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# East Devon Local Plan Regulation 19 (Phase 1)

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**Policy SE02:** Employment Development in the  
Countryside

Representation by Savills on behalf of FWS Carter & Sons

March 2025

### Introduction

1. This representation is submitted by Savills on behalf of FWS Carter & Son (from hereon referred to as 'FWS') owners of Greendale Business Park in response to the Regulation 19 Consultation on the Draft East Devon Local Plan. FWS has instructed Savills on their behalf to submit a series of representations to the relevant policies of the Regulation 19 Local Plan, including this policy.

### Policy SE02

2. There are huge economic growth and productivity challenges within the UK, with growth virtually stagnant for many years. A key objective of the Labour Government is to drive economic growth and planning reform is a key tenet of that objective.
3. In her Statement on 27 January 2025, Chancellor of the Exchequer Rachael Reeves MP set the scene, reaffirming her commitment to delivering economic growth and stating:

*"I am fighting every single day in our mission to kick start the economy, deliver on our Plan for Change, and make working people better off. That includes avenues that others have shied away from.*

*Too often the answer to new development has been "no". But that is the attitude that has stunted economic growth and left working people worse off. We need to do things differently and that journey began as soon as I started at the Treasury in July. These are our next steps and I can say for certain, there is more to come."*

4. There can be no doubt that this Government is committed to delivering economic growth in the short, medium and long-term. To achieve this step change within East Devon will require a policy framework in the Local Plan which moves away from the traditional predict and provide approach and allows for greater flexibility in securing economic growth.
5. Such an approach would be entirely consistent with national policy in paragraphs 85 and 86 of the Framework. Paragraph 85 sets the scene stating that:

*"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support*

*economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.” [emphasis added]*

6. Paragraph 86 then goes on to provide a direct policy requirements for local plans. Of particular relevance to policy SE02 is criterion E of paragraph 86 which states:

*“Planning policies should: ... be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.”*

7. By restricting growth outside of existing designated employment areas, Policy SE02 as currently drafted is unnecessarily restrictive, inflexible and therefore incompatible with the Framework. It does not incorporate the flexibility sought by Paragraph 86 of the Framework and on the contrary restricts economic growth to land within existing operational site boundaries. Such an approach is also in conflict with the spirit of Government economic policy on the drive to support growth. The policy is not therefore consistent with national policy and is therefore unsound.
8. Whilst the allocation of land plays an important part in this and provides certainty, alongside this national policy envisages a flexible approach which enables further land to come forward where it is demonstrated that this would support economic growth in locations which are desired by the market and are capable of responding rapidly to changes in economic circumstances.
9. To that end, and in order to remedy the unsoundness of the local plan, we advocate the addition of the words *"or adjacent to"* within the first paragraph of policy SE02. This change would enable the growth of existing businesses and business parks beyond their existing boundaries where it is demonstrated that they are currently operating at or close to full capacity and that there is a demonstrable economic need which that expansion would satisfy.
10. In addition to addressing the unsoundness of the Local Plan, there would be a number of benefits in making this change to the policy.

11. First, it would provide considerably greater flexibility to ensure that the wider economic needs of the functional economic area are accommodated. As explained within other representations, there is significant change proposed within the Exeter City Local Plan which will see the replacement of many traditional employment areas with mixed use residential and office floorspace. This will inevitably displace existing businesses and remove land and buildings available to a wide range of businesses including many SME and start up operators. These businesses will either close or look to relocate and opportunities therefore needs to be provided to accommodate this growth within the wider functional economic area.
  
12. Second, as paragraph 86 of the Framework suggests, flexibility is required to enable a rapid response to changing economic circumstances. It is impossible to determine and defined through the Local Plan precisely where all businesses will seek to locate. There may be some where the profile of the Exeter Science Park is important, whereas for others affordable, less prestigious surroundings are needed to meet the requirements of the business. Positively supporting growth across a wider variety of locations would ensure that all opportunities are taken to achieve economic growth objectives.

### **Conclusion**

13. In conclusion, Policy SE02 as currently drafted is unduly inflexible, not consistent with the Framework and therefore unsound. A relatively minor change to the policy which enables the growth of existing businesses and business parks where there is a proven economic need, would remedy this unsoundness and deliver economic benefits to East Devon during the plan period.