Question 12 - Preference for Location of Future Job Provision

It is acknowledged in the Issues and Options report that there are barriers to business growth across much of East Devon. Therefore, greater provision should be made in the new local plan to support economic development right across the district.

It has been acknowledged widely that there is a significant imbalance between supply of certain forms of employment land and demand in East Devon. Whilst provision has been made for the delivery of larger B8 space in the West End, it is clear that there is a shortage of sites available for small and medium sized businesses elsewhere in the district. These businesses play an important role in the local economy and it is vital that proper provision be made for them in the right locations, for example, close to existing operations and main road networks.

It is logical to continue to focus an amount of large-scale employment provision in the West End, however these sites are not aimed at smaller, local businesses. A strategy which focuses too heavily on the West End limits opportunities for rural employment growth and for rural diversification, which should be encouraged in a rural district like East Devon, and makes it more likely that smaller businesses will be lost to locations outside of the district. More support for provision in other locations across the district is, therefore, needed in the new local plan to meet the needs of smaller businesses and their more specific locational requirements.

To complement the type of employment provision made in the West End, support should be given to employment development in other areas closer to Exeter, such as along the A3052 corridor where there is already a considerable amount of employment and infrastructure and good access to the strategic road network. Employment growth should also be encouraged within, and on land closely related to, the main villages. This would align with key objectives of national planning policy to support prosperous rural economies. To quote paragraphs 83 and 84 of the NPPF:

"Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings."

"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its

surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."

In addition to facilitating business growth, a greater supply of employment land across East Devon would allow for choice and flexibility in the local market, ensuring that businesses have a choice of possible sites to meet their current and future needs. This would also reduce out-commuting and retain more jobs for the district.

Question 13 – Differing Job Sectors in East Devon

Adequate provision must be made for new and growing micro, small and medium enterprises, which play a very important role in the local economy. The Council's own economic development team has identified in its responses to recent planning applications that these micro enterprises account for 90% of the businesses registered in East Devon. This rises to 99% if SMEs are included.

Question 14 - Additional Economic Policy Objectives

The general economic policy areas to be addressed in the new local plan seem appropriate but it is crucial that the new strategic and non-strategic policies enable the significant imbalance between the demand for and supply of sites for small and medium sized businesses to be corrected. The new local plan policies must:

- Support the provision of new/additional B8 sites for small and medium sized enterprises across the district, to complement the large land allocations and development in the West End, which attract a very different form of operator/employment.
- Promote rural economic growth by supporting expansions of existing employment sites that_are
 operating successfully and have reached, or are close to reaching, full capacity. Development
 opportunities in the rural areas are more limited and the success of existing employment
 operations and the potential for their future growth must not be curtailed by overly restrictive
 development management policies.

Question 23 – Promoting Accessibility to Facilities

East Devon is a rural district and opportunities to access developments by walking, cycling and public transport are going to be far more limited than in cities and urban areas. Opportunities will also vary quite significantly between the West End and the villages, for example. This should not prevent good development sites coming forward across the district to meet local needs. Future development management policies must reflect national planning policy and guidance, which is clear that plan-making should take into account that 'opportunities to maximise sustainable transport solutions will vary between urban and rural areas' (NPPF para. 103) and 'sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport' (NPPF para. 84).

Q27 – Retaining and Refining the Existing Settlement Hierarchy

The overall hierarchy needs to be revised to allow some development to be accommodated in a greater number of locations outside of the West End. This will ensure that local needs are met more adequately.

We would suggest that there is some potential for growth around the A3052 corridor, a location which benefits from its proximity to Exeter and where there is already a considerable amount of employment, infrastructure and other development.

Further consideration should also be given to identifying some more growth opportunities in and around the larger / better-served villages. The scale and form of growth can be carefully controlled through local plan policies to manage development in such locations so that it complements the character of the area and helps meet local needs. Such locations will not always be well-served by public transport but can still make a valuable contribution to the district's employment land supply.