB02 would also be partially screened by, and viewed in the context of, the very large wood gasification plant and waste transfer buildings that exist to the south east of the area (and which are located within assessment Area HB03 – details below). It will be noted from Photographs 2, 4 and 5 that these are buildings of considerable size.



Photograph 1 – existing industrial buildings at Wood Farm



Photograph 2 – view south east from Area HB02

2.3 In terms of the views across East Devon from the Pebblebed Heaths, we are unclear as to why these views are given an ‘outstanding’ status within the assessment. It is recognised that views from this direction, and which are from within the AONB, have the potential to be sensitive to change. However, it needs to be recognised that the area around Hill Barton is not subject to any landscape designations. Furthermore, the topography of the land around Hill Barton means that, in reality, development within the area of land we have identified is most unlikely to significantly adversely affect views from the Pebblebed Heaths. Notwithstanding this, we have visited the various vantage points from the Pebblebed Heaths, including the key viewpoints at Woodbury Castle, to assess how Hill Barton Business Park sits within the views across East Devon and conclude that the vast majority of Hill Barton is obscured from vantage points by extensive woodland and natural screening. Furthermore, any parts of the business park that are just visible, such as the Still building, are seen in the context of Crealy Barton. Some careful expansion into the eastern part of Area HB02 would not affect the outstanding views across East Devon from the Pebblebed Heaths – the Assessment is not correct on this point. Please refer to annotated Photograph 3, which clearly demonstrates these points.



Photograph 3 – view towards Hill Barton from the direction of the Pebblebed Heaths (Woodbury Castle car park)

- 2.4 In conclusion, some carefully considered expansion in to the eastern section of HB02, as shown on our Suggested Hill Barton Expansion Masterplan and Plan HB02 (included as Appendix 3), would be appropriate to help to meet current and future demand for additional industrial floorspace in East Devon and should be supported within the Villages Plan.



3 OBSERVATIONS ON THE SUITABILITY OF AREA HB03 TO ACCOMMODATE GROWTH

3.1 The boundary shown on the Draft Villages Plan Hill Barton inset map is incorrect, in that it does not accurately show the extent of authorised business uses at Hill Barton.

3.2 Within Area HB03, planning permission has been granted and implemented for:

- Wood gasification plant – reference 14/1443/MFUL
- Waste transfer building – reference 16/1582/CM

3.3 Please refer to our Plan HB03 at Appendix 4, which identifies the part of Area HB03 in which these permissions have been implemented.

3.4 The local authority's Assessment states that:

“The area of permission 14/1443/MFUL is excluded from the purple dotted line area in the Villages Plan as this is not seen as main stream employment use.”

3.5 This is directly contrary to East Devon District Council's own Local Plan, which states at paragraph 6.9 that:

“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.”

3.6 Within this context, the existing approved uses can clearly count as being employment uses. Therefore, given the presence of existing employment generating industrial development on site, this part of HB03 should be included within the identified extent of authorised business uses, and the Villages Plan Inset Map (Section 18) should be amended accordingly – please refer to our Plan HB03.

3.7 The assessment goes on to makes the same general comments for HB03 as for HB02: i.e. that further development would be likely to adversely affect the outstanding views



across East Devon from the Pebblebed Heaths and Farmland Devon Landscape Character Area. This is not correct.

- 3.8 The wood gasification plant and waste transfer buildings are both significant buildings in situ and so the landscape character has already been affected here – please refer to Photographs 4 and 5. Any further development would be viewed in the context of, or be screened by, these buildings.



Photograph 4 – Wood gasification plant



Photograph 5 – Waste transfer building

- 3.9 We agree that further development in the far eastern area of HB03 (as shown on our Plan HB03 at Appendix 4) would not be appropriate as this is the more visually sensitive part of the land parcel but there clearly is scope for careful expansion into the western area we have identified. As was the case for Area HB02, Hill Barton is largely obscured from view from key vantage points within the Pebblebed Heaths by extensive woodland, natural screening and the low lying topography– please see Photograph 6. Any parts of the business park that are just visible, such as the Still building on the extreme western side of Hill Barton, are seen in the context of Crealy Barton. Some careful expansion into the western part of Area HB03 would not affect the outstanding views across East Devon from the Pebblebed Heaths – the assessment is not correct on this point.



Photograph 6 – view towards Hill Barton from the direction of the Pebblebed Heaths (Woodbury Castle car park)

3.10 In conclusion, the western area of Area HB03, as shown on our Suggested Hill Barton Expansion Masterplan and Plan HB03, should be included in the extent of authorised business uses at Hill Barton. Carefully considered expansion in this location would be appropriate to help to meet current and future demand for additional industrial floorspace in East Devon and should be supported within the Villages Plan.



4 OBSERVATIONS ON THE SUITABILITY OF AREA HB05 TO ACCOMMODATE GROWTH

- 4.1 The local authority's assessment makes the same general conclusions for Area HB05 as for Areas HB02 and HB03: i.e. that development in this area would be *'highly likely to adversely affect the outstanding views across East Devon from the Pebble Bed Heaths and Farmland Devon Landscape Character Area.'*
- 4.2 It is agreed that part of HB05 – the northern section annotated on our Plan HB05 (please see Appendix 5) – is not suitable for any expansion of the Business Park as this is higher land which is therefore more visible but which also acts as a natural backdrop and screen, serving to curtail views towards Hill Barton from the south.
- 4.3 The same, however, cannot be said for the southern and eastern parts of the site, shown hatched on the attached masterplan and Plan HB05. Some careful expansion in these parts of Area HB05 would be acceptable, for the following reasons:
- This area comprises around 25 acres of low lying land with no tree coverage and is land contained by the high backdrop and screen to the north. It should be noted that under the provision of the existing permissions for the area, the area of higher land on the northern boundary of this area will be increased in height by a further six metres and thus its screening potential will be increased by the equivalent of an additional two storeys.
 - In addition there is the ability to add reinforced and enhanced structural landscaping to the south and east to further screen any development of this area to views from the A3052 and beyond.
 - Access into this area is achievable from the main estate road at a point well inside the estate boundary.
 - The southern boundary of land fronts onto the A3052. Local views are transitional and when travelling west along the A3052 the area is viewed against the back drop of the existing industrial buildings and also in the context of the significant employment development at Waldron's Farm to the



immediate south east (see photograph 7 and our Suggested Hill Barton Expansion Masterplan). In other words, it is not simply open countryside beyond the existing boundary to the park – there is effectively a large complex of buildings to the east – please refer to our Suggested Hill Barton Expansion Masterplan.



Photograph 7 – view of Waldron's Farm travelling west along A3052

- 4.4 Indeed, the local authority's assessment implies that there is scope for some development within the parcel of land we have identified, concluding *'the western edges of the land would be less sensitive to development if it were not for the fact that they are extensively planted with trees.'* Please note that the western edges of our 'suggested area for expansion' are **not** extensively planted by trees – the assessment is factually incorrect in this respect. Therefore, the conclusion that certain parts of Area HB05 would be less sensitive to development stands.
- 4.5 We would finally like to draw your attention to the photographs of the views towards Hill Barton Business Park from the Pebblebed Heaths. This photograph was taken from the main visitor car park at Woodbury Castle, the most important visitor point on the



Pebblebed Heaths and the only one with views towards Hill Barton. As Photograph 8 shows, some careful expansion into the southern part of Area HB05 would not affect the outstanding views across East Devon from the Pebblebed Heaths – the assessment is not correct on this point. The southern part of Area HB05 is obscured from view by extensive woodland and natural screening and, regardless of this, would be seen in the context of Crealy Barton – please see Photograph 8.



Photograph 8 – view towards Hill Barton from the direction of the Pebblebed Heaths (Woodbury Castle Car Park)

- 4.6 In conclusion, there is scope for carefully considered expansion into the southernmost area of Area HB05, as shown on our Expansion Masterplan and Plan HB05. This would be appropriate to help to meet current and future demand for additional industrial floorspace in East Devon and should be supported within the Villages Plan.



5 SUGGESTED POLICY WORDING FOR HILL BARTON BUSINESS PARK TO BE INCLUDED IN THE VILLAGES PLAN

- 5.1 In light of the very real problems concerning employment land supply and demand in East Devon and the considered analysis of the relevant sections of the Hill Barton and Greendale Expansion Assessment, some carefully controlled expansion of Hill Barton Business Park should be supported within the Villages Plan within the specifically identified areas shown on our masterplan and Plans HB02, HB03 and HB05.
- 5.2 The following wording is suggested for inclusion within Section 18– Land at and around Hill Barton Business Park:

“Development for employment activities will be allowed in the specific areas identified as X, Y and Z on the inset plan. As part of any development, structural screening must be provided or enhanced on the external boundaries.”



**APPENDIX 1 – ANNOTATED COPY OF REPRESENTATIONS MADE ON
BEHALF OF STUART PARTNERS LTD TO EAST DEVON DISTRICT COUNCIL
IN SEPTEMBER 2016**



APPENDIX 2 - SUGGESTED HILL BARTON EXPANSION MASTERPLAN



APPENDIX 3 - AREA HB02 PLAN



APPENDIX 4 - AREA HB03 PLAN



APPENDIX 5 - AREA HB05 PLAN

EAST DEVON DISTRICT COUNCIL

Minutes of a meeting of the Strategic Planning Committee held at Knowle, Sidmouth on 14 December 2017

Attendance list at end of document

The meeting started at 3:00pm and ended at 4.25pm.

The meeting was not audio recorded due to there being no recording facility available in the meeting room.

***24 Public speaking**

The Chairman welcomed everyone present to the meeting. There were no members of the public present who wished to address the Committee.

***25 Minutes**

The minutes of the Strategic Planning Committee meeting held on 27 November 2017 were confirmed and signed as a true record.

***26 Declarations of interest**

Cllr Paul Skinner, Minute *27 – Main modifications to the East Devon Villages Plan Interest - Personal

Reason: Knows the owners of Greendale Business Park and Hill Barton Business Park

***27 Main modifications to the East Devon Villages Plan**

Prior to inviting the Service Lead – Planning Strategy and Development Management to introduce the item, the Chairman read out an email from Cllr Geoff Jung, which the Committee agreed to be appended (appendix 1) to the minutes of the meeting.

The East Devon Villages Plan, which was submitted to the Planning Inspectorate in June 2017 for examination, had been subject to oral hearing sessions in November 2017. Following on from these sessions, a schedule of main modifications had been produced by the Inspector for consultation. Members noted that modifications to Plans were not unusual and to be expected. The Inspector would consider any representations received during the consultation before finalising her report on the Plan - she had set out a timetable for the consultation on the main modifications to run from 18 December 2017 to 2 February 2018. The expectation was that subject to the main modifications being incorporated into the Plan, it should be fit for adoption in spring 2018.

Members considered the Service Lead – Planning Strategy and Development Management's report summarising the modifications and advising of the next steps to Plan adoption. The modifications did not seek to alter the broad approach taken in the Plan; they strengthened and clarified the approach, ensuring stronger policy links between the Villages Plan and the adopted Local Plan. The modifications included:

- A policy for Built-up Area Boundaries for villages;
- A policy for Greendale and Hill Barton Business Parks;
- Amendment to Beer and Colyton village/town centre vitality policies;
- Inclusion of a monitoring plan.

Points raised during discussion on the proposed modifications to the Villages Plan included:

- Clarification was sought as to where the Villages Plan sat in relation to the Local Plan and the Greater Exeter Strategic Plan (GESP). In response, the Service Lead advised that the Villages Plan formed part of the documents that sat alongside the Local Plan and the GESP would sit above the Local Plan. Some of the strategic policies within the Local Plan would eventually be superseded by policies in the GESP.
- The process for amending a Neighbourhood Plan Built up Area Boundary was queried. In response, the Service Lead advised that the legislation did not allow for 'made' Neighbourhood Plans to be changed and it would therefore need to be taken back through the Neighbourhood Plan process, including examination and a referendum.
- Concern raised that the words 'urban quality' were being used to describe the village of Sidbury - it was felt this implied the settlement was similar to a town or city. In response, the Service Lead advised that when the Plan was hopefully submitted to Council for adoption in the spring 2018, it was possible for very small/minor text amendments to be made, however, caution was given that the Council would want to be very careful about avoiding any challenges this could raise as a result.
- The inclusion of inset maps and policies for both Greendale and Hill Barton Business Parks were discussed at length:
 - It was considered that including BUABs for the two strategic employment sites was not in accordance with the Local Plan and the wording used within the policies would prevent the two sites from any expansion. In response, the Service Lead advised that the boundaries shown for both sites in the Villages Plan were for information purposes only and were not policy designations. Both sites were in the open countryside in the Local Plan and the Inspector was suggesting that the relevant policies within the Local Plan would be used to determine planning applications for both sites.
 - A couple of the Committee Members took issue with the reference to 'in particular Strategy 7 of the East Devon Local Plan (Development in the Countyside)' in the new proposed policies VP04 and VP05, as it was felt to be unnecessary. In response, the Service Lead advised that the legislation did not allow the Council at this stage of the examination process to challenge or amend the modifications put forward by the Inspector; however a submission could be sent from the Committee in response to the consultation advising of Members preferred wording to the policy.
 - It was suggested that the sites should be treated as brownfield employment sites and not greenfield sites and that there should be flexibility to allow for appropriate development within and expansion of the sites. The Service Lead advised that both sites were clearly brownfield but this did not change the fact that they were in the open countryside and that developments at them would be considered as development in the open countryside under the policies of the Local Plan.
 - It was commented that Members had not been given all the appropriate information regarding the economic importance of the sites as detailed in the Economic Development Manager's comments when they had made their decision for the sites to be included in the Villages Plan. In

response, the Service Lead and Economic Development Manager advised Members of the internal officer consultation/engagement process that was undertaken when developing documents such as the Villages Plan. The process had never entailed formal internal consultations and the reporting of these to Members.

- The owners of the two sites had not put forward representations for either sites expansion during the Local Plan process and it had been agreed by Council at that stage that the two sites should not have BUABs or allocated expansions to prevent inappropriate development from taking place – the Villages Plan reiterated this decision.
- Some Members felt that the sites were critical for delivering the employment required for the district and the Villages Plan policies, as written, would prevent this from happening – it was not felt that the economic argument had been put across strongly enough when balanced against the landscape policies.
- The Service Lead advised that there were a number of key strategic employment sites within the district and that the employment allocations within the Local Plan would more than deliver the required employment figures for the district. It was recognised that some of the sites were constrained, however work was being undertaken to unlock and deliver those sites. The Villages Plan reinforced what was already in the adopted Local Plan.
- It was queried whether the two sites were the only two business parks located in the open countryside. In response, the Service Lead advised that there were a number of business parks in the countryside, however these were a fraction of the size of the two sites being discussed.
- In response to a question, regarding when a review of the Local Plan would commence, it was advised that this would happen once the Greater Exeter Strategic Plan was sufficiently advanced. A lot of the evidence used to develop the Strategic Plan would inform the review of the Local Plan.
- It was acknowledged that the two sites were important to the district's economy, however they were both constrained by the road infrastructure and their impacts on neighbouring properties/settlements and the wider landscape. Any expansion needed to be appropriate and delivered in accordance with the Local Plan policies. Applications had previously been approved as departures from the Local Plan where they were considered appropriate and the benefits of the development outweighed the Local Plan policies.
- The Economic Development Manager advised that they were strategic employment sites for the district and constraining them would exacerbate the current under supply of employment delivery and therefore his recommendation, through the internal officer consultation process, had been that the two sites should be removed from the Villages Plan.
- In response to a request that representations received during the officer engagement process when producing documents such as the Local Plan be made available to Members, it was advised that the process could be reviewed to make the information available to Members. However, it was stressed that documents such as the Villages Plan were Council documents and were therefore prepared balancing all the expert views received and evidence available. The Service Lead agreed to

incorporate the comments from internal consultees into future reports when bringing forward policy documents for Members consideration.

RESOLVED:

1. that the main modifications to the East Devon Villages Plan, as set out in the committee report, and updated sustainability appraisal, be consulted upon from 18 December 2017 to 2 February 2018 (consultation responses received would be submitted straight to the Inspector for consideration in her final report).
2. that the Inspector be sent a submission from the Strategic Planning Committee during the consultation period on the main modifications to the Villages Plan asking her to consider excluding the words 'in particular Strategy 7 of the East Devon Local Plan (Development in the Countryside)' from the new polices VP04 and VP05, as the Committee did not consider this to be necessary as all relevant policies within the Local Plan would apply to the two employment sites concerned.

Attendance list

Committee Members:

Councillors

Phil Twiss - Chairman

Graham Godbeer – Vice Chairman

Mike Allen

Colin Brown

Jill Elson

Ian Hall

Mike Howe

Philip Skinner

Also present (present for all or part of the meeting):

Councillors:

Brian Bailey

David Barratt

Paul Carter

Paul Diviani

Peter Faithfull

Steve Hall

Officers present (present for all or part of the meeting):

Matt Dickins, Planning Policy Manager

Ed Freeman, Service Lead – Planning Strategy and Development Management

Rob Murray, Economic Development Manager

Shirley Shaw, Planning Barrister

Hannah Whitfield, Democratic Services Officer

Mark Williams, Chief Executive

Apologies:

Councillors
Susie Bond
Geoff Jung
Rob Longhurst
Geoff Pook
Brenda Taylor
Mark Williamson

Chairman Date.....

Appendix 1

From: Cllr Geoffrey Jung
Sent: 13 December 2017 13:00
To: Cllr Phillip Twiss
Subject: Strategic Planning Meeting Tomorrow

Dear Phil.

Please accept my apologies for this meeting

As you know I very much would like to have attended the Strategic Planning meeting on the 14th Dec but due to a prior engagement in London I am unable to attend.

I have held a key interest in our Local Plan and the Villages Plan for a considerable time. We have now an approved local plan which is proving most efficient in providing clarity in determining planning applications.

The Village Plan will provide further clarity to the areas that were referred to in the Local Plan to be included in the proposed Villages Plan. There are so many references to the Villages Plan in our Local plan it would be a travesty not to proceed in agreeing the Planning Inspectors suggestions and to submit the Village Plan for a further consultation period, and then finally adopt the proposed final draft as early as possible in the new year.

Councillor Rob Longhurst and I sat through the whole of the Inspectors hearings and I would like to thank Linda Renshaw and Matt Dickens and his whole team for their sterling work on this plan, and for the thorough defense and tenacity in the 2 days of hearings with the Inspector and developer's agents who were robustly questioning various aspects of the Villages Plan. They served our District Council well and we are very lucky to have such officers providing such a substantive and well put together document that has been agreed by the inspector with only minor changes.

The Local plan and now the Village Plan will both now provide the guidance for developers and our planning teams the required policies for the whole of the district for many years to come.

I fully support the recommendation to approve the Main Modifications and for it to go out for consultation for a 7-week consultation period.

Thank you

Cllr Geoff Jung

Hill Barton – Extent of Authorised Uses and Areas with Scope for Expansion Plan

