

East Devon Local Plan 2020-2040 Consultation Draft Plan

Savills on behalf of FWS Carter & Sons



Introduction

- 1.1 These representations are submitted by Savills on behalf of FWS Carter and Sons. They are one of two sets of representations submitted by Savills and relates specifically to the policies and proposals relevant to the proposed expansion of the Greendale Business Park.
- 1.2 FWS Carter and Sons have owned and operated the thriving Greendale Business Park for many years. During this time it has grown into a significant contributor to the East Devon economy employing circa 1,600 people across a diverse range of employers, from national and international companies and organisations such as FedEx, Viridor and the NHS, to local start-ups including the award winning Powder Keg Brewery.
- 1.3 Despite the challenging economic climate there are no vacancies within the Business Park. On the contrary there is a substantial, up-to-date register of interests from businesses keen to locate to the Business Park. Indeed, as of October 2022 the register of interests comprised a wide range of businesses with a requirement for a total of 392,000 sq.ft. which would require circa 4-5 hectares of employment land. These businesses include:
- Olympus Power – a local renewable energy and solar panel installer;
 - Bar Nova – an events business; and
 - TRS Bespoke Interiors – a bespoke furniture manufacturer.
- 1.4 These and other local SME businesses want to operate from the Greendale Business Park because it offers good quality and affordable accommodation. The rental levels are considerably lower than other employment locations within the authority area and given the current inflationary pressures and consequential economic challenges facing many businesses, affordable accommodation is crucial to their long-term sustainability.
- 1.5 In addition to accommodation, one of the greatest challenges for businesses, particularly SMEs and start-ups, has been the rising cost of energy. Commercial enterprises do not benefit from the

Government energy price cap, and many will see their costs increase two, three or four fold when fixed price energy contracts expire in early 2023. Not only does the Greendale Business Park provide affordable accommodation, but it also benefits from its own direct, locally sourced renewable energy.

- 1.6 FWS Carter and Sons have invested significantly in the on-site anaerobic digestion plant which, for the vast majority of time, supplies 100% of the electricity needs of the Business Park. Energy generated by the on-site anaerobic digestion plant has been estimated to save occupiers approximately 20% in energy costs when compared to electricity sourced from the national grid, which is a substantial cost-saving for SME businesses. In a drive to further enhance its sustainability credentials and contribution towards net zero ambitions, it is also in the process of installing a 10,000 sq.m. photovoltaic array to the rooftops of buildings within the Business Park. Once complete this will generate on average 1 megawatt; sufficient to meet the needs of the expanded Business Park.
- 1.7 This continued success and expression of confidence in the Business Park has been a catalyst for the owners – F W S Carter & Sons Limited – to investigate the potential for further future expansion. However, rather than approaching this in an incremental, *ad hoc* way, the owners have chosen to take stock of the current position and, through a systematic and robust analysis of environmental and landscape considerations, develop a 10-15 year Masterplan and a sustainable vision for the future of the Business Park. The Masterplan has now been completed and a copy submitted in support of the HELAA ‘call for sites’.
- 1.8 The implementation of the Masterplan would deliver a major boost to the East Devon economy:
- creating an estimated 1,368 new permanent jobs;
 - generating circa £90m Gross Value Added, which represents a 3.5% growth on the current GVA in East Devon;
 - delivering an additional £2.3m in business rates, approximately half of which would go to the authority to support local priorities;
 - rebalancing the employment market, diluting the reliance placed upon the service industry and boosting average wages;

- addressing unemployment; and
- reducing out-commuting from the authority to employment in Exeter and elsewhere.

- 1.9 We believe that through the environmental-led masterplanning of the Business Park we have demonstrated how these considerable economic benefits can be delivered in a manner which would not have a detrimental impact on the environment.
- 1.10 The masterplan and long-term vision for the Business Park is not solely concerned with mitigating the impact of expansion; it provides an opportunity to take stock of the existing environment and incorporate measures designed to enhance the Business Park as a whole for the benefit of both the current and potential future tenants. These enhancement measures would achieve a minimum 10% net gain in biodiversity, and deliver substantial areas of woodland planting.
- 1.11 Finally, given the importance placed upon climate change by EDDC and the recognised need to support sustainable development opportunities, it should be noted that at present the entire energy demands of the Business Park are provided from 100% renewable electricity generated on-site. There is potential to increase the electricity drawn from the plant to meet the electricity demands of the expansion area and therefore deliver the increased employment through 100% renewable energy.
- 1.12 For this and other reasons explained throughout these representations, within the previous 'call for sites' submission and during the presentation to member of the Strategic Planning Committee in November 2022, we consider the proposed expansion of the Greendale Business Park represents a highly sustainable and sound means of delivering economic growth and new jobs in East Devon.
- 1.13 We hope that this consultation provides a catalyst for engagement on the opportunity at Greendale and would welcome further dialogue with officers and members on the potential for the site to deliver a significant proportion of the authority's future economic growth needs.

Key Issues and Potential Priorities

Chapter 2 - Vision and objectives

- 2.1 We broadly support the proposed vision and objectives set out in Chapter 2 of the draft Local Plan (DLP). Both make reference to the importance of the economy, with the vision aspiring to a ‘resilient economy’ and Objective 4 supporting ‘jobs in the economy’ alongside job creation opportunities and a resilient economy.
- 2.2 The aspiration that appears in both the vision and objective is ‘resilience’; a very laudable and important objective given the recent experiences of economic hardship during the Covid pandemic. Furthermore, with the majority of commentators predicting that the UK economy will enter a period of recession in 2023, economic resilience will be vital to minimising and mitigating the resultant challenges facing the communities of East Devon during this period.
- 2.3 Whilst it is agreed that ‘resilience’ is therefore important, what does that mean in so far as land use planning is concerned? A crucial component of ‘resilience’ is economic diversity. Creating employment opportunities across a wide range of sectors (not just the high-profile and high-value employment which is anticipated in the Enterprise Area) and adopting a flexible approach to planning for economic growth. Doing so will enable East Devon to expand its economic base by not only attracting new national and regional businesses but creating a positive environment that is conducive to the growth and fostering of small and medium sized enterprises across the full range of the economic spectrum.
- 2.4 We will explain later in these representations why the proposed expansion of the Greendale Business Park would contribute positively to this diversity and hence ‘resilience’ of the East Devon economy, and why a flexible approach to employment growth would enhance the economic base of the authority area to the benefit of this objective.

Economic Vision – Paragraph 3.36

- 2.5 We support the principle of adopting housing and economic growth strategies in tandem which

provide new homes and jobs alongside one another. It is important however that policy does not seek to apply such a principle to a granular level of detail.

- 2.6 Given the dynamic nature of the employment market, there can be no guarantee that residents of a new housing development will be employed locally; distributing small pockets of employment across the authority area could therefore in fact have the unintended consequence of generating a large number of private vehicle trips between the rural parts of East Devon. The alternative, which we consider has greater merit, is to focus the vast majority of employment growth at accessible locations which are sustainably located for all future employees. These locations are also more likely to be the focus for effective infrastructure investment, enhancing their sustainability in the future, and less susceptible, and indeed vulnerable, to cuts in service provision as we have seen in a number of rural areas.
- 2.7 The Economic Vision also expands upon the contribution that economic growth is expected to make towards the transition to a net zero economy. The Greendale Group is wholly supportive of that objective and, for the reasons outlined in more detail in the introduction to these representations, has invested considerably in renewable energy generation at the Business Park. There is a great deal of logic to directing future economic growth within certain sectors towards established employment destinations, particularly those such as the Greendale Business Park which can deliver growth promptly, sustainably and in accordance with the authority's net zero ambitions.

Economic Strategy – Paragraph 3.37

- 2.8 For the reasons explained in response to the Vision and Objectives for the DLP, we support the recognition within the economic strategy of the importance of *“retaining and supporting the existing mix of sectors in East Devon”*.
- 2.9 It is also crucial that the Local Plan successfully achieves criterion (d) under paragraph 3.37 and that it identifies and allocates land which will provide accommodation for the diverse range of employment opportunities. Flexibility in this approach is crucial not just to respond to changing economic circumstances which will inevitably occur during the plan period but also to provide

choice for employers as to where they located within East Devon.

- 2.10 Each business has a unique set of requirements, some of which will likely relate to matters such as the type and size of premises available, location and proximity to an existing or future workforce, the cost of accommodation, the provision of energy etc. The greater the range of options made available through the Local Plan to meet the wide variety of diverse business requirements and how these will change over the plan period, the greater likelihood of achieving the economic growth objectives of the authority.
- 2.11 In practice, to be successful this strategy requires the Local Plan to identify a substantially larger amount of employment land than simple growth forecasts would indicate. The quantum is however very difficult to estimate, and adopting a top down approach which seeks to ‘predict and provide’ for employment land requirements is subject to significant uncertainty. Instead, we recommend that the authority starts from an explicitly pro-growth ‘*bottom up*’ economic strategy which is predicated on land availability alongside a ‘*top down*’ market demand based upon point in time economic growth forecasts.
- 2.12 What does this mean in practice? It means that provided land proposed for economic growth is (a) capable of delivering employment development without resulting in an unacceptable impact upon the environment; and (b) capable of achieving the net zero ambitions of the authority and the BNG policy aspirations, that its allocation for employment development should be approached from a positive starting point. The cumulative supply from all such potential allocations should be totalled and, provided it achieves more than the base level of need for the different types of employment land identified through the EDNA then these should form the allocations for the Local Plan. The assessed level of need should not however be perceived as a ‘cap’ or limitation on the amount of employment land to be allocated for development through the Local Plan.
- 2.13 There is in our view no harm to adopting such a permissive and positive economic strategy and only benefits would be forthcoming. If such an approach resulted in a larger number of employment allocations in the Local Plan than the outcome of the EDNA indicated was

necessary and some of these are not subsequently taken up for employment development during the plan period, then the residual would provide an ongoing stock of employment land for the next Local Plan.

Strategic Policy 4 - Employment Provision and Distribution Strategy (and supporting text)

2.14 This draft policy separates out the two components of the draft policy into the scale of development and its location. We address each of these matters in turn.

Scale of Development

2.15 We have outlined in the response to the Economic Strategy (set out under Paragraph 3.37) why we fundamentally disagree with a strict adherence to the 'predict and provide' model outlined in Strategic Policy 4 and why we have recommended a more explicitly pro-growth strategy designed to work from the bottom up to allocate a wide range of suitable and sustainably located employment land. We consider that such an approach has considerable merit and is better placed to deliver the vision and objectives of the Local Plan in so far as they relate to economic growth.

2.16 We recognise that this is a departure from the more traditional top down, 'predict and provide' model where the scale and type of employment need is estimated based upon forecasts from the likes of Oxford Economics, Cambridge Econometrics and Experian. It is however important to adopt a cautious approach to economic forecasts as these are notoriously volatile. There is often substantial differences between the three main forecasting houses and then again between their low, middle and upper forecasts.

2.17 Planning positively for employment development from the bottom up avoids the risk of the economic growth strategy (and the forecasts used to inform it) itself limiting the potential of the authority area to deliver growth.

Location of Development

2.18 Strategic Policy 4 expresses the broad policy approach to employment development across the

authority area during the plan period.

2.19 The first statement in this section of the policy states that existing employment areas “*will continue to be the primary locations for industrial, warehousing, offices, distribution development*”. We support this broad principle. There is a great deal of logic and sense in focusing future development at locations which have proved to be successful employment destinations in the past. Such locations:

- a. have clearly demonstrated that they are situated in a desirable part of the authority area to attract occupiers and the allocation of further land has a very good potential therefore to come forward for further employment uses;
- b. provide a synergetic environment for businesses; many businesses like to cluster with similar firms or those with which they have a synergetic relationship. Providing additional space at existing employment locations will therefore benefit not only businesses looking for new space but also existing businesses located at the enlarged employment areas;
- c. are controlled by landowners who have delivered the existing employment areas and have therefore demonstrated a desire to provide future employment opportunities. Unlike new locations on the edge of towns and villages which could feasibly be developed for alternative land uses such as residential in the future, many employment locations such as the Greendale Business Park would only come forward for employment. There can therefore be a greater degree of certainty over delivery;
- d. benefit from a range of existing infrastructure and services; the cost of expansion is often lower than delivering a new employment location from scratch, again benefiting the deliverability of economic growth;
- e. have demonstrated their resilience over recent years. We are entering a period of recession and East Devon is likely to face a number of economic challenges over the coming years. Many of the established employment areas, including the Greendale Business Park, have weathered severe economic challenges such as the Covid

pandemic. This resilience is in part down to how the Business Park is operated and managed by the owners. It follows that an expansion of the Business Park would be operated on a similar basis and would be equally resilient to the economic headwinds that we are now facing.

- 2.20 The approach we have outlined in response to the Economic Strategy would be entirely consistent with a policy approach which seeks to maintain the existing employment areas as the primary locations for future growth. Indeed, the logical means of delivering the strategy we advocate would be to review of the existing employment areas around East Devon to establish which have the potential for expansion, and if so the extent of the potential expansion which is achievable having regard to environmental considerations.
- 2.21 The Greendale Business Park is a perfect example of an existing employment area which is in a highly sought-after location and capable of expansion within environmental limits. For the reasons explained elsewhere within these representations, expansion of the Business Park is therefore entirely sound and logical.
- 2.22 The subsequent section of the policy states that *“sufficient additional employment land to meet East Devon’s requirements will be identified”* at three broad locations – the western side of the District, at the towns, and in the Tier 3 & 4 settlements.
- 2.23 In relation to the western side of the District, the policy and the supporting text in paragraph 3.65 indicate that emphasis is to be placed on *“high value uses, including those in transformational sectors”*. Whether this is deliberate or accidental it is important that the wording of this element of the policy is revised to broaden the economic sectors which will be supported in the western end of the District. It is not only the higher value or transformational sectors which benefit from the proximity to Exeter and the strategic road network, indeed, these locational characteristics are important for many sectors of the economy. We therefore recommend changing the wording of this first bullet point to:

“on the western side of the District at the existing and allocated employment areas including, but not exclusively, the high value uses and those in the

transformational sectors within the East Devon Enterprise Zone”.

- 2.24 This revised policy wording would (a) tie the strategy into the first paragraph of the locational strategy of the policy, reinforcing the benefits of directing development towards existing and established employment area; and (b) make it clear that the western end of the District is appropriate for growth across a wider range of sectors and is not the exclusive preserve of the high value / transformational sectors.
- 2.25 There is good reason to strongly encourage a wide range of employment opportunities in locations within the western end of the District such as the Greendale Business Park. As an established location, the Business Park is home to many businesses and provides employment for a substantial number of East Devon residents. Indeed, the Business Park currently accommodates circa 100 businesses which collectively employ approximately 1,600 people within a wide range of managerial, administrative and operational jobs.
- 2.26 Of particular importance, given the context set out above, is that employment within the Business Park has been remarkably resilient during the pandemic. Indeed, not one of the businesses located at Greendale ceased trading on a permanent basis as a consequence of the pandemic. Unlike other prominent sectors of the economy in East Devon, many businesses at the Greendale Business Park have not only survived, but in some cases thrived, during the recent economic challenges.
- 2.27 A supportive planning framework within the new Local Plan which enabled appropriate and controlled growth of the Business Park would likely yield significant results, providing a range of new employment opportunities for the residents of East Devon at a time when the country is entering an uncertain and unknown period of economic recession.
- 2.28 We have more fundamental concerns over the other two aspects of locational strategy for economic development – development at the Tier 1 & 2 towns and the Tier 3 & 4 settlements.
- 2.29 The rationale presented for development at the Tier 1 & 2 towns is that this would “*provide jobs and workspace for new and existing residents, to improve settlement self-containment, and to*

reduce the need to commute to work". Whilst that sounds like a desirable objective in theory, no evidence is provided that the wider distribution of jobs (if deliverable) would in fact achieve that objective. Simply increasing the number of jobs at a settlement does not necessarily mean that more residents of the settlement will work in that employment. There is a risk that such a strategy will in fact be counter-productive, spreading a number of jobs to settlements which then attract employees to travel at great distance often by private car.

- 2.30 Take for example the town of Ottery St Mary. Of the three Lower Level Super Output Areas that cover the town in the 2011 Census there were 1,134 recorded jobs. Only 26.4% of these jobs, a total of 299, were however taken up by residents of the Ottery St Mary, the remainder commute to the town for work. The main point to note is that it is not a shortage of jobs that is impacting upon self-containment but the propensity of residents to live and work in the town. Increasing the number of jobs at the Tier 1 & 2 towns will not necessarily have a marked increase on self-containment and could have the opposite effect resulting in increased in-commuting to the town.
- 2.31 Furthermore, notwithstanding whether it is desirable to distribute employment across the Tier 1 & 2 towns, we have very significant concerns regarding the deliverability of such as strategy. As paragraph 6.6 of the previous Issues & Options (Reg 18) Consultation acknowledged, there has been limited progress on the delivery of the existing allocated employment sites at the main towns since the adoption of the Local Plan in 2016. Given the length of time that has passed since these allocations were made, this suggests that there are significant challenges either with the physical delivery of the sites or there is insufficient market demand.
- 2.32 Before allocating further land at the Tier 1 & 2 towns, we would encourage the authority to continue to work with the owners of the existing allocated sites in order to encourage and support their delivery.
- 2.33 For these reasons we are also concerned that the promotion of small-scale jobs and workspaces at the Tier 3 & 4 settlements could also have a counter-productive impact on self-containment. Furthermore, many of the villages in East Devon have a relatively small population and only a limited level of services and facilities available. A large number are also within the protected

landscape of the AONB, while others are accessible only by minor roads. A strategy which supports a wide dispersal of employment across the authority area would likely therefore meet many deliverability challenges including not only planning and due to environmental constraints but would also face limited market demand.

- 2.34 There may be certain Tier 3 & 4 settlements where opportunities exist that are demonstrably deliverable and, in those instances, there may be merit in small-scale employment allocations. However, at the vast majority of such settlements we considered this is unlikely to be the case.
- 2.35 For the reasons set out above, we object to the emphasis placed on the towns and villages of East Devon in the second and third bullet points of the policy.

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

- 2.36 For the reasons explained in the preceding section of these representations, we do not agree that there is necessarily any merit in a policy which seeks the inclusion of employment land alongside new homes on developments of 100 dwellings or more. To avoid situations where employment would otherwise be directed to unsuitable or unsustainable locations, careful consideration should be given to the specific allocations and these include reference to an element of employment development where that would be appropriate.

- 2.37 The first two sentences of the supporting justification for the policy at Paragraph 3.73 state that:

“We recognise the challenges in delivering employment land in the District but the very real need for such provision. Securing mixed use developments is identified as a very clear way forward to secure provision.”

- 2.38 Notwithstanding the first point above and whether the policy would lead to a suitable and sustainable form and distribution of employment development, we also have concerns over the justification for this policy approach. The markets for housing and employment land are very different, and simply tacking employment development onto housing schemes gives no guarantee that the employment will be delivered. Indeed, it could potentially result in a large

number of small pockets of employment land within the authority area which do not come forward and which are eventually repurposed for housing.

2.39 The ‘*bottom up*’ approach we have advocated earlier in these representations would offer positive, in principle support for all of the suitable and sustainable land which the landowners are promoting for employment purposes. Directing employment development in this manner is in our view far more likely to achieve the ultimate objective of job creation than a policy which engineers employment land into residential schemes in many cases against the wishes of residential developers or landowners.

Strategic Policies 9 – 11 – Employment within and adjacent to the Enterprise Zone and Science Park

2.40 We do not object to this policy approach or the specific wording but wish to comment upon the implications for the economic growth and employment strategy across East Devon.

2.41 The Enterprise Zone has been designated with the express intention of providing accommodation for businesses within the higher value / transformational sectors. Consequently, the buildings and environment created need to reflect the aspirations for the Enterprise Zone and the requirements of future occupiers.

2.42 We recognise that the Enterprise Zone represents a core component of the economic strategy and have no objection therefore to a policy which seeks to secure such development standards within the designated area. It is crucial however that the economic strategy and the local plan through which this is articulated in land-use planning terms has sufficient flexibility to accommodate all of the relevant sectors which together make up the future East Devon economy.

2.43 There are many small and medium-sized enterprises who operate at margins which cannot sustain the rental levels for accommodation within the Enterprise Zone. Whilst not within the high value/transformational sectors, these businesses nevertheless make a valuable contribution to the East Devon economy and to the lives and livelihoods of many of its residents. It is crucial

therefore that the approach to economic development does not unduly favour one sector over another but provides flexibility and opportunity and for all businesses and employees.

Strategic Policy 27 – Climate Emergency

- 2.44 We entirely agree that climate change is one of, if not the biggest threats facing humanity and that East Devon should play its part in tackling the ‘climate emergency’. The challenge for East Devon, which is the same as the challenge for all authority areas across the UK, is balancing the response to the climate emergency with economic growth proposals which continue to meet needs over the long-term. This is not just about viability, although viability is an important consideration, but it also needs to take into account supply chains and the availability of new technologies which will enable the transition to zero carbon development.
- 2.45 The Greendale Business Park is well placed to meet the challenges of climate change. Presently all of the electricity demand from the circa 100 businesses located within the Business Park is provided by renewable energy generated from the on-site anaerobic digestion plant. The plant takes waste product from the dairy farm and combines this with energy crop to feed two electricity turbines, one of which provides a direct supply to the Business Park, whilst the other feeds into the National Grid.
- 2.46 FWS Carter & Sons has aspirations to work with EDDC to change the diet of the anaerobic digestion plant to incorporate food waste collected by the recycling service. This food waste is currently collected from households across the authority area and taken to a central facility on the Greendale Business Park and from there it is transported outside of the authority area. Using the food waste as part of the diet for the anaerobic digestion plant would not only reduce the cost to the Council of disposal out of area but it would eliminate the need for HGV transportation, reducing the associated green house gas emissions. If this change could be realised it will contribute positively to tackling climate change in EDDC.
- 2.47 Not content with just being energy self-sufficient, FWS Carter & Sons are investing a considerable sum of money adding photovoltaics to the roof space available on the larger buildings at the Business Park to generate further green energy. Investigations are also

underway into battery storage and the potential installation of such a facility on the site to better balance power generation with demand.

- 2.48 The owners of the Business Park are therefore well ahead of the curve on the drive towards net zero. As part of the expansion of the Business Park there is potential for further renewable electricity from the on-site anaerobic digestion plant and the roof mounted solar photovoltaics to be directed to the new units.
- 2.49 In so far as the policy is concerned, our clients are entirely supportive of the Council's objective and fully committed to tackling the climate emergency. All operational energy from an expansion to the Greendale Business Park would be compliant with this policy aspiration from first occupation.

Strategic Policy 33 – Heat Networks

- 2.50 The policy requires all proposals above 1,250 homes or 10 ha of commercial floorspace to be accompanied by a heat network. It is not entirely clear why such a strict policy requirement has been proposed and where the evidence base for this exists. The only evidence base we are aware of is the GESP Low Carbon Study which suggests that large-scale developments above the identified threshold should "*investigate the potential to deploy*" a heat network. This degree of flexibility is crucial as not all commercial developments have the same heating requirements. Indeed, whilst a heat network may be justifiable for a collection of heat intensive office or R&D buildings, the same is not true for industrial and logistics premises.
- 2.51 We therefore recommend that two changes are made to the policy. The first clarifies that the commercial floorspace relates to Use Class B1, and the second requires applicants to *investigate the potential for heat networks* for developments in excess of the prescribed threshold as opposed to strictly requiring these.

Policy 52 – Employment Development in the Countryside

- 2.52 We strongly object to the unduly strict and inflexible approach proposed within Policy 52 of the draft local plan. The proposed wording contains so many clauses, caveats and obligations for

prospective applicants that there is little prospect of achieving any economic growth as a consequence.

- 2.53 The policy wording and supporting justification appear to be designed specifically to preclude further intensification of growth at the Greendale and Hill Barton Business Parks on the basis that they are not considered to (a) contribute towards the self-containment of a settlement; and (b) are not deemed to be accessible by modes of transport other than motorised vehicles.
- 2.54 The policy fails to recognise however that there are other positive attributes to these Business Parks, particularly Greendale, which counterbalance these perceived shortcomings.
- 2.55 First, the Greendale Business Park is not an isolated development in the middle of the countryside. Whilst not adjacent to a settlement, the village of Woodbury Salterton is a short walk to the south west and Woodbury is approximately 1.5 miles to the south. The Crealy Theme Park is approximately 1 mile to the west, beyond which is the village of Clyst St Mary which is approximately 2.5 miles from the Business Park. There are therefore a number of existing residents within a relatively short distance from the employment opportunities.
- 2.56 Second, a key arterial route through East Devon – A3052 – is located adjacent to the Business Park to the north. Running along the A3052 are several bus services that provide regular connections through to Exeter, Sidmouth and Honiton. There is also a separate bus service that runs through the centre of the Business Park as part of a loop through from Exeter City Centre.
- 2.57 Third, the location of the Business Park and the accommodation available is evidently extremely attractive to the market. The Business Park currently has no vacancies and a long list of enquiries from interested businesses looking for accommodation. Those enquiries from a range of businesses seeking to locate at Greendale because it fits well with their locational and accommodation requirements. The total list of enquiries equates to approximately between 4-5 hectares. There are evidently reasons why Greendale is a successful and desirable location for businesses despite the availability of land and premises elsewhere within East Devon.
- 2.58 Fourth, as explained above, the Business Park is powered exclusively by renewable energy

generated on site. What it may be perceived to lack in locational sustainability it therefore makes up for in operational sustainability.

2.59 Fifth, as we have explained in the introduction to these representations, the owners of Greendale Business Park have an aspiration to put in place a strategic expansion plan which would extend the area of the Business Park by approximately 22 hectares. Not only would this expansion result in substantial economic growth and job creation, but through a comprehensive approach it would facilitate enhancement of the existing facilities for both the existing and future employees. For example, in parallel with the expansion there could be a contribution towards enhanced and upgraded public transport services to improve bus access to the Business Park. Embracing the opportunity for growth has the potential to enhance the sustainability of the existing.

2.60 Finally, the draft Local Plan proposes a substantial new town on land within the west end of East Devon. One of the options presented in the draft Local Plan includes the Business Park, whilst the preferred option is immediately adjacent, on the north side of the A3052. Whichever option is selected the Greendale Business Park will, in the future, be located in close proximity to a substantially expanded population. It is through this context which the policy context for the intensification and/or expansion of the Business Park needs to be considered.

2.61 In conclusion, we consider the proposed draft policy to be unduly restrictive, unnecessarily limiting the opportunities for growth without due regard to the wider context and sustainability considerations. A substantial reworking of the policy is required to address the shortcomings and we will be happy to work with officers to develop suitable policy wording for the Regulation 19 plan.

Policy 75 – Areas of Outstanding Natural Beauty

2.62 We entirely agree with the context set out at the beginning of Chapter 10. East Devon is blessed with vast areas of outstanding countryside and coastal environments, which are rightly designated and protected through the planning system.

2.63 Whilst we do not believe that these designations should place an absolute moratorium upon

development, they must be afforded a very significant level of protection. As recognised under Option 1, this would indeed increase development pressure elsewhere within East Devon, however, since the areas where the pressure would be increased are the most sustainable within the authority, we do not consider this to be objectionable.

2.64 The expansion proposals for the Greendale Business Park have been prepared with a thorough understanding of the landscape and the potential visibility of development. Detailed landscape and visual impact techniques were employed to assess the theoretical visibility of different parts of the land from key viewpoints in the AONB. This approach led to the definition of development parcels and proposed maximum building heights designed purposefully to ensure there would be no adverse visual impact from the protected landscape.

Policy 87 – Net gains in biodiversity

2.65 The Environment Act 2021 makes it mandatory for all developments to achieve a net gain of 10% in biodiversity. The strong preference is for the biodiversity enhancement to be delivered on-site and therefore as part of the development proposals. It is however recognised that in certain instances this will not be possible and that offsite and/or strategic enhancement schemes will be required to achieve this objective.

2.66 There is an opportunity through the plan-making process to allocate land which it is recognised at the outset can achieve, and in some instances exceed the 20% target. We urge the authority to have regard to the potential for biodiversity enhancement in selecting its preferred sites for meeting future housing and employment needs.

2.67 Insofar as the Greendale Business Park is concerned, there is an opportunity to incorporate a substantial area of new habitat within the masterplan and as part of the expansion proposals the owners are committed to delivering significant biodiversity enhancement. Further details are provided in the appended masterplan document.

Policy 92 – Tree policy

2.68 The objective of this policy is to protect existing trees and enhance tree canopy cover across

East Devon. The proposed expansion of the Business Park is capable of making a significant contribution towards the achievement of this objective through considerable additional tree planting as part of a strategic landscape scheme.

Policy 102 – Historic Environment

- 2.69 The conservation and enhancement of heritage assets is a subject which benefits from its own dedicated section within the NPPF. Section 16 of the NPPF establishes a framework within which identified thresholds of harm are attributed degrees of weight in the decision-making process on planning applications. There is also a separate statutory duty upon local authorities prescribed in Section 66 of the Listed Buildings and Conservation Areas Act 1990.
- 2.70 This well-trodden legal and policy framework has been tested through the courts and is well understood by practitioners. In developing policies related to the Historic Environment, we strongly urge the authority to closely follow this legal and policy framework to (a) ensure that the plan is consistent with national policy and therefore found sound, and (b) avoid any confusion or uncertainty.
- 2.71 A heritage assessment of the land around the Greendale Business Park has been undertaken by Cotswold Archaeology to inform the masterplanning process. This baseline analysis fed into the assessment of the opportunities for expansion. As a consequence there would be no detrimental impact on heritage assets as a consequence of the proposals contained within the masterplan.

Appendix A: Greendale Business Park Strategic Masterplan (December 2020)

Greendale
BUSINESS PARK

GREENDALE BUSINESS PARK

Strategic Masterplan / December 2020



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Issue	Date	Status	Description	By	Checked	Approved
P07	07/01/2021	S3		DT	JF	JF

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Green Ecology



EXECUTIVE SUMMARY

The Greendale Business Park is home to a large number and range of businesses, providing employment for at least 1,600 people. Through incremental growth over a number of years it has become a major contributor to the East Devon economy and a significant source of Business Rates income for the Council.

Even during the difficult economic climate resulting from the COVID-19 pandemic the Business Park has continued to enjoy 100% occupancy (with the exception of one recent re-letting) and demand for expansion space from existing tenants. There remains a waiting list for space, particularly for compound areas and small to medium size buildings, as well as some larger warehouses.

This continued success and expression of confidence in the Business Park has been a catalyst for the owners – F W S Carter & Sons Limited - to investigate the potential for further future expansion. However, rather than approaching this in an incremental, ad hoc way, the owners have chosen to take stock of the current position and, through a systematic and robust analysis of environmental and landscape considerations in particular, develop a 10-15 year Masterplan and a sustainable vision for the future of the Business Park.

The following sections of this document explain the process which has been followed in developing this Masterplan and how the key sensitivities have been recognised, whilst providing a gross expansion area of approximately 20.5 hectares.

Landscape impact has of course been a particular focus of the assessment and Masterplanning process. Using topographical information in a model which tests the theoretical visibility of the land from key viewpoints, the proposals have been designed to avoid the more sensitive and visible areas, focusing development instead where it can be accommodated in the landform. This process has also helped determine where additional landscaping can be introduced to reduce or eliminate visibility of the Business Park from wider views.

There is also a comprehensive package of environmental improvements proposed, with the creation of new recreation routes and links to the wider

footpath network, the planting of trees and delivering of net biodiversity gain well in excess of the targets set by Government. The majority of these enhancements have also been designed to reflect the recent Clyst Valley Regional Park Masterplan proposals, which seek to preserve the riparian wildlife corridors along the Grindle Brook, to enhance the flood protection around this important catchment and to improve its water quality. F W S Carter & Sons Limited fully support the objectives set out in the draft proposals and this is reflected in our new vision for expansion.

The landscape and environmental analysis has also been combined with an assessment of heritage assets, flood risk, drainage and highways, to form a clear understanding of the site and its surroundings. A comprehensive package of proposals has been made as a result, including highways improvements around the intersection between the private access roads and public highway network and a series of attenuation ponds to deal with surface water discharges.

The final two sections of the document outline the ambitions of the landowners to continue to deliver the vast majority of the energy needs of the expanded Business Park through on-site renewable energy generation and the substantial economic benefits resulting from the proposed expansion of the Business Park, including the creation of approximately 1,368 new jobs, adding an estimated £90M to GVA and contributing around £2.3M per annum to the Council through additional Business Rates revenue.

It is by no means envisaged that the development proposals in the Masterplan would be delivered all at the same time. This is a long term plan and the main purpose of this document is to demonstrate how the proposed expansion of the Business Park could fit into East Devon's wider strategy for economic growth, whilst also preserving and enhancing the biodiversity surrounding the Grindle Brook and mitigating any potential landscape impact from key surrounding areas.



INTRODUCTION

Greendale Business Park is a strategically important employment site within East Devon. It is home to a range of businesses, from small-scale operators to large national firms such as FedEx, Royal Mail, DHL and Kier Construction. Across the circa 27 hectare site there are at least 1,600 employees with the combined business' contributing a seven figure sum directly to East Devon District Council through Business Rates. In all respects it is a major contributor to the economy of East Devon.

The Business Park has grown organically for over a decade. There has been no over-arching masterplan or vision for its long-term future until now, which carefully considers all of the potential opportunities and constraints of any proposed development and provides mitigation measures to account for any potential constraints. Therefore, it is quite understandable that local residents may have become concerned about the impact of individual applications, when there has been less of a clear understanding of the overall vision for the future of the Business Park.

This landscape and environmental led Masterplan has been produced in order to address these concerns and to put in place a long-term strategy for future growth. The starting point has been a detailed understanding of the landscape and potential visual impact of development. This evidence base has been used to establish where there are opportunities for the phased expansion of employment uses and the potential form of that expansion. In that way the uses and their potential impacts reflect the landscape sensitivity and have been phased in accordance with the effects of the landscape mitigation.

High level technical assessment has been provided for each of the potential expansion areas to show how these could be developed. This includes the strategic landscaping, ecological enhancement proposals, indicative access arrangements and the likely drainage requirements. These are only indicative but provide a helpful understanding of the way in which each phase could be delivered.

Another major focus of the Masterplan is the enhancement of the existing Business Park. As it has grown, increasing numbers of employers and employees have move to the Park but the central facilities for businesses and communal facilities for employees have not kept pace with the expansion. The Masterplan seeks to address this both retrospectively and with a view to the future expansion. It also reviews the condition of the Business Park and proposes environmental enhancements which could be undertaken on a phased basis to improve the conditions for employees working within the Park.

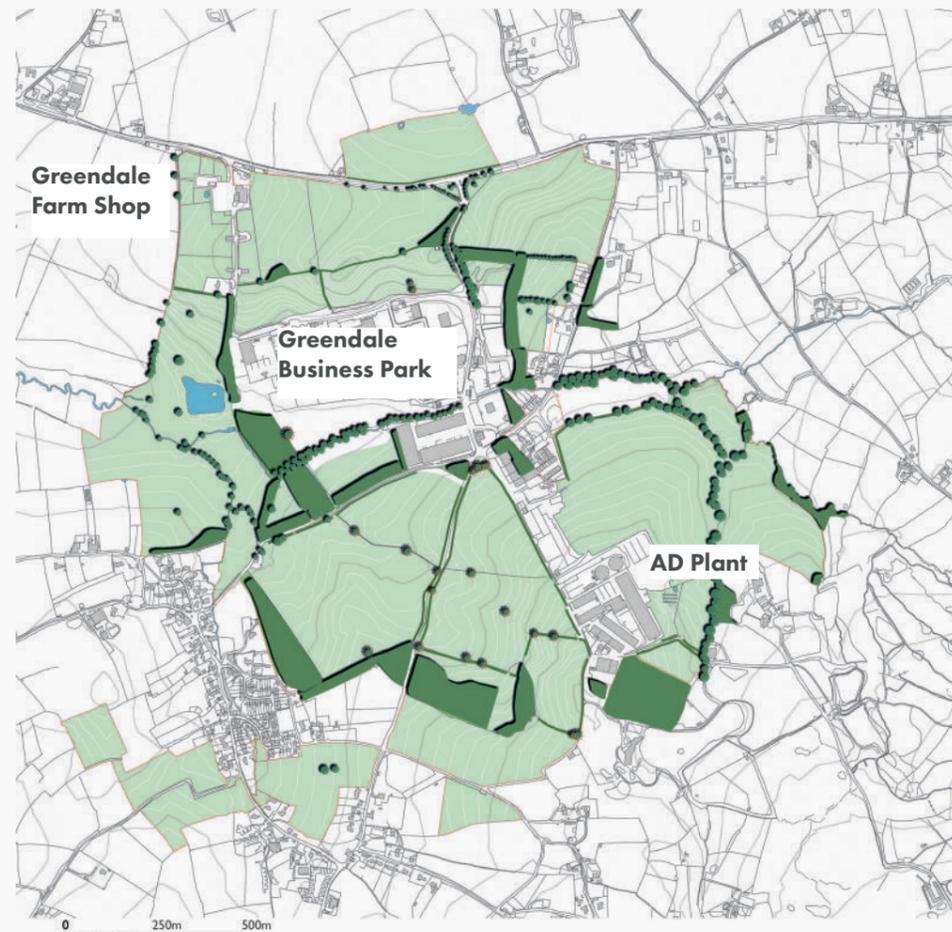


LOCATION

Greendale Business Park enjoys a strategic location, just 3.5 miles from junction 30 of the M5 motorway on the A3052 Exeter to Sidmouth road. The A30 dual carriageway is 5 miles to the north-west of the Park, and Exeter International Airport is 3.5 miles to the north. Exeter city centre lies 7 miles to the west.

Location	Approximate Travel time from Greendale Business Park by car
M5 Jct 30	8 Minutes
Exeter Airport	8 Minutes
Exmouth	17 minutes
Sidmouth	20 Minutes
Honiton	20 Minutes
Exeter	21 Minutes

Although the Business Park is conveniently sited for access to the busy hub of Exeter, its more rural setting, away from the city's busier roads and the natural topography of the surrounding hillside result in a unique setting for a Business Park. Sunken into the landscape, the park is surrounded by the East Devon Countryside.

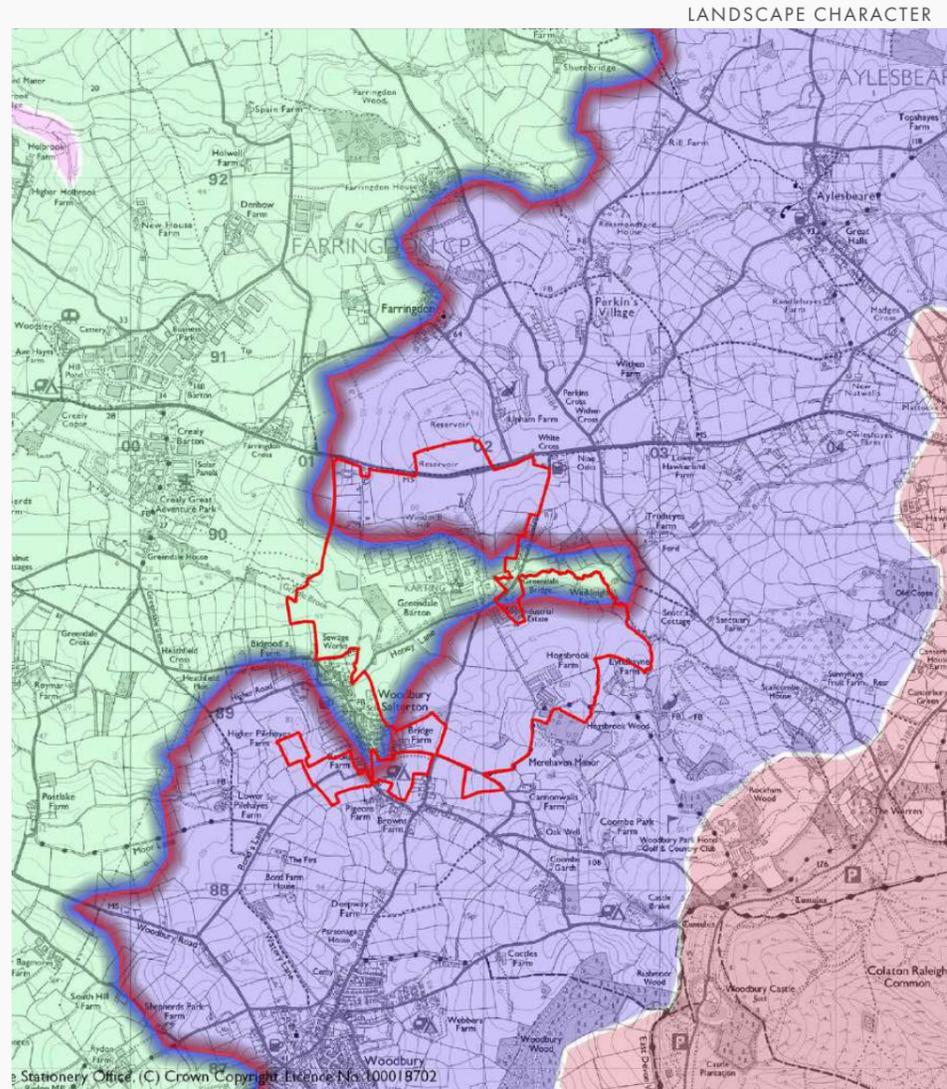


SITE LOCATION



SITE LOCATION IN CONTEXT OF SOUTH DEVON

- Key**
- Site location
 - Devon Landscape Character Areas**
 - Clyst Lowland Farmlands
 - Exe Estuary and Farmlands
 - Pebble Bed Heaths and Farmland
 - East Devon Landscape Character Types**
 - Estuaries
 - Lower rolling farmed and settled valley slopes
 - Lowland plains
 - Main cities and towns
 - Marine levels and coastal plains
 - Pebbled heaths
 - Sparsely settled farmed valley floors



BASELINE CONDITIONS

3.1 Landscape and Visual Appraisal

To establish the environmental and landscape baseline a detailed understanding of the landscape and potential visual impact of development was required.

A preliminary Landscape and Visual Appraisal (LVA) was undertaken by Nicholas Pearson Associates to provide a baseline and strategic overview of existing landscape character and visibility of the Site from the surrounding area.

The preliminary LVA was undertaken in accordance with guidance provided in the Institute of Environmental Management and Assessment and Landscape Institute (LI/IEMA) document, 'Guidelines for Landscape and Visual Impact Assessment' (LI/IEMA, 3rd edition 2013).

The Site is strongly influenced by topography, situated within a valley containing the Grindle Brook, with land sloping steeply to the north to Windmill Hill, and to the south-east to locally elevated land in the vicinity of Hogsbrook Farm.

Within the Site boundary there is a Listed Building – Greendale Barton (Grade II). There are no other landscape or heritage designations within the Site itself.

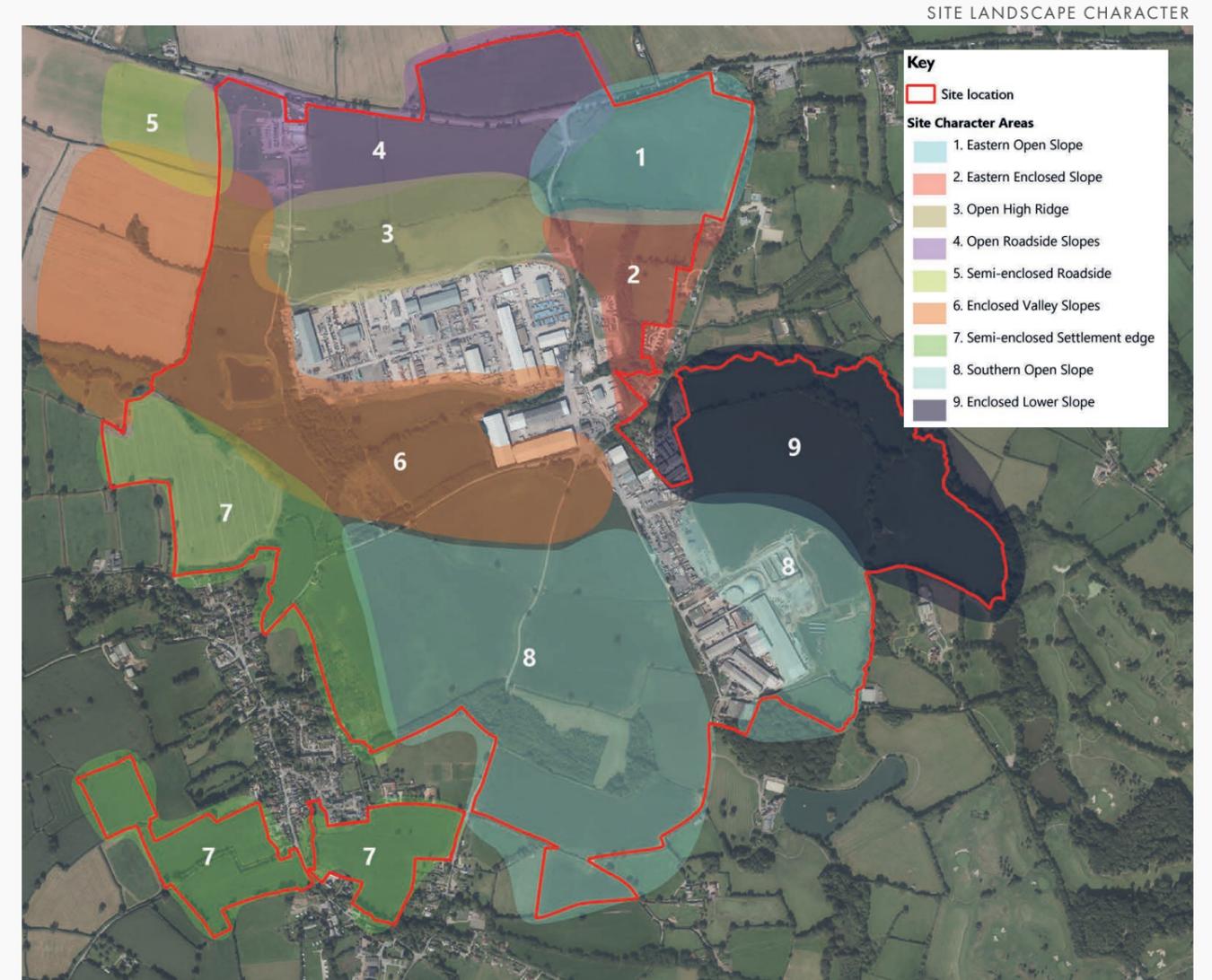
The East Devon Area of Outstanding Natural Beauty (AONB) is located approximately 1km to the south-east of the Site, at the nearest point.

The site sits across the boundary of two Devon Landscape Character Areas (LCA). Broadly, the western and central parts of

the Site fall within the Clyst Lowland Farmlands LCA.

The northern and south-eastern parts of the site, which are more elevated, fall within the Pebble Bed Heaths and Farmland LCA. The sensitivity of these two LCAs to development within the Site are judged to be low-medium and medium-high, respectively.

Nine different Site Character Areas (SCA) have been identified through this study. The overall sensitivity of each of these areas has been determined: one SCA is of low sensitivity (Area 5 outside the site), three SCA are of medium sensitivity (Areas 4, 6 and 8), four SCA are of medium-high (Areas 1, 2, 7 and 9) sensitivity and one is of high sensitivity (Area 3).

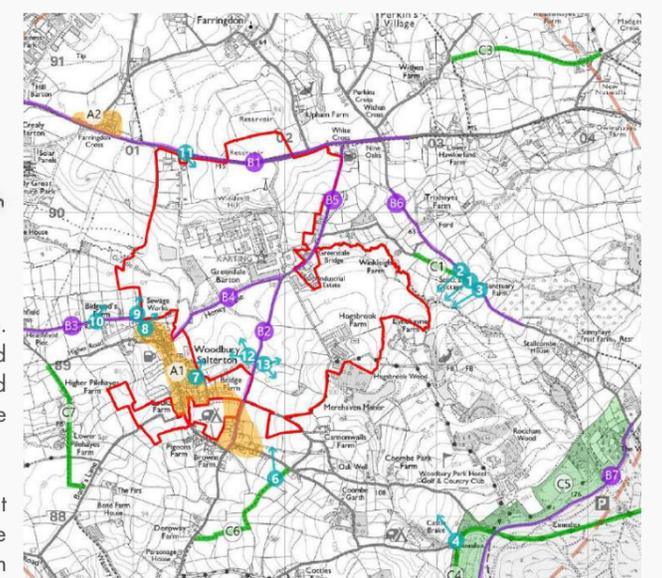


Visibility of the Site from the surrounding area is generally limited due to topography and intervening hedgerows, tree belts and woodlands.

The study has identified visual receptors who have potential to experience visual effects due to development of the Site, and considered their sensitivity to change. These include residents within the village of Woodbury Salterton and users of local roads and public rights of way, including some located within the north-western edge of the East Devon AONB and along the East Devon Way long distance path.

Landscape opportunities and constraints on any development have been identified at a strategic level, as key initial points to be considered in planning the future of the business park, and to assist in the development of a landscape-led masterplan.

- Key**
- Site location
 - A1 Local residents
 - B2 Local road users
 - C5 Users of public rights of way and open access land
 - 1 Representative viewpoint location



VISUAL RECEPTOR GROUPS AND RESPECTIVE VIEWPOINT LOCATIONS



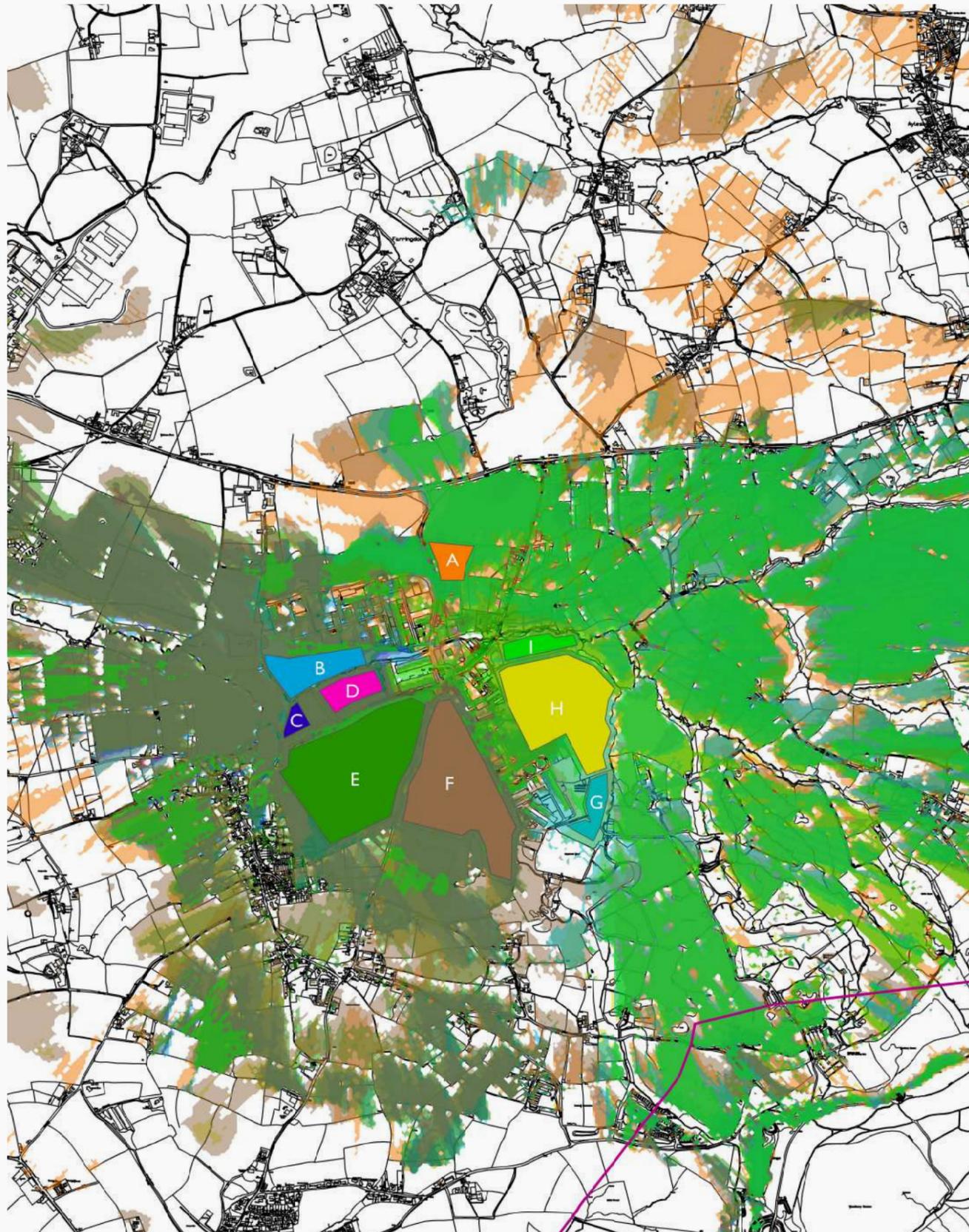
VIEWPOINT 10: View for Lower Road, looking North to North East towards Greendale Business Park



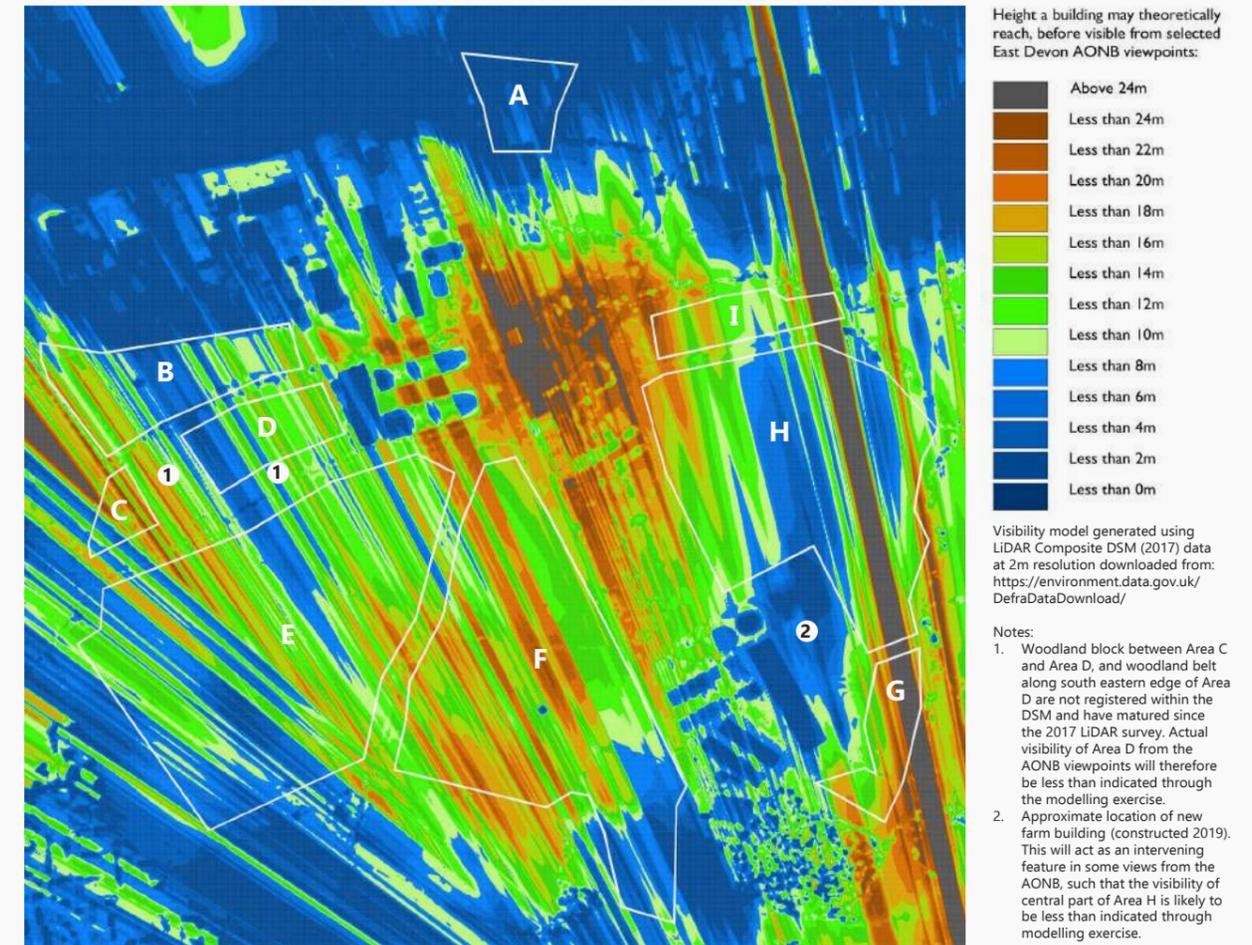
VIEWPOINT 5: Woodbury Common at Western edge of Woodbury Castle car park, looking North



VIEWPOINT 7: Stony Lane adjacent to Woodbury Salterton allotments, looking North-East



ZONES OF THEORETICAL VISIBILITY USING DSM - ALL AREAS OVERLAID. 10M HEIGHT



VISUAL CONSTRAINTS TESTING FROM AONB VIEWPOINTS

3.2 Landscape Capacity Study

This Landscape Capacity Study considers the extent to which different areas of the site may be able to accommodate new development whilst considering the potential for adverse landscape and visual effects.

Nine land areas were identified for consideration. The landscape and visual opportunities and constraints for each of these areas has been appraised.

Key viewpoints were identified during the field survey, from which there is some visibility of parts of the site. These included viewpoints located within the north-western edge of the East Devon AONB. Due to the potential high sensitivity of visual receptors in this location, a further visibility testing exercise was run, using the visual analysis software.

The output is a constraints plan, showing the height to which new development could potentially reach within each area of the site, before it is theoretically visible from any of the AONB viewpoints,

An indication of the landscape capacity of each area is provided through the 'risk of adverse landscape and visual effects' rating. This considers the degree to which development, in particular industrial-type development, within each area, is likely to trigger adverse landscape or visual effects.

Two areas (Areas B and D) are rated as having an overall low-medium risk of adverse landscape and visual effects. This is due to their proximity to the existing business park, being smaller scale parcels, which occupying lower elevations and are generally more enclosed by boundary

vegetation; Four areas (Areas E, F, H and I) are rated as having an overall medium risk of adverse landscape and visual effects. In general, these are the larger land parcels, which are less enclosed by topography and / or boundary vegetation. Advanced woodland planting would assist in increasing future capacity of these areas.

Three areas (Areas A, C and G) are rated as having an overall medium-high risk of adverse landscape and visual effects. These areas are generally more elevated, or more visually separate from the existing business park, such that development may be less readily integrated into the landscape.

3.3 Ecological Baseline

This section was informed by a detailed desk-based study and Phase 1 Habitat Survey and seeks to identify where the presence of ecological features will be a material consideration for the LPA when considering future development proposals.

The study area comprises mainly agricultural (arable) land, with fields bound by Devon hedges, mature trees and plantation woodlands. The wooded Grindle Brook passes through the centre of the study area in an east to west direction.

The site is not subject to any nature conservation designations, but is within the 'Zone of Influence' of East Devon Pebblebed Heaths Special Protection Area (SPA), Special Areas of Conservation (SAC) and Site of Special Scientific Interest (SSSI) and the Exe Estuary SPA and Ramsar site. The site also lies within a consultation zone for the European Protected Species great crested newt.

The network of hedgerows and woodlands in particular have potential to support a range of protected and notable species. Detailed ecological surveys would be carried out in line with best practice guidance prior to developing detailed designs for a planning application and comprise:

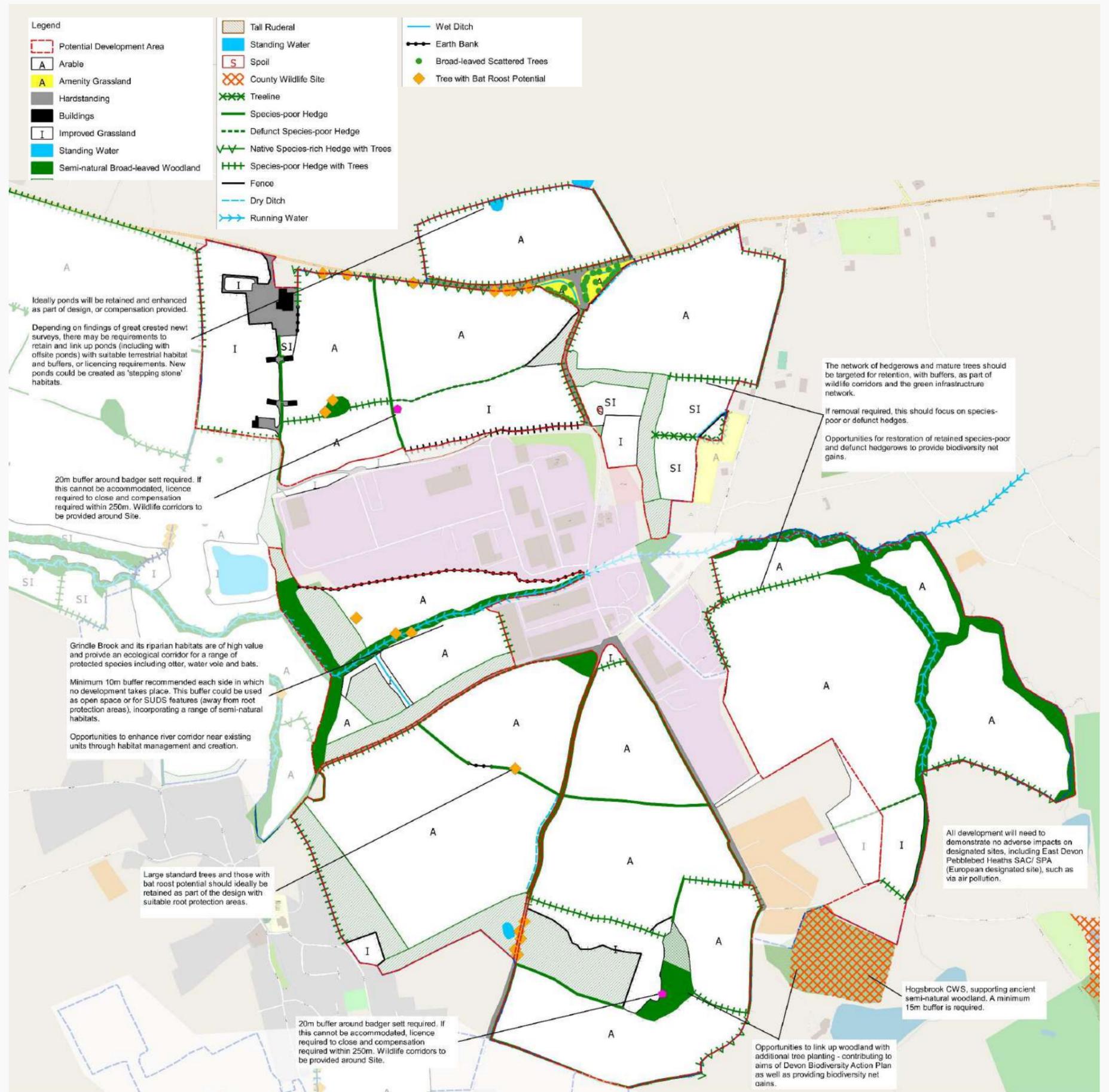
- Bat activity, including checks of tree for roosting potential
- Riparian mammals (otter and water vole)

- Breeding birds
- Dormouse
- Great crested newt
- Badger

Figure 1 shows the survey area and habitat types and identifies initial constraints as well as opportunities to avoid, mitigate and enhance key ecological features.

The overarching ecological objectives for the design will be to:

- Conserve biodiversity in accordance with the mitigation hierarchy (avoid, mitigate, and as a last resort compensate)
- Demonstrate at least 10% net gain for biodiversity through restoration of existing ecological features and creation of new habitats in locations that contribute to enhancing ecological networks
- Retain and buffer hedgerows, trees, ponds and the Grindle Brook, and maintain dark corridors for nocturnal wildlife
- Provide mitigation for potential impacts to nearby designated sites
- Provide a long-term strategy for the sensitive management of habitats and species.



ECOLOGICAL CONSTRAINTS AND OPPORTUNITIES PLAN

3.4 Transport and Access

Greendale Business Park is well connected in terms of public transport, with a local bus linking Exeter to Exmouth, via Woodbury Salterton running through the site and a high quality regional service, the 'Jurassic Coaster' running along the A3052, just a short walk away.

The Business Park is also very well placed for access to existing retail and leisure facilities located on the A3052 corridor. There is currently less in way of formal provision for pedestrian and cycle access to the site, however there are a number of existing internal routes including a pedestrian/cycle link with the nearby farm shop.

Primary vehicular access to the existing Business Park is via a private spine road through the site, which forms a ghost island priority junction with the A3052 at its northern end. At its southern end, the spine road intersects the White Cross Road and Honey Lane, at an informal priority arrangement. The private road then continues to the south, providing access to the units currently comprising Higher Greendale.

White Cross Road separates Greendale Business Park and Higher Greendale, linking the White Cross priority junction with the A3052 with the village of Woodbury Salterton to the south. As White Cross Road is a public highway, this forms the priority movement at the Greendale crossroads junction, despite being a country lane and carrying a relatively light traffic flow.

Around 60 meters to the west of the crossroads junction, there is an additional priority junction with a private side road emerging from Greendale Business Park, however this restricted to outbound movements associated with Greendale Office only.

Almost immediately to the south of the crossroads junction, White Cross Road forms a priority junction with Honey Lane which is a further stretch of public highway providing an alternate route to the northern part of Woodbury Salterton to the west.



3.5 Flood Risk and Surface Water Drainage

Environment Agency (EA) mapping indicates the majority of the site lies within Flood Zone (FZ) 1 (the Zone with the lowest flood risk). However, some areas associated with the Grindle Brook and minor watercourses/ditches are located within FZ 2 and FZ3. These FZs do not take account of the impacts of climate change.

The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) "Flood Risk and Coastal Change" state that the proposed commercial/industrial development is classified as "Less Vulnerable" and therefore is permitted within FZs 1, 2 and 3a (FZ 3 is further broken down into FZs 3a and 3b, whereby 3b is the "Functional Floodplain"). Any development within FZs 2 and 3a will require flood volume compensation where floodplain storage is lost.

EA mapping indicates that the risk of surface water flooding across the site ranges from "Very Low" to "High", but these areas of higher flood risk generally correspond with the FZs.

Lower lying areas of the site are shown by EA mapping to be at risk of flooding from a reservoir breach, associated with a reservoir located south-east of Hogsbrook Wood. These flood

risk extents closely match the FZs associated with the Grindle Brook. No other sources of flood risk e.g. groundwater, sewers etc. have been identified on site.

Surface water drainage must not increase flood risk on site and downstream. The potential to increase flood risk is generated by the replacement of natural ground with impermeable surfaces. The loss of natural surfaces also removes the processes which removes pollutants from rainfall, which will impact the Grindle Brook catchment as assessed under the Water Framework Directive (WFD). This catchment which was recorded as "Poor" in 2019.

To meet requirements of the NPPF, Devon County Council's Lead Local Flood Authority (LLFA) recommend the use of Sustainable Drainage Systems (SuDS). SuDS aim to mimic natural drainage processes of a site prior to development.

Initially, the means of discharging surface water should be determined based on the drainage hierarchy given in the NPPF PPG, Building Regulations Part H and CIRIA C753 "The SuDS Manual". Based on the underlying geology, topography and existing drainage on site, surface water runoff will be discharged into existing surface water bodies on site (e.g. the Grindle Brook and minor watercourses/ditches).



3. BASELINE CONDITIONS

3.6 Opportunities and Constraints

As highlighted in the adjacent plan there are a number of conditions across the site which will require consideration when developing the strategic masterplan. In summary:

1. Site Visibility

Referring to the plan opposite, the areas coloured blue are generally considered more sensitive from a landscape visual perspective and could only accommodate development of less than 8m before such development would become visible from the key viewpoints assessed (e.g. the AONB to the East).

The areas coloured green on the plan are considered to be the less visually sensitive, with the potential to accommodate development of more than 10m+ before such development would become visible from key viewpoints.

However, it should be noted the data used to carry out this visual assessment did not account for the location of a new farm building to the South and Area H, which acts as an intervening feature in some views from the AONB, such that Area H would be less visible than indicated. Furthermore, the established woodland to the South of Area D has matured since the 2017 LiDAR survey and its actual visibility from the AONB is therefore less than indicated through the modeling exercise.

Therefore, the plan illustrates that the majority of the areas identified could accommodate development of more than 10m+ before becoming visible, with the exception of certain key areas. The options for these specific areas has been adjusted to reflect this, as you will see in the following sections.

2. Landscape

There is the opportunity for the retention and enhancement of the existing landscape structure through the planting of new trees, hedgerows and woodland areas, and connecting these areas to create a green infrastructure network. Such a network will help to improve the overall landscape structure and assist in visual integration of any new development.

3. Site Ecology

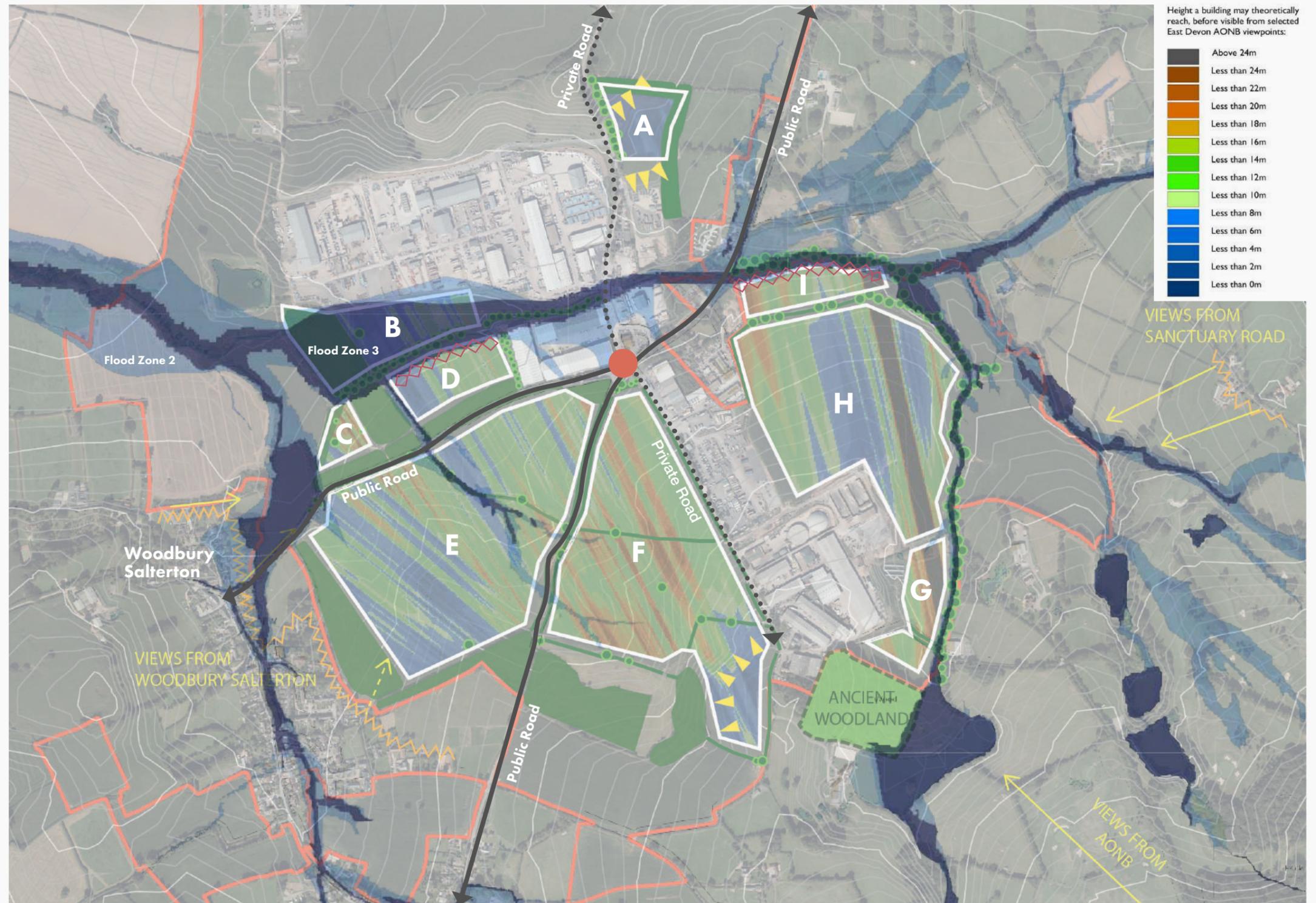
Where Areas D, I and H border the Grindle Brook a 10m offset for any future development is advised. Large extent of mature hedge have been identified and should be considered within developing access to the parcels. The green infrastructure network may also accommodate elements of sustainable drainage systems and provide opportunity for biodiversity enhancement.

4. Flood Risk and Surface Water Drainage

The majority of Area B sits within Flood ones 2 and 3 with Areas D and I partially with in Flood Zone, 2 and 3. Extent of non permeable area to be considered in any future development

5. Transport and Access

The improvement of the existing junction (highlighted in red) should be considered for any future expansion to the business park that would increase traffic in this area.



OPPORTUNITIES AND CONSTRAINTS PLAN



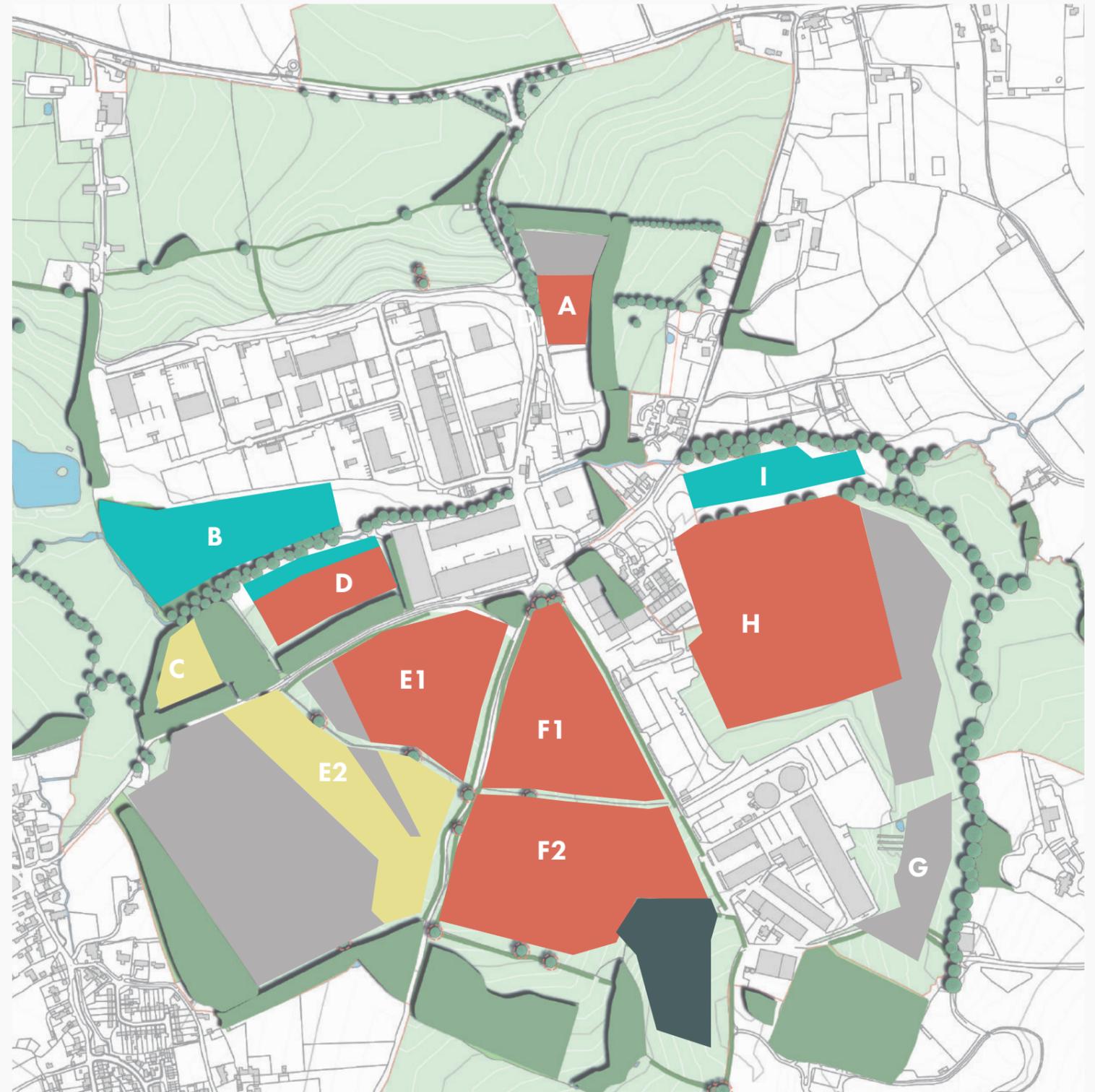
MASTERPLAN DEVELOPMENT

4.1 Selection of suitable Areas for future development

Following the outcomes of the Site Capacity Study and the various site opportunities and constraints highlighted in the previous section, the Areas suitable for future development can be identified.

The below table provides a summary of the reasoning behind both selecting and discounting parcels for inclusion in the strategic masterplan.

Land Area	Reasoning for Selection
A	Parcel A holds a key strategic position within the Business Park due to its views South over the site and being located next to the primary access road it has the potential gateway to the Business Park. A north section of the Area has been discounted for development due to the sloping site, however will be an opportunity for providing landscape and biodiversity enhancements and a low level building.
B	As Area B falls within designated flood zones 2 and 3 it has been deemed to be unsuitable for future development. The location does however provide the opportunity to expand wet meadow habitat and enhance character of the tree-lined stream, in accordance with landscape character guidance, and objectives of the 'Grindle Brook' (GB) project within the Clyst Valley Regional Park Masterplan.
C	Due to Area C's proximity to Woodbury Salterton and challenges with obtaining access to the site via Honey Lane it has been discounted as suitable for future development.
D	Due to the adjacent flood zones and the its proximity to the Grindle Brook the extent of Area D has to be reduced by setting back its Northern boundary. The maturing tree line to the South of Area D provides screening to any future development. Consideration to access will be required due to the limitation of access via Honey Lane.
E	The area to the North of Area E is well suited to future development due to its adjacency to the existing Business Park and low levels of visibility. To the South there are large areas that are to be discounted due to their high visibility from the AONB. The area identified in yellow is also discounted due to its proximity to Woodbury Salterton.
F	The majority of Area F is viewed as suitable for future development, however, the Southern portion has been discounted due to the steeper topography. An existing hedge row runs through the central portion of F which will need to be considered in future proposals.
G	Parcel G has been discounted due to high levels of visibility from the AONB.
H	The majority of Area H is viewed as suitable for future development. An area to the East has been discounted due to its visibility from the AONB, however, will be an opportunity for providing landscape and biodiversity enhancements.
I	Parcel I has been discounted as it is viewed that this area should be prioritised for future landscape and ecological enhancements given its proximity to the Grindle Brook. Its location in relation to Area H means the Area I could provide an area for surface water attenuation for H.



AREAS SUITABLE FOR FUTURE DEVELOPMENT

- Area suitable for future development (limited visibility from AONB).
- Area not suitable for future development (visible from AONB).
- Area not suitable for future development due to proximity to Woodbury Salterton.
- Area not suitable to future development due to proximity to Flood Zone's 2 and 3.
- Area not suitable for future development due to topography.



PROPOSED DRAINAGE PLAN

4.2 Proposed Drainage Strategy

The Masterplan for the site has been developed following “the sequential approach”, avoiding identified flood risk areas. In addition, a SuDS-led surface water drainage strategy will be developed for the site. SuDS will manage surface water runoff to prevent increased flood risk on site and downstream. To achieve this, discharge rates and volumes from the development will not exceed the predevelopment greenfield conditions.

SuDS can also have a wide range of benefits, such as: improving water quality discharged from site, improving amenity spaces and placemaking, enhancing biodiversity (potentially contributing to Biodiversity Net Gain), and contributing to reduce carbon footprint (through reduced embodied carbon in materials used and carbon sequestration where SuDS are vegetated).

For an effective SuDS network, a “management train” should be developed

to mimic natural processes. The management train should form a holistic part of the development proposals. A SuDS Management Train consist of the following elements;

- i. Source Control
- ii. Conveyance
- iii. Site Control

Source Control refers to SuDS that manage rainfall at source, replicating the properties of natural surfaces, making them effective for managing water quantity and water quality. Examples include: permeable paving systems and bioretention (also referred to as rain gardens and includes tree pits). Vegetated bioretention systems provide opportunities for amenity and biodiversity enhancement. Where permeable paving is utilised, it is likely that a macro-pervious structure will be more appropriate given the likelihood for high-traffic loading in an industrial setting.

Conveyance features e.g. swales, ditches and rills, move runoff from one place to another. These measures, being open and often vegetated, will inherently provide more water quality treatment compared to a conventional piped system and can provide an attractive feature alongside cycle/footways and roads or on development plot peripheries.

Site control features provide the strategic-level control for meeting the flood risk objectives for a site by temporarily storing runoff, managing the higher runoff rate from the urbanised site and controlling the outflow to match undeveloped rates. The attached plan indicates initial locations and sizes for site control features which could consist of detention basins (i.e. a dry pond) or ponds/wetlands. It is recommended that ponds/wetlands are utilised nearer the Grindle Brook so that these can compliment, and possibly enhance, the water meadow habitat, contributing to ecological and WFD aims.

4. MASTERPLAN DEVELOPMENT

4.3 Proposed Access Strategy

In addition to the provision of footways on all new internal roads to facilitate travel by foot across the site, a network of off-road pedestrian/cycle links is also proposed to be provided across the site, including a link to Woodbury Salterton as well a public transport enhancements. These will ensure the site is highly permeable to non-car users and encourage movement into and around the site by these sustainable modes, as well as providing benefit to the community of Woodbury Salterton by formalising existing desire line between the village and the farm shop.

The key aspect of the vehicular access strategy for Higher Greendale involves

the provision of a roundabout to replace the existing crossroads junction. This roundabout would seek to better manage the interaction between public and private highway and would provide a focal point at the heart of Greendale which will play an important place-making role in developing the masterplan.

A further change to the existing highway layout would comprise the stopping-up of the additional private access from the Business Park to the east of the crossroads junction and the diversion of the northern most section of Honey Lane is diverted to meet White Cross Road approximately 120 meters to the south at a new and upgraded priority junction. Together, these highway

improvements will reduce the potential for vehicle conflict by simplifying the existing arrangements and ameliorating deficiencies within the existing highway layout.

To the south of roundabout, it is proposed that the existing private spine road through Higher Greendale is retained and upgraded to form the main access route into the various parcels of development. This route can be readily upgraded to accommodate additional HGV traffic and would minimise the impact on the existing areas of ecological sensitivity such as the hedgerows on White Cross Road.



PROPOSED ACCESS PLAN

-  Existing public road running through Site
-  Existing Private Road Running through Site
-  Proposed Vehicle Connection
-  Section to be closed and diverted
-  Proposed Realignment of Honey Lane
-  Upgraded Private Road
-  Proposed revised bus route
-  Proposed pedestrian and cycle
-  Proposed new roundabout

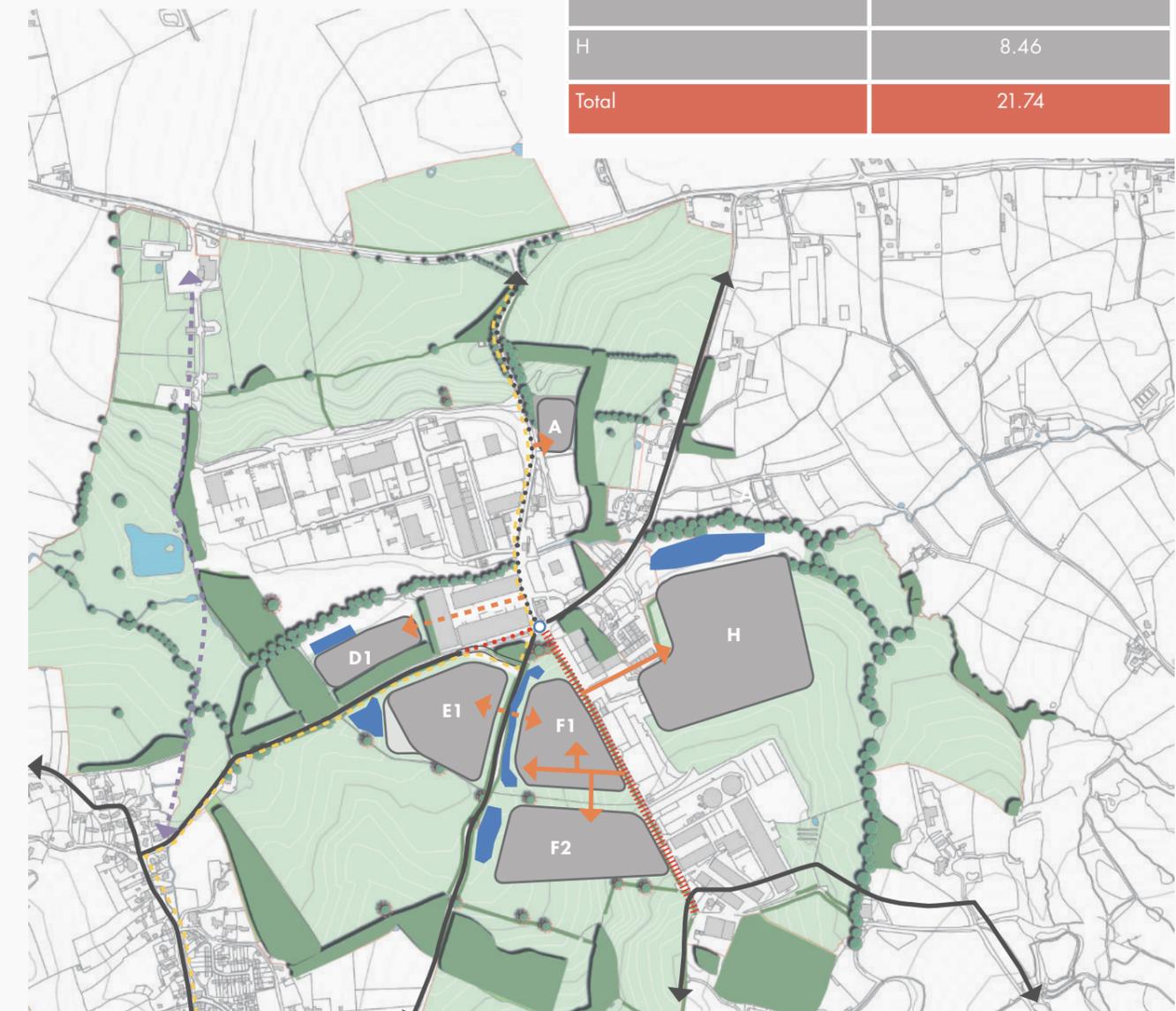
GREENDALE STRATEGIC MASTERPLAN

4.4 Proposed Parcel Plan

The below plan defines the land parcels that have been identified as suitable for future development. The parcels have been located as a result of the extensive view analysis, consideration of ecological constraints, provision of access to the parcels and quantum of site attenuation required. This diagram will form the basis for the environmental and landscape enhancement proposals for the site.

The adjacent table provides an approximate are for each parcel.

Land Parcels	Approximate Areas (Ha)
A	0.74
D	1.09
E1 (Including compound Area)	3.88
F1	3.28
F2	4.29
H	8.46
Total	21.74



PROPOSED PARCEL PLAN

-  Parcels to be developed (Suitable for built form)
-  Compound area (not suitable for built form)

LANDSCAPE AND ENVIRONMENTAL ENHANCEMENTS

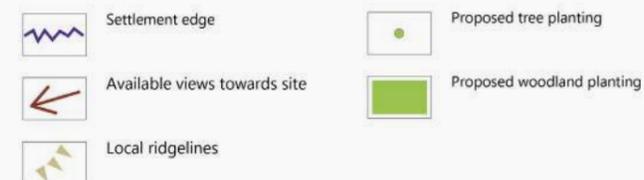
5.1 Visual Mitigation Strategy

The locations for the proposed development parcels has been informed by the visual analysis. The following elements also form part of the strategy to reduce and mitigate visual effects (note, location of numbers are identified in the below plan):

1. Additional tree planting within hedgerows, including broad-leaf species, to assist in visual integration of the new development.
2. Orchard / woodland planting to provide additional visual mitigation.
3. Retain existing woodland around development parcel. Building will likely be seen in some local views, sensitive design approach required.
4. Proposed woodland buffer to provide further screening from Woodbury Salterton and Honey Cottage.
5. Tree belts and new hedgerow to screen Parcel H from the southeast.



PROPOSED LANDSCAPE AND ENVIRONMENTS ENHANCEMENTS PLAN





PROPOSED LANDSCAPE CHARACTER ENHANCEMENTS PLAN



PROPOSED RECREATIONAL STRATEGY PLAN



5.2 Landscape Character Enhancement Strategy

The strategy to enhance the landscape character of the site, includes (note, location of numbers are identified in the above plan):

- 6. Additional tree planting within hedgerows, including oaks, to enhance landscape character.
- 7. Landscape enhancements to reinforce gateway to Business Park.
- 8. Proposed hedgerow / hedgebank to south of new road section.
- 9. 10m ecological buffer to the Grindle Brook. Opportunity for tree planting and SuDS ponds to improve the corridor for biodiversity and enhance natural flood management.
- 10. Opportunity to expand wet meadow habitat and enhance character of the tree-lined stream, in accordance with landscape character guidance, and objectives of the 'Grindle Brook' (GB) project within the Clyst Valley Regional Park Masterplan.
- 11. Historic mapping indicates this area was formerly an orchard. Opportunity for new planting here to reflect historic land use and to enhance landscape character.
- 12. Landscape enhancements to central part of site in conjunction with junction improvements. (12)
- 13. Landscape improvements to new junction. (13)
- 14. Landscape enhancements to existing business park and central access road, including new trees, and additional planting. (14)



5.3 Recreational Strategy

Opportunities to provide additional recreational spaces and trails include (note, location of numbers are identified in the above plan):

- 15. Recreational walking trail set within green corridors, provides links between areas of the business park, the farm shop, viewpoints and seating areas.
- 16. Cycle and walking route between village and farm shop, through area of enhanced landscape with seating.
- 17. Picnic areas with seating, provide spaces for breaks and informal meetings, for business park users.
- 18. Opportunities for new seating areas associated with landscape enhancements within existing business park.

5. LANDSCAPE AND ENVIRONMENTAL ENHANCEMENTS



5.4 Biodiversity Enhancements

The primary focus of the design was to retain and buffer higher value habitats, such as trees, watercourses and hedgerows to ensure their continued ecological function. Where possible these features will then be enhanced to increase biodiversity value. For example existing defunct or poor hedgerows will be enhanced through sensitive management and infill planting in gaps with the aim of creating species-rich, tall, bushy hedges in good condition.

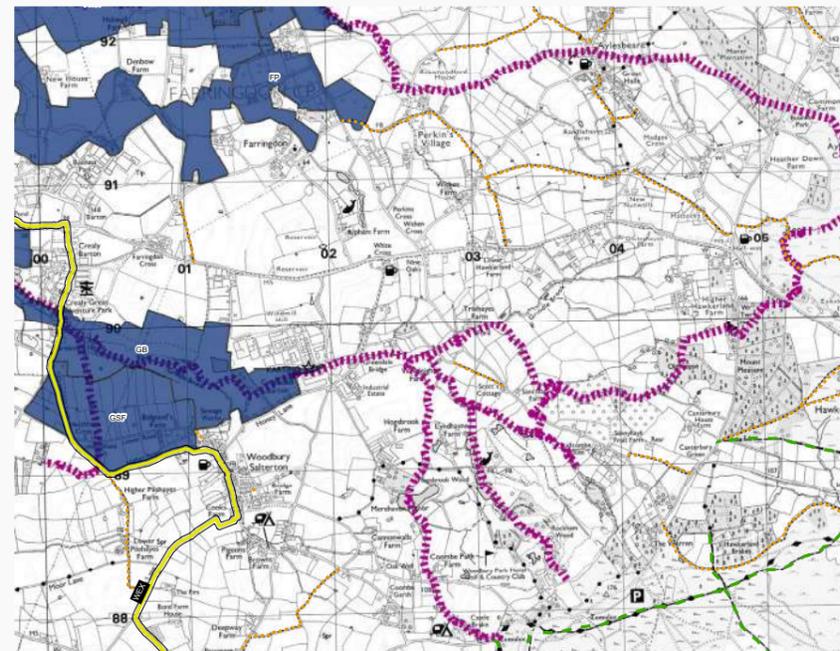
During masterplanning, the Defra biodiversity metric was also used to estimate the habitat required to prevent loss of biodiversity through the removal of low value habitats to facilitate development, such as arable land. This identified that the areas surrounding the development plots, along with the required landscape elements, will be able to deliver a net biodiversity gain through habitat creation such as meadow grassland, orchards, woodland planting and wetland features such as ponds, marshy grassland and reedbeds. New species-rich hedgerows will also be created. These areas will be designed alongside other specialisms, to create multi-functional landscapes, providing flood attenuation, pollination, carbon storage, erosion control and access to greenspace. The built areas will be enhanced with boxes for a range of birds, bats and invertebrates.

Detailed design proposals will focus on:

- Ensuring the mitigation hierarchy is applied appropriately to all phases of development;
- Providing at least 10% biodiversity net gain through habitat creation/ enhancement;
- A phased approach to habitat creation and enhancement to ensure there are no delays between impact and habitat delivery; Increasing canopy cover;
- Meeting objectives of the River Clyst Regional Park, focusing on the Grindle Brook corridor; and, Providing enhancements for any additional species identified during further survey work.



CLYST VALLEY REGIONAL DRAFT MASTERPLAN



EXTRACT FROM CLYST DRAFT REGIONAL MASTERPLAN DETAILED MAP



MASTERPLAN PROPOSALS

NOTES

1. Additional tree planting within hedgerows, including oaks, to assist in visual integration of the new development.
2. Orchard / woodland planting to provide additional visual mitigation.
3. Retain existing woodland around development parcel. Building will likely be seen in some local views, sensitive design approach required.
4. Proposed woodland buffer to provide further screening from Woodbury Salterton and Honey Cottage.
5. Tree belts and new hedgerow to screen Parcel H from the south-east.
6. Additional tree planting within hedgerows, including oaks, to enhance landscape character.
7. Landscape enhancements to reinforce gateway to Business Park.
8. Proposed hedgerow / hedgebank to south of new road section.
9. 10m ecological buffer to the Grindle Brook. Opportunity for tree planting and SuDS ponds to improve the corridor for biodiversity and enhance natural flood management.
10. Opportunity to expand wet meadow habitat and enhance character of the tree-lined stream, in accordance with landscape character guidance, and objectives of the 'Grindle Brook' (GB) project within the Clyst Valley Regional Park Masterplan.
11. Historic mapping indicates this area was formerly an orchard. Opportunity for new planting here to reflect historic land use and to enhance landscape character.
12. Landscape enhancements to central part of site in conjunction with junction improvements.
13. Landscape improvements to new junction.
14. Landscape enhancements to existing business park and central access road, including new trees, and additional planting.
15. Recreational walking trail set within green corridors, provides links between areas of the business park, the farm shop, viewpoints and seating areas.
16. Cycle and walking route between village and farm shop, through area of enhanced landscape with seating.
17. Picnic areas with seating, provide spaces for breaks and informal meetings, for business park users.
18. Opportunities for new seating areas associated with landscape enhancements within existing business park.



PROPOSED STRATEGIC MASTERPLAN 250m 500m

KEY

Landscape structure and features

- Existing trees retained and protected – indicative root protection areas shown, to be verified by a tree survey
- Existing woodland retained, protected and managed
- Existing hedgerows retained, protected and managed
- Proposed tree planting
- Proposed woodland planting
- Proposed hedgerows / restored hedgerows
- Grindle Brook
- Proposed sustainable drainage (SuDS) features
- Wet meadow habitat

Recreational features

- Picnic / outdoor seating areas
- Walking trail
- Cycle route
- Viewpoints

Landscape and visual considerations

- Settlement edge
- Available views towards site
- Local ridgelines

INDIVIDUAL PARCEL OPPORTUNITIES

PARCEL A	
Maximum height of development before becoming visible from AONB	Parcel A has been identified as partially visible from the AONB. The design of any new buildings in this location will consider the wider context views from the AONB.
Potential Use Type	B1 use type. Considering the sensitivity of this parcel it is intended to utilise the space for B1 use. The could potentially provide space for relocating the central offices for Greendale Business Park.
Landscape Strategy	Retain existing woodland around development parcel. Additional tree planting to north of parcel to provide wooded backdrop.
Attenuation strategy	An attenuation basin is provided directly South of Parcel A.
Biodiversity Strategy	Existing tree belts to be retained and buffered to protect root zones. Compensation provided for loss of grassland within area of green space which could be enhanced with scattered trees or an orchard. To provide a net gain, surrounding tree belts could be enhanced through sensitive management. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel A will be provided via the private access road to the Business Park.
Plot Area (Ha)	1.8
Developable Land Area (Ha)	0.74
Phasing	The phasing of parcel A is flexible and can come forward at any stage.



PARCEL A DETAIL PLAN

KEY PLAN

PARCEL D	
Maximum height of development before becoming visible from AONB	10m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Opportunity for tree planting and SuDS ponds to provide natural flood management and enhance the character of the tree-lined stream, in accordance with landscape character guidance, and objectives of the 'Grindle Brook' (GB) project within the Clyst Valley Regional Park Masterplan.
Attenuation strategy	An Attenuation basin is provided to the North West of Parcel D
Biodiversity Strategy	Buffer provided alongside Grindle Brook, used for creation of semi-natural habitats and SUDS/ wetland features, reducing existing agricultural run-off and contributing to aims of Clyst Valley Regional Park. Minimum 10m dark zone provided along riparian corridor to protect nocturnal wildlife. Existing tree belts enhanced through sensitive management. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel D will be provided through the existing business park (currently Greendale South Units 1/2).
Plot Area (Ha)	2.08
Developable Land Area (Ha)	1.09
Phasing	As providing access to Parcel D will require a reconfiguration of the existing Business Park, it is envisaged for parcel D to be one of the last parcels to be delivered.



PARCEL D DETAIL PLAN

KEY PLAN

INDIVIDUAL PARCEL OPPORTUNITIES

PARCEL E1	
Maximum height of development before becoming visible from AONB	12/14m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Additional tree planting within hedgerows, including oaks, to assist in visual integration of the new development and enhance landscape character. Restoration of east – west hedgerow, to provide further visual integration and reinforce the green infrastructure network.
Attenuation strategy	An attenuation basin will be provided to the West of Parcel E.
Biodiversity Strategy	Existing hedgerows and hedgerow trees retained where possible and buffered to allow long-term management. Any losses compensated through new Devon hedgerow creation and enhanced management of existing hedges. Tree planting to increase canopy cover. Agricultural land compensated for and net gain provided through creation of semi-natural habitats and biodiverse SUDS. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel E will be via Parcel F1. Access across Honey Lane will be required.
Plot Area (Ha)	5.62 (including compound area)
Developable Land Area (Ha)	3.88
Phasing	Parcel E will come forward once the strategic landscaping to the South West of the Parcel has matured to the required extent. The delivery of this parcel will follow the completion of Parcel F due to the site access requirements.



PARCEL E1 DETAIL PLAN

KEY PLAN

PARCEL F1	
Maximum height of development before becoming visible from AONB	12/14m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Additional tree planting within hedgerows, including oaks, to assist in visual integration of the new development and enhance landscape character. Restoration of east – west hedgerow, to provide further visual integration and reinforce the green infrastructure network.
Attenuation strategy	An attenuation basin will be provided to the West of Parcel F1
Biodiversity Strategy	Existing hedgerows and hedgerow trees retained where possible and buffered to allow long-term management. New Devon hedgerow creation along eastern boundary to increase connectivity. Tree planting to increase canopy cover. Agricultural land compensated for and net gain provided through creation of semi-natural habitats and biodiverse SUDS. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel F1 will be provided from the private road to the East. It is intended for the road to be widened in advance of the parcel being delivered.
Plot Area (Ha)	5.3
Developable Land Area (Ha)	3.28
Phasing	It is intended for Parcel F1 to be part of the initial parcel to be developed. Some localised widening of the private road will be required for the delivery of this parcel.



PARCEL F1 DETAIL PLAN

KEY PLAN

INDIVIDUAL PARCEL OPPORTUNITIES

PARCEL F2	
Maximum height of development before becoming visible from AONB	12m/14m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Orchard / woodland planting to south of parcel to provide additional visual mitigation. Additional tree planting within hedgerows, including oaks, to assist in visual integration of the new development and enhance landscape character.
Attenuation strategy	An Attenuation basin is provided to the West of Parcel F2
Biodiversity Strategy	Existing hedgerows and hedgerow trees retained where possible and buffered to allow long-term management. Enhancement of existing hedgerows and new Devon hedgerow creation along eastern boundary to increase connectivity. Tree planting to increase canopy cover particularly where this can join up blocks of existing woodland. Agricultural land compensated for and net gain provided through creation of woodland and other semi-natural habitats. Bat, bird and insect boxes provided on building or trees
Access	Access to Parcel F2 will be via Parcel F1 to the North.
Plot Area (Ha)	8.59
Developable Land Area (Ha)	4.29
Phasing	Parcel F will come forward once the strategic landscaping to the South of the Parcel has matured to the required extent. It will also be after parcel F1 is developed due to the access requirements.



PARCEL F2 DETAIL PLAN

KEY PLAN

PARCEL H	
Maximum height of development before becoming visible from AONB	12/14m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Woodland planting to south and east of parcel to provide landscape structure and screen parcel in views from the south-east.
Attenuation strategy	An Attenuation basin is provided to the north of Parcel H (previously Parcel I)
Biodiversity Strategy	Existing hedgerows and hedgerow trees retained where possible and buffered to allow long-term management. Tree planting to increase canopy cover and buffer riparian corridor to north-east. Agricultural land compensated for and net gain provided through creation of woodland and other semi-natural habitats. Field to north taken out of agricultural use and used to create biodiverse SUDS/ wetlands adjacent to the Grindle Brook. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel H will be provided from the private road running south from the existing Business Park. It is intended for this road to be widened in advance of this plot being delivered.
Plot Area (Ha)	14.55
Developable Land Area (Ha)	8.46
Phasing	Similar to Parcel F1 it is intended for Parcel H to be delivered in the short term.



PARCEL H DETAIL PLAN

KEY PLAN

ENERGY AND SUSTAINABILITY

Strategy 3 of the adopted East Devon Local Plan provides the over-arching policy context for the achievement of sustainable development. The strategy, which has been replicated in full below, provides a helpful framework within which to explain the sustainability of the proposals.

The objective of ensuring sustainable development is central to our thinking. We interpret sustainable development in East Devon to mean that the following issues and their inter-relationships are taken fully into account when considering development:

- a. Conserving and enhancing the environment - which includes ensuring development is undertaken in a way that minimises harm and enhances biodiversity and the quality and character of the landscape. This includes reducing the risk of flooding by incorporating measures such as sustainable drainage systems. Developers should maximise the proportion of their developments that take place on previously developed land
- b. Prudent natural resource use - which includes minimising fossil fuel use therefore reducing carbon dioxide emissions. It also includes minimising resource consumption, reusing materials and recycling. Renewable energy development will be encouraged
- c. Promoting social wellbeing - which includes providing facilities to meet people's needs such as health care, affordable housing, recreation space and village halls.
- d. Encouraging sustainable economic development - which includes securing jobs.
- e. Taking a long term view of our actions - Ensuring that future generations live in a high quality environment where jobs, facilities, education and training are readily available.

The proposals for the expansion of the Business Park represent an extremely sustainable form of development with social, economic and environmental benefits. In this section we provide a brief explanation of these benefits and how they achieve the five components of Strategy 3.

- a. Conserving and enhancing the environment

The starting point in developing the proposals contained within this masterplan has been a thorough understanding of the existing environment, including the sensitivity of the landscape and location of ecologically important habitats. The next stage of the masterplanning process has been to develop proposals which inherently respond to this detailed baseline understanding, locating development parcels where they would have the least impact upon the existing environment. The objective of minimising harm has therefore been embedded in the process from the outset.

With the harm minimised, the baseline evidence has then been used to establish the most effective means of enhancing the environment as part of the proposed development. To that end, substantial tree planting is proposed along with areas of dedicated biodiversity enhancement; the combination of which has the potential to achieve an overall net biodiversity gain.

Other environmental considerations have also been taken into account in developing the masterplan. For example, preliminary calculations of surface water run-off have fed into a sustainable drainage strategy which will both capture and clean surface water run-off before discharging it at the existing greenfield run-off rates. In all respect, the masterplan proposals seek to first conserve and then enhance the environment.

- b. Prudent natural resource use

The existing units within the Greendale Business Park are currently powered exclusively by renewable energy generated from one of the two turbines within the on-site anaerobic digestion plant. In terms of energy use, the existing Business Park is extremely sustainable and prudent in its use of natural resources.

The landowner are committed to maintaining this principle in the expansion of the Business Park and to continue to generate the vast majority, if not 100%, of the energy demands from renewable sources. There are a number of options available to achieve this objective such as drawing electricity from the second turbine within the anaerobic digestion plant or roof mounted photovoltaic panels etc.

With these options available, the masterplan proposal combine an opportunity to deliver economic growth with the very prudent use of natural resources.

- c. Promoting social wellbeing

Since the masterplan contains proposals for employment growth, this will not result in an increased resident population with the requisite need for community facilities such as healthcare, affordable housing or education etc. The Masterplan proposals nevertheless seek to address what the owners consider to be an existing shortfall in recreation and amenity space for the workday population.

New recreation routes have been incorporated within both the existing Business Park and expansion areas in order to provide recreation and relaxation space for employees. These new

paths connect to wider recreation opportunities on the Grindle Brook corridor and to the Greendale Café and Farm Shop. This element of the masterplan will enhance the social sustainability and well-being for both existing and future employees.

There is also an important social dimension to the economic development proposals. Researchers have found that those unable to access the labour market are more likely to have mental health problems as a result of poverty, stress, unhealthy behaviours, and the implications for future employment. Sustainable economic development and job creation is not only important for the local economy but for the social wellbeing of the community.

d. Encouraging sustainable economic development

We are undoubtedly at the start of a challenging economic period in the UK. The combined effects off the global Covid-19 pandemic and Brexit have increase public sector borrowing at the same time as substantial job losses. The impact is particularly acute for younger people and those in lower income household.

The proposals within this masterplan would facilitate substantial economic growth. Not only will this lead to a considerable increase in jobs at a time when many sectors of the economy are struggling but it will also increase the Council Business Rates revenue which will support the delivery of

public sector services. The following section of this document quantifies the range of economic benefits associated with the masterplan proposals. In a number of respects, the masterplan proposals would support the economic aspects of sustainable development.

e. Taking a long term view of our actions

Expansion of the Business Park as envisaged within this masterplan will have long-term social, economic and environmental benefits for future generations. At a time when the local economy is facing considerable challenges, the proposals within this masterplan present a welcome opportunity to increase employment and economic output at the same time as achieving social and environmental gains. For these reasons, we consider that the masterplan proposals would contribute to the three pillars of sustainable development.



ECONOMIC BENEFITS

Savills Economic Research Team has produced an analysis of the economic benefits and labour market implications of the Business Park expansion proposals. This analysis is predicated upon the areas identified for development within the masterplan and a number of assumptions based upon the characteristics of the site, local evidence and economic indicators.

In supporting growth and creating these jobs, the expansion of the Business Park as envisaged in the masterplan would result in a range of substantial positive economic benefits. It would help:

