

East Devon Local Plan Examination Topic Paper

Topic Paper 3 – Employment

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This topic paper addresses housing matters set out in the East Devon Local Plan as submitted for examination in August 2013.

In a Letter to the Council dated 26 September 2013 the Local Plan Inspector advised:

“I would invite you to consider producing topic papers for housing, affordable housing and employment. It would be useful, in my view, and aid the efficient running of the hearings if the Council could, in these documents draw the different strands of evidence together and explain its position. I am unclear, for example, how the plan aims to address any shortfall in the provision of housing since 2006 and it would assist if you could explain why you consider it appropriate to split the district with regard to calculating a 5 year supply of housing when there is no provision for such an approach in national guidance. An update on the latest position with regard to housing and employment supply would also be useful.”

This topic paper addresses:

- Employment;

Separate Topic Papers will be produced addressing.

- Housing; and
- Affordable Housing.

All documents submitted or presented by East Devon District Council that are relevant to the Local Plan Examination are or will be referred to and will be accessible form links in the East Devon Local Plan Library, at:

<http://www.eastdevon.gov.uk/lplibraryver05.pdf>

All representations submitted to the Inspector can be viewed through the representation library at:

http://www.eastdevon.gov.uk/plg_lprelibrary4.pdf

Contents

1	INTRODUCTION	4
3	CURRENT AVAILABILITY OF EMPLOYMENT LAND	6
4	LINKING EMPLOYMENT LAND PROVISION TO FUTURE HOUSING GROWTH.....	7
5	EMPLOYMENT LAND DISTRIBUTION	8
6	EMPLOYMENT SITE ALLOCATIONS.....	9
	<i>West End Sites.....</i>	<i>11</i>
	<i>Axminster.....</i>	<i>12</i>
	<i>Exmouth.....</i>	<i>12</i>
	<i>Honiton.....</i>	<i>13</i>
	<i>Ottery St Mary.....</i>	<i>14</i>
	<i>Seaton.....</i>	<i>14</i>
	<i>Sidmouth.....</i>	<i>15</i>
	<i>Employment Site in Villages and Rural Areas.....</i>	<i>17</i>

1 Introduction

- 1.1 The East Devon Local Plan was submitted for Examination on 2 August 2013. At the suggestion of the Inspector there was also additional consultation on proposed changes to the plan in the Autumn of 2013.
- 1.2 This paper sets out, in a single report, the key Council evidence for Local Plan affordable housing provision. The report:
- a) cross-references to the Local Plan Policy and evidence that underpins plan policy,
 - b) cross-references to technical assessment that underpins evidence;
 - c) updates on further/ongoing work; and
 - d) updates on employment land supply in East Devon.
- 1.3 The East Devon Local Plan includes policy to provide around 150 hectares of land for employment purposes of which around 120 hectares will come forward through strategic allocations. As noted in the Local Plan East Devon's West End will be a focal point for job provision with a particular focus on encouraging strategic inward investment. 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.

2 Definitions of Employment Land

- 2.1 The Local Plan will take a broad view of the types of activity (retail, commercial, industrial, services sector etc) that can be classed as employment. This approach is informed by the NPPFs definition of economic development which identifies it as *'Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development)'*. Paragraph 161 of the Framework notes that local planning authorities should assess *the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development.*
- 2.2 Employment land is converted into land use sector types and these are either B-Use or Non-B-Use. The Local Plan and supporting papers seek to identify employment land using the definitions in the Tyms Study (p52):
- B-space sector – are jobs normally occupying offices, industrial and warehousing space that will require what is typically referred to as 'employment land', as defined as B-class uses in the Use Classes Order and sometimes known as 'business space' or 'B-space'
 - Non B-space sector – jobs such as education, health and retail which often require their own specialist sites and premises and are controlled separately in the planning process. These tend to be more service led jobs, and their expansion and location is likely to be dependent on housing and population growth.

3 Current Availability of Employment Land

- 3.1 The Employment Land Review 2013 identifies sites within East Devon that have vacant land and units within them. This review assesses the employment sites and provides an overview of each one with some key data on premises use, site constraints and planning history.
- 3.2 The Local Plan Employment Numbers report (Emp007) provides information on current employment land availability in the towns and uses information from other assessments and reports to justify the employment figures in the Local Plan. Other studies include those commissioned by the Council from Atkins (Emp002) and Roger Tym and Partners (Emp001). These studies consider site constraints and current availability of employment land.
- 3.3 The Employment Review will be updated annually and will be used to inform the Annual Monitoring Report.

4 Linking Employment Land Provision to Future Housing Growth

- 4.1 Linking employment land provision to future housing growth aspires to promote sustainable patterns of development linking residential development with employment and in turn supports one of the key plan objectives of reducing the need to travel by car for work. The aspiration reflects paragraph 37 of the NPPF to encourage development that reduces the need for people to travel for work and leisure activities.
- 4.2 Development of large scale schemes will in some cases generate the need for onsite services and facilities. The requirement for this provision is qualified by the suitability and availability of existing employment sites. The provision of employment with housing will be achieved through the applications process.

5 Employment Land Distribution

- 5.1 Strategic developments that are being brought forward in the Exeter and East Devon Growth Point area have the potential to deliver large scale and broad based growth and make a meaningful contribution to the economy. A focus for strategic economic development in East Devon is concentrated in the 'West End' of the district.
- 5.2 The shortage of development sites in Exeter has meant that the City has looked for significant expansion to the east of Exeter and in particular at the opportunities offered by the Science Park, Skypark, the Intermodal Freight Facility, Airport and Airport Business Park, which illustrates the importance of the 'West End' development sites in a sub regional context. The promotion of employment land in the 'West End' of East Devon is evident in both the *Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes - for public consultation July 2008* (Policy HMA4) and *Devon Structure Plan 2001 to 2016 (Policy ST17)* for about 100 Ha of employment land. Delivery of these strategic 'West End' sites has begun with commencement on site at Skypark and Science Park.
- 5.3 The concentration of the larger employment sites in the 'West End' of the District reflects the close relationship between Exeter City and East Devon and the sites proximity to a major sub regional economic centre and strategic infrastructure.
- 5.4 Aside from the larger employment sites, the Local Plan provides for more local employment provision at the towns of East Devon. The Tyms Study notes in paragraph 5.35 that the employment land identified should be treated as additional to the Growth Point developments in the West End. When considering the Tyms Study recommendation of 32 Ha of employment for the rest of East Devon, the net employment land identified in the Local Plan reflects this requirement and for some settlements is phased.
- 5.5 Distribution of new employment land in villages will be encouraged but no allocations have been made. Employment allocations are concentrated in the 'West End' and towns of East Devon.

6 Employment Site Allocations

Town/ Area	Site and Location	Site Number	Policy	Current Status and Commentary – Employment Allocations
West End	Intermodal Interchange	025	Strategy 15	Phase 1 of the intermodal interchange has planning permission. Remediation and servicing work has been done on site. An access road into the site has been developed but at this time Sainsbury's have put development 'on-hold'.
West End	Science Park	027	Strategy 16	This site has planning permission and development has begun on site. Eagle House is complete and occupiers are expected to move in the near future.
West End	Skypark	026	Strategy 19	This site has planning permission. A planning application for the first commercial occupier has also recently been approved and construction has started. The E.ON energy centre is operating on site.
West End	Exeter Airport Business Park(ii)	044	Strategy 18	This site does not have a current planning permission.
West End	Strategic Mixed Use Residential scheme	Various	Various	The mixed use residential schemes of Cranbrook, at Pinhoe and Blackhorse all provide for employment uses as well as housing. See housing table below for details.
Axminster	East of Axminster	E105	Strategy 20	Site does not have a permission but we are aware that land is fully optioned to Persimmon and that they have undertaken work to promote the site through the Local Plan process and they have also been in discussions with East Devon District Council, Devon County Council and Axminster Town Council about site development and ahead of preparing a planning application.

Town/ Area	Site and Location	Site Number	Policy	Current Status and Commentary – Employment Allocations
Axminster	Millwey Rise	015	Strategy 20	The site is already a busy commercial location accommodating mainly local/ regional companies, with occupiers such as Axminster Power Tools, Axe Valley Motors and Nu Type. There are some vacant plots on site.
Exmouth	Liverton Phase 2	017	Strategy 22	This site has planning permission. A builder's merchant is now operating on the site.
Exmouth	Liverton Phase 3	045	Strategy 22	This site does not have a current planning permission.
Exmouth	Goodmores Farm	W147	Strategy 22	A planning application has not yet been submitted on this site (as at November 2013) but the prospective applicants have undertaken pre-application consultation and it is expected that an application will be submitted soon.
Exmouth	Land South of Redgate	040A	E1	This site does not have a current planning permission.
Honiton	Land West of Hayne Lane	042	Strategy 22	This site does not have a current planning permission.
Honiton	Heathpark Industrial Estate	011	E1	The Heathpark Estate is located on the western periphery of Honiton, with access off the A35 close to the junction with the A30. Being positioned close to two arterial routes through East Devon has meant that Heathpark has become a popular location for small/ medium sized businesses and larger distributors. The site contains a mix of large detached buildings and terraced industrial units varying in age and styles. There are some vacant plots on site.
Ottery St Mary	Finnimore Industrial Estate	008	E1	Established industrial area to the west of Ottery St Mary containing a range of occupiers. There are vacant plots on site.

Ottery St Mary	Island Farm	C311	Strategy 24	This site has planning permission. There are two alternative schemes one for 165 houses and one for 185 houses on this site both with permission. The plan allocates 200 dwellings here. The smaller scheme provides for a care home.
Seaton	Land East of Harepath Road/Fosseway Site	E315 and 118B	Strategy 25	These sites have been the subject of two planning applications and refusals of permission. A Planning Appeal will be heard in respect of one of the applications, that includes B1 and B2 Uses, in December 2013. The application, subject of the appeal, is in respect to a mixed use proposal that includes Site E315 as well as the adjoining employment/recreation allocated Site 118B and other land.
Sidmouth	Alexandria Road	001	E1	The estate is made up of a number of plateaus and is quite densely developed. The majority of accommodation provided is relatively poor and access is not suitable for large vehicles. There are some vacant plots on site.
Sidmouth	Sidford	041A	Strategy 26 and E1	This site does not have a current planning permission.
Sidmouth	Sidford	041B	Strategy 26 and E1	This site does not have a current planning permission.

West End Sites

6.1 A number of the employment allocations in the West End have planning permissions including Skypark, Science Park and the intermodal interchange. The sites have begun implementing there permissions and developments have started on site. The mixed use residential schemes of Cranbrook, Pinhoe and Blackhorse have progressed through the planning system with some of the sites registering

completions. These sites provide for employment uses as part of their permissions and will be delivered over the plan period.

Axminster

- 6.2 In the Local Plan the vision for Axminster promotes larger scale housing growth to promote and be a catalyst for further commercial activity. The Plan promotes 8 Ha of strategic employment land for Axminster, 6.5 Ha of B-Use and 1.5 Ha for Non B-Use.
- 6.3 Policy E1 of the Local Plan identifies a non strategic allocation of 1.05 Ha. The land thought to be available based on the Employment Land TAFF is 0.37 Ha.
- 6.4 The employment land allocations in the Local Plan for Axminster are justified on the basis that Axminster has been allocated a large number of dwellings and the Local Plan is promoting employment land along with residential land to address the four key plan objectives for jobs and economic growth. The vision for Axminster is to promote larger scale housing growth to promote and be a catalyst for further commercial activity. The NPPF promotes minimising journey lengths for employment (Para 37) and positively and proactively encourages sustainable economic growth (Para 21). The Local Plan will promote Axminster as a self contained and increasingly significant and important East Devon town by safeguarding existing employment land and allocations and identifying further land to ensure the supply of a wide range of premises, including starter and next phase units.

Exmouth

- 6.5 The vision for Exmouth in the Local Plan promotes reducing out commuting through indigenous employment growth and tourism related development. The Tyms study identifies that Liverton Phase II (approximately 8 Ha) is likely to provide sufficient supply in the short to medium term. An additional 3 Ha is promoted at Liverton Phase III for the longer term. An additional 3 Ha of B-use land is promoted at Goodmores Farm. The amount of employment land is to create choice in employment and reduce out commuting.

- 6.6 Exmouth has the 5th lowest economically active population per hectare of existing B-Use employment land in the District behind Axminster, Honiton, Seaton and Ottery St Mary. With the proposed employment allocation, Exmouth will potentially have the third lowest economically active population per Ha of B-Use employment land behind Axminster and Honiton. Exmouth has an economically active population of 46.3%, above the East Devon town average of 42.3%.
- 6.7 The employment land allocations in the Local Plan for Exmouth are justified on the basis that Exmouth has the largest economically active population in East Devon and the vision for Exmouth is to reduce out commuting through indigenous employment growth. In the short to medium term the Tyms Study promoted that Liverton Phase ii should be sufficient. Liverton Phase iii is in the same ownership and its allocation will not impact on the viability and delivery of Phase ii.

Honiton

- 6.8 The vision for Honiton in the Local Plan promotes the town as a major employment and commercial focal point in East Devon reflecting its central position in the District and excellent road and rail links.
- 6.9 The Local Plan promotes a phased delivery of employment land with an initial release of 5 Ha and a second of 10 Ha if needed after a 5 year review. The Tyms Study promotes the need for approximately 5 Ha of new employment land in Honiton (7.58), but this figure does not consider the loss of 4.71 Ha of employment land at Ottery Moor Lane. Policy E1 of the Local Plan identifies a non strategic allocation of 3.2 Ha. The land thought to be available based on the Employment Land TAFF is 0.99 Ha.
- 6.10 The phased delivery of employment land enables flexibility in the policy to allow a response to changes in economic circumstance as identified in Paragraph 21 of the NPPF.
- 6.11 The promotion of B-Use employment land in Honiton is justified in relation to the key objectives set out in East Devon's Local Plan addressing jobs and economic growth and the requirements in the NPPF encouraging and not

impeding sustainable growth. The vision for the town is to promote it as a focus for economic development. The town is recognised by the Tyms Study as a local employment centre for East Devon with good transport links and has a high percentage of economically active people.

Ottery St Mary

- 6.12 The vision for Ottery St Mary in the Local Plan promotes modest employment growth primarily to support local needs. Ottery St Mary will see a loss of B-Use employment land due to the redevelopment of the Cutler Hammer site. Policy E1 of the Local Plan identifies a non strategic allocation of 2.2 Ha. The land thought to be available based on the Employment Land TAFF is 1.84 Ha.
- 6.13 The deliverability of 2 Ha of Non B-Use employment at Ottery St Mary is questionable as recent applications on the island Farm site does not promote this level of employment.
- 6.14 The Tyms Study notes that the B-Use market with Ottery St Mary is wholly based on local business with only a slim chance of a major occupier seeking space in the town.
- 6.15 Currently in Ottery St Mary there is no deliverable growth in employment land provision despite planned growth in the Local Plan for 300 new homes in addition to 130 homes granted on appeal recently.

Seaton

- 6.16 The vision for Seaton is to secure regeneration area development with additional employment provision in the town. As part of a development area to the North of the town the Local Plan is promoting approximately 2.2 Ha of B- Use Employment Land.
- 6.17 The Local Plan Employment Numbers report (Emp007) notes that approximately 1.84 Ha of B-Use employment land will be lost in Seaton to residential as a result of an existing permission on the Harbour Road site. The total employment land will only increase from 4.38 Ha (existing) to 5.19 Ha (proposed). This is less than the 0.5 Ha identified by the Tyms Report at 0.36 Ha.

Sidmouth

- 6.18 The vision for Sidmouth seeks to accommodate modest employment and limited housing growth to meet locally generated needs. In the Pre-Submission Local Plan there is an initial provision for 3 Ha of employment land through the first phase of development. An additional 2 Ha of development is identified through a second phase of development.
- 6.19 The Tyms study commented that Sidmouth is a constrained town in terms of new employment sites and the existing accommodation is of a poor standard. In relation to the Alexandria Road site the Tyms Study identified only 0.15 Ha of developable land at the site noting its poor quality in both access and prominence. The unsatisfactory access to the site was noted in the Sidmouth Local Plan (1993) and little has changed since this publication. Public investment to improve access is estimated by Devon County Council to be £1 million. Although a viability assessment has not been undertaken the cost of providing improved access and the issue of potential ransom strips at Alexandria Road means there is little chance of delivering an economical viable scheme.
- 6.20 Sidmouth has the second largest population of the towns in East Devon and the third largest economically active population.
- 6.21 The allocation of employment land in Sidmouth reflects the towns position as having one of the larger total and economically active populations. Currently there is no provision in the town to offer expansion and new employment opportunities. The TAFF Report (2007) and Tyms Study identify a very limited amount of available and developable land on existing employment sites. The NPPF highlights the need of the planning system to perform an economic role contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. Existing provision at Alexandria Road has poor access and site accommodation is of a poor standard.
- 6.22 Strategy 26 recognises the Sidford sites position in an Area of Outstanding

Natural Beauty and promotes the sites development in a phased approach which will be subject to the highest design and landscaping standards. With limited capacity within the settlements Built Up Area Boundary for employment development the only locations for employment development is outside the settlement boundary in the AONB.

- 6.23 With respect to Sidmouth and the allocation of land it is specifically noted that the Paragraph 116 to NPPF reads:

“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

- 6.24 With respect to the three bullet points above specific commentary is provided in the paragraphs below:

- 6.25 This evidence paper and further evidence submitted on the plan shows a need for employment development to serve the town. There is very limited exciting development land to serve the town that is readily available for development. However there are houses being built in the town that will accommodate residents and school leavers who may wish to secure jobs in the town. There is, therefore, considered to be the need for new employment land for Sidmouth. Failure to provide for future employment provision for the town, to provide scope to help diversify the local economy, could lead to adverse impacts for Sidmouth.

- 6.26 The key challenge with finding new employment land to serve Sidmouth is that the town is heavily constrained by environmental designations. Whilst the plan does not propose any housing allocations that go outside of current local plan Built-up Area Boundary and into the AONB it was not felt possible to meet employment needs by

not doing so. There is very limited land available to develop or redevelop in the town itself and also the town is heavily constrained by built heritage and environmental assets. An option would be not to provide for employment uses at Sidmouth and accept that people would have to travel outside of the town to access jobs. However doing so could entail travel through the East Devon AONB to arrive at job locations beyond boundaries (for example Exeter or other East Devon towns) and this would, in its own right, have impacts on the AONB through vehicle pressure on roads and emissions.

- 6.27 In constructing policy considerable effort has been applied to establishing the best site for development and ensuring that policy is very restrictive, recognising environmental importance and building in safeguards, to ensure that impacts are minimised and if possible mitigation can be incorporated into development proposals.
- 6.28 The Sidford employment allocation is one of very few areas of land that are specifically allocated in the Local Plan for development. But Sidmouth and Budleigh Salterton are the only East Devon towns with the AONB washing up to (and in Budleigh case over) the towns boundaries. In the exceptional case of Sidmouth an AONB land allocation is warranted.

Employment Site in Villages and Rural Areas

- 6.29 East Devon District Council is keen to promote employment opportunities in rural areas. This is seen as a way to help to maintain and enhance village vitality and meet local needs whilst also providing an alternative to a reliance on commuting out for work purposes. Policies within the Plan promote this idea and allocations for employment in villages will be identified in the Villages DPD.
- 6.30 East Devon has a number of large scale employment areas including Hill Barton and Greendale Barton which are identified for employment allocations. They are recognised in the Tymes Study (Emp001) as established sites with existing infrastructure in place and with sufficient capacity to accommodate further growth. These sites do not have conflicts with surrounding uses as they are in isolated locations and benefit from their proximity to the strategic road network.