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East Devon District Council
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06 January 2023

By Email Only

Dear Sir/ Madam

**MLPD 18001 and 21016 On Behalf of Stuart Partners Ltd East Devon Local Plan
2020-2040 Preferred Options Regulation 18 Draft Plan Consultation Response**

On behalf of our client, Stuarts Partners Ltd, we submit representations in relation to the East Devon Local Plan. Our representations should be read in conjunction with representations made by Turleys on behalf of our client and Bloor to do with Denbow New Town, the Council's preferred option for a new town.

Our client is a local company with diverse interests based around agriculture, land, renewable energy, and employment delivery, contributing considerably in excess of 1,000 jobs and £100 Million Gross Value Added (GVA) into the East Devon and sub regional economies.

Hill Barton Business Park is owned and operated by our client. This part of our client's business holds more than 900 jobs on its own, which in turn create significant wealth and prosperity for East Devon district and the sub-region. (Please see attached: Appendix 1 which shows Hill Barton in the context of Denbow and Appendix 2 land; and Appendix 2 land subject of a "live" planning application).

You will see that all the land is in the "West End" of the district. East Devon District Council (EDDC) (and Exeter City Council (ECC)) recognise (s) that:

1. Exeter and the “West End” of East Devon are the economic drivers for the sub-region;
2. their growth cannot be constrained for social and economic reasons.

Whilst there are many elements of the plan that our client fully supports, in this response we raise key themes that require attention by East Devon District Council (EDDC) as part of the due process regarding appropriate consultation of the plan, its policies, and proposed allocations.

We go on to provide supportive specific responses to the plan questions in Appendix 3.

It is clearly in the interests of everyone that a “sound” “East Devon Plan” is adopted as soon as possible, and our client will support the Council in this aim.

The Duty to Cooperate

The Duty to Cooperate places a legal duty on Local Planning Authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The NPPF sets out under paragraphs 24-27 that Local Planning Authorities and County Councils are under a duty to cooperate with each other on strategic matters that cross administrative boundaries. Paragraph 26 specifically notes that joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met within a particular plan area could be met elsewhere. This process within Devon is guided by the Devon Duty to Cooperate Protocol. This protocol includes reference to the development of appropriate housing development strategies across administrative boundaries.

East Devon District Council (EDDC) has a duty to cooperate with neighbouring authorities. Moreover, its Local Plan must align with the requirements of the NPPF and synchronise with Exeter City Council (ECC)’s Local Plan, Teignbridge District Council (TDC)’s Local Plan and Mid Devon District Council (MDDC)’s Local Plan, particularly if it (or any neighbouring authority), cannot show that it (or any neighbouring authority), can viably meet its (their) housing and jobs needs on land in its (their) jurisdiction, as outlined in these representations.

At present, the Council is proposing a 20-year Local Plan to meet its “needs” without harm. This means that the Local Plan will have to earmark land to meet the required housing and jobs numbers projected for 20 years without significant harm to the climate or the environment. Encapsulated, the Council’s present position appears to be that it has

decided to meet its own needs on land in its jurisdiction without reliance on other Councils; but crucially it has not considered the needs of other Councils and whether other neighbouring authorities can meet their development needs. We do not believe that the Local Plan can be found “sound,” in such circumstances, unfortunately.

Taken on, the neighbouring authority, ECC, has also taken the position that it can meet all its development needs on land in its jurisdiction without reliance on other Councils but quite simply this “vision” is undeliverable and unviable mainly because it proposes to build around 8,000 homes on high performing brownfield employment land when it is already 2,000 houses shy (pro rata) of an **at least** housing requirement of 12,000 in the current plan period.

In other words, there is a strong possibility that East Devon will have to accommodate a significant proportion of ECC’s development “needs” because either housing will displace employment land (unlikely in our view) or land will be required for Exeter’s housing needs in other districts, including in the “West End” of East Devon.

Response

East Devon District Council (EDDC) is failing in its Duty to Cooperate, to responsibly and sustainably identify and allocate the most appropriate land for development. Further work must be done to ensure that development is delivered in the most sustainable locations around the Exeter area (irrespective of whether it’s in EDDC, TDC, MDDC or ECC).

The Plan should be prepared and refined via constant dialogue with adjoining Councils and key stakeholders including landowners. If these key stakeholders are not incentivised to take part, significant parts of the plan will probably fail.

Housing Delivery and 5 Year Housing Land Supply (5YHLS)

Neither East Devon District Council (EDDC) nor neighbouring Exeter City Council (ECC) have a robust 5-year housing land supply (*5YHLS).

For EDDC, the annual housing requirement figure has gone up to 946 homes per year because of changes to the affordability ratio which is a key input into the government’s standard method for calculating housing need (the GESP annualised local housing need for EDDC was 900 dwellings). The increased figure combined with a declining supply position means that a 5-year housing land supply can no longer be demonstrated, with EDDC only having 4.68 years of housing land supply with a 5% buffer (Housing Monitoring

Update to year ending 31 March 2022 Report to Strategic Planning Committee, 4th October 2022).

The reporting confirms 4.68 years of housing land supply, meaning a shortfall of 328 dwellings (65.6 dwellings per year over the 5-year period) (Housing Monitoring Update to 31 March 2022).

The new Local Plan will need to demonstrate that EDDC will have a robust 5-year housing land supply at the point of adoption of the plan if it is to be found “sound” at examination.

Response

East Devon’s Local Plan is technically “out of date” (it is more than 5 years old). Securing East Devon’s 5-year land supply is critical to the Local Plan’s success.

The under supply of housing in the current plan period needs to be correctly addressed by the Council and the shortfall should be rectified within the emerging Local Plan.

Our client believes that the Council, in line with Sustainability Appraisal work commissioned by it, should continue to encourage development away from protected landscapes afforded the highest level of national planning policy direction within EDDC (e.g., World Heritage Sites; Areas of Outstanding Natural Beauty; 2/3 of the district is covered by an AONB designation).

Strategic housing and employment development should be focussed within the “West End” of East Devon and/or close to it where the vast majority of key physical, social and community and green infrastructure exists or is planned for. The western end of East Devon (which is where our client’s land is), together with Exeter City is the area considered to be the economic driver for the subregion, and its growth cannot be constrained for social and economic reasons.

The under supply of housing in the current plan period needs to be correctly addressed by the Council and the shortfall should be rectified within the emerging Local Plan.

The Council should positively engage with ECC and accommodate the development “needs” of the City which cannot be met there.

Affordable Housing Delivery

EDDC Housing Monitoring Update to 31 March 2022 confirmed that a total of 241 affordable units were delivered during 2021/22.

The East Devon Local Housing Needs Assessment 2022 report by consultants ORS, Report to Strategic Planning Committee (7th October 2022) states that the Affordable Housing Need in East Devon is forecast to be 3,530 households for the 20-year period 2020 to 2040. The Draft Local Plan states that the affordable housing figure is 4,070 (net). This equates to 204 households per year.

Whilst affordable housing delivery in EDDC is faring better than neighbouring authorities (see Appeal reference APP/Y1110/W/22/3292721 25th August 2022 which noted that Exeter has a demonstrably acute and persistent under-delivery of affordable housing delivering only 6 affordable homes in the last year), a distorted marketplace where house price to earnings ratio is one of the worst in England (and getting worse), will undoubtedly lead to challenges within EDDC to deliver enough “affordable homes” and across the subregion, generally.

Response

The East Devon Local Plan must prioritise securing appropriate, viable levels of affordable housing within the plan period in the context of Exeter’s chronic undersupply and the issue faced across the subregion. Inspectors are giving “significant weight” to undersupply in decisions.

Whilst currently EDDC has fared well in terms of delivery, the current delivery forecast is based on a working assumption of 35% affordable housing being delivered on future qualifying sites that meet the policy criteria, with a lower 15% rate at the second new town. Therefore, it is imperative to evaluate these assumptions against overall plan viability.

Adequate resource for these purposes must be made available.

Employment Land Supply and Delivery

Alongside housing growth, the strategic objectives of supporting business investment, job creation opportunities and building a resilient economy must be at the heart of the plan. Policies will need to help make the district an attractive and competitive place to start, grow and invest in a broad range of businesses, attracting more and higher skilled jobs and attracting and retaining people of working age.

A report to Strategic Planning Committee (22nd June 2021) states that in terms of achieving “matched” housing and new employment provision is around 1/3 (33%) behind in the delivery of new jobs compared to housing since the adoption of the current Local Plan.

There is a growing demand for additional employment land in the district and subregion to serve successful companies wanting to expand into the subregion and for businesses that want to relocate to the subregion. Additionally, there is demand for land to accommodate the strong and sustainable growth of existing businesses across the district and subregion. Supply is falling well short of demand causing significant negative economic and social impacts. The Council independently recognised the imbalance in availability and supply with a Report to Strategic Planning Committee (22nd June 2021).

This is not a new issue. The HotSW Employment Land Study Research Findings, 5th December 2019 found that East Devon frequently failed to fulfil enquiries. The Report to Strategic Planning Committee (22nd June 2021) cited a lack of available, unconstrained sites and concluded that even though there was a supply of allocated sites, that many of these were not coming forward for development, suggesting they are not truly available or viable. Therefore, land ownership and viability must be considered critical deliverability issues when allocating employment sites in this plan.

Taken together EDDC committee papers confirm that the western part of the district is the area identified for strategic growth (this reflects the (Greater Exeter Strategic Plan) GESP which said that the area should accommodate subregional development needs) mainly because the same papers recognise (rightly) that two thirds of the EDDC area is covered in the highest tier restrictive landscape policy designations (67% is AONB).

The neighbouring authority, ECC, does not have a five-year housing land supply putting pressure on the small amount of employment land that is available within the City for alternative uses, and some sites previously allocated for employment have already been granted permission for residential uses.

The draft ECC Local Plan proposes an unsustainable “vision” encouraging residential development on existing high performing employment areas such as Marsh Barton. This would result in the further displacement of employers and occupiers in the City, exacerbating the imbalance with surrounding authorities, and worsening the documented (including in Council papers) demand and undersupply of employment land within East Devon and the subregion.

Response

Simplified, the current shortfall within EDDC and the additional context within adjoining ECC means that the emerging East Devon Local Plan must plan effectively and collaboratively for the sustainable release and delivery of high-quality employment land in the most suitable locations. If it cannot demonstrate that the proposed strategy is appropriate and will meet the Local Plan objectives and the needs of the district and subregion up to 2040, then significant parts of the plan will fail.

It is likely that differing policies and strategies will be needed within East Devon to accommodate the growth that is required. Viably delivering the employment numbers required in the plan period means that more land will need to be released in line with market, district, and subregional needs.

Our client believes that the Council, in line with Sustainability Appraisal work commissioned by it, should continue to encourage development away from protected landscapes afforded the highest level of national planning policy direction (e.g., World Heritage Sites; Areas of Outstanding Natural Beauty; 2/3 of the district is covered by an AONB designation).

Strategic housing and employment development should therefore continue to be focussed in the “West End” of East Devon and/or close to it where the vast majority of key physical, social and community and green infrastructure exists or is planned for.

The Emerging Local Plan Development Strategy / Vision

East Devon District Council’s planning policies are out of date and the district is facing a chronic housing and employment land shortage (along with neighbouring Exeter City).

The plan vision focuses new development on the western side of the district, including a new town and other major strategic developments close to Exeter.

Response

For the reasons highlighted above including significant aggregated undersupply in the current plan period, it is considered that additional land for housing and employment must be allocated, particularly in the “West End”, (away from protected landscapes afforded the highest level of national planning policy direction e.g. World Heritage Sites; Areas of Outstanding Natural Beauty; 2/3 of the district is covered by an AONB designation) which, along with Exeter City, is the area considered to be the economic driver for the subregion; it’s growth cannot be constrained for social and economic reasons.

The Emerging Local Plan Development Strategy / Vision

East Devon District Council's planning policies are out of date and the district is facing a chronic housing and employment land shortage (along with neighbouring Exeter City).

The vision focuses new development on the western side of the district, including a new town and other major strategic developments close to Exeter.

Response:

For the reasons highlighted above including significant aggregated undersupply in the current plan period, it is considered that additional land for housing and employment must be allocated, particularly in the west end, (away from protected landscapes afforded the highest level of national planning policy direction e.g. World Heritage Sites; Areas of Outstanding Natural Beauty; 2/3 of the district is covered by an AONB designation) which, along with Exeter City, is the area considered to be the economic driver for the sub region; it's growth cannot be constrained for social and economic reasons.

Our Client's Land

Our client's land is immediately to the east of Exeter in the "West End" of East Devon district in an area free from planning constraints and earmarked in numerous and various papers (including Council papers) for strategic scale housing and employment development.

Stuart Partners Ltd has submitted a planning application (22/0686/FUL Hill Barton Business Park, Sidmouth Road, Clyst St Mary) to East Devon District Council for an expansion of the business park to accommodate immediately required growth.

EDDC's emerging Local Plan (Strategic Policy 8) indicates that the application site is within an area identified for growth as part of the preferred New Town proposal. National Planning Guidance outlines why the aforementioned application should be considered within the context of emerging policy including a preferred New Town with an emerging Masterplan which shows a development "bookended" by two strategic employment sites: an expanded Hill Barton Business Park; and land at the A30 to the south of the Exeter Airport.

EDDC Members have confirmed that their preferred location for a New Town is on our client's land. Policy 8 proposes, up to 2040, 2,500 new homes and 17.5ha of employment land. Moreover, it proposes 5,500 new dwellings beyond 2040 together with 38.5ha of employment land. Consequently, our client's land is relevant to subregional policy making.

Our client's land as shown in Appendices 1 and 2 is suitable and available to meet East Devon's (and Exeter's) employment needs broadly in line with emerging policy and sub regional needs.

If you require further information about specific aspects of the representations made, please contact us at the above address.

We look forward to further positive dialogue as East Devon Local Plan progresses.

Thank you.

Yours faithfully

James

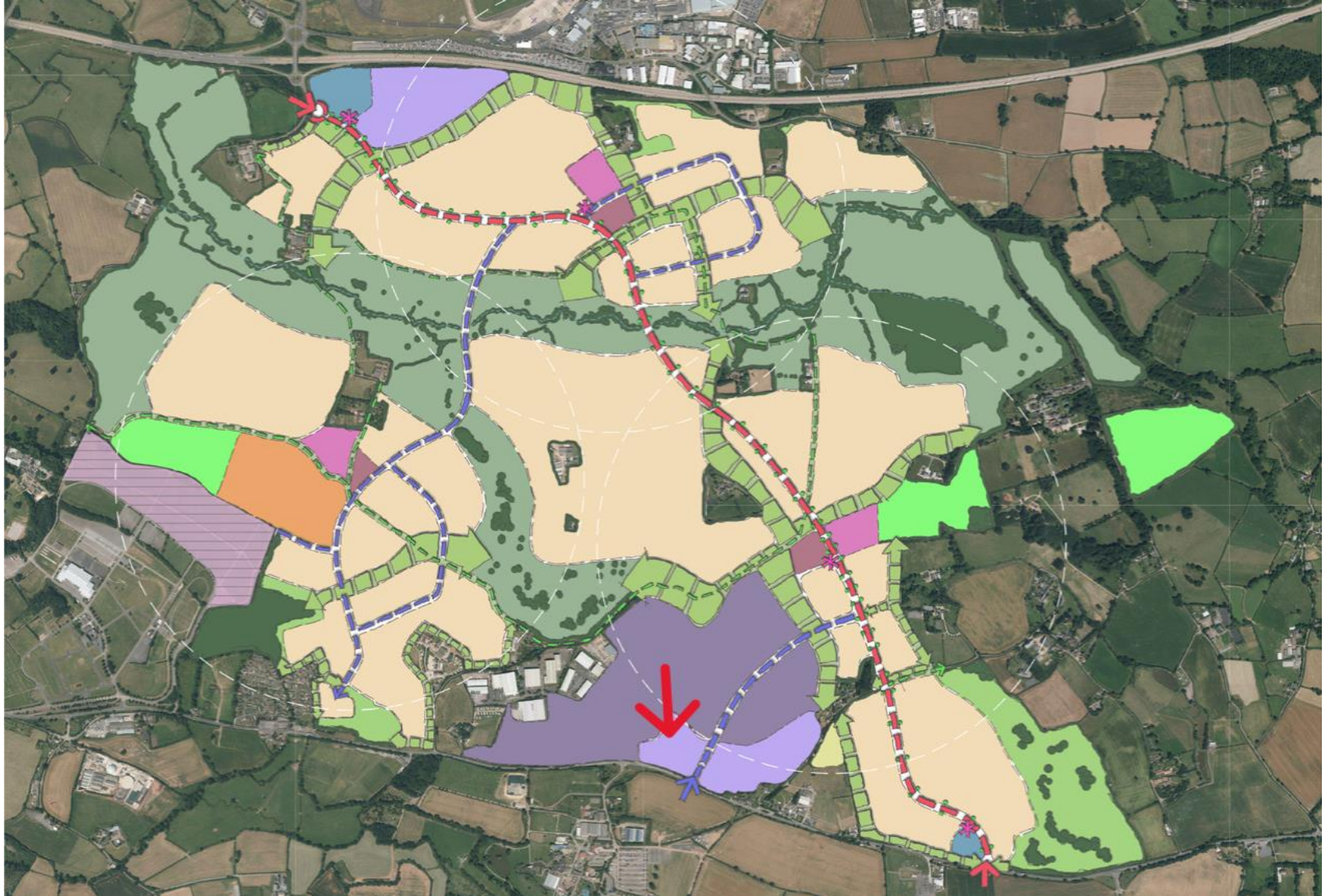
James McMurdo MRTPI MRICS

Director

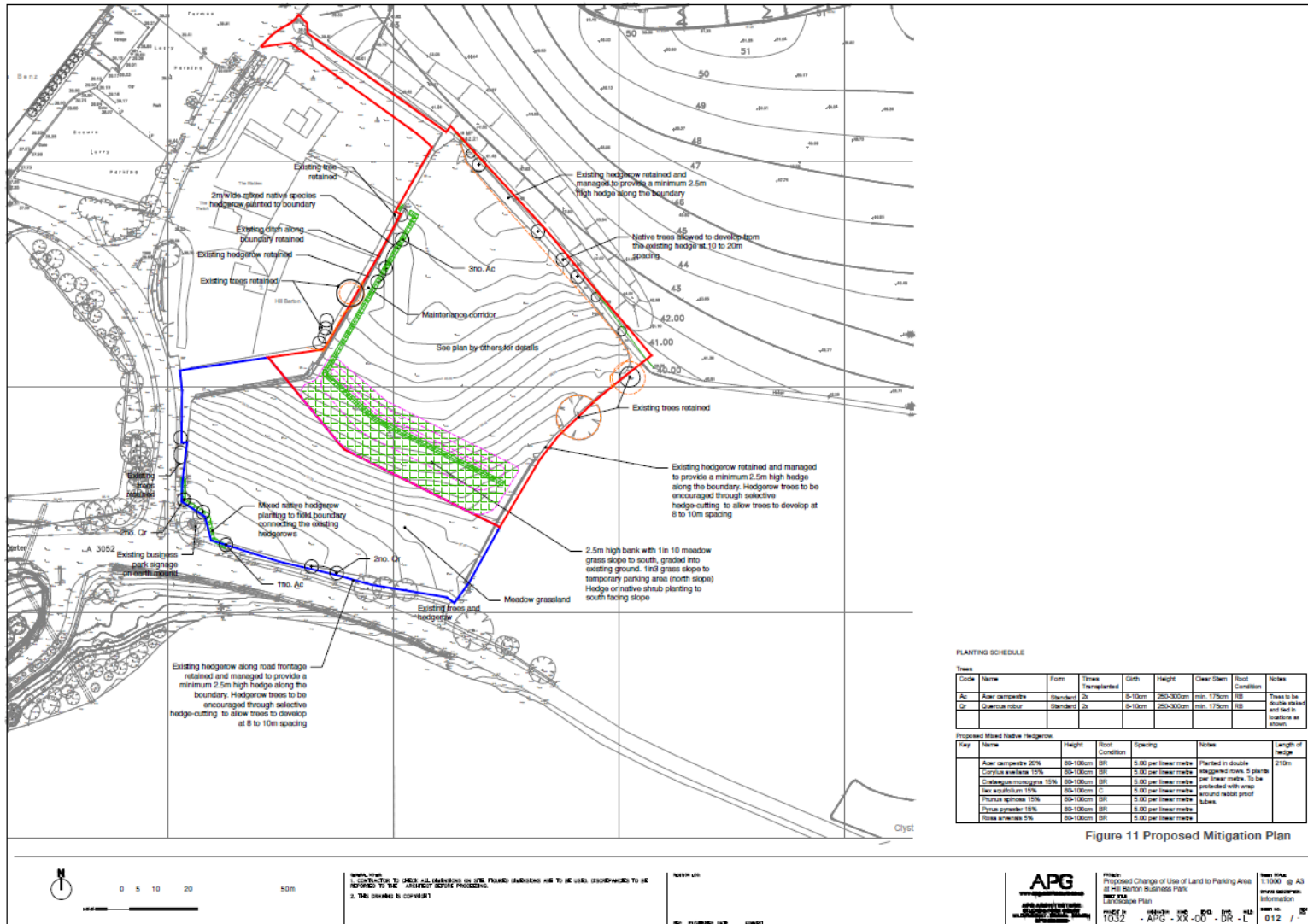
For and on behalf of McMurdo

Copies: Client

APPENDIX 1. Hill Barton in the Context of Denbow Masterplan with Appendix 2 land marked (red arrow)



Appendix 2 Land subject of a “live” planning application.



APPENDIX 3 TABLE OF RESPONSES

| Policy | Comment |
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| 1. Strategic Policy – Spatial Strategy | It is agreed that new development should be focused on the western side of the district including a new town and other strategic developments close to Exeter, avoiding the AONB and other landscape restrictions. |
| 4. Strategic Policy - Employment Provision and Distribution Strategy | <p>Simplified, the current shortfall within EDDC and the context within ECC (the current proposed Exeter Local Plan does not deliver the space or jobs needed in order for the city and the existing businesses based there to expand and grow or provide for existing occupiers to remain in Exeter) means that the displacement of employers and occupiers in the city will create an imbalance with surrounding authorities, putting significant pressure on EDDC, exacerbating the already chronic undersupply of employment land within East Devon (which does not have enough employment land for its own needs).</p> <p>This means that the emerging East Devon Local Plan must plan effectively for the sustainable release and delivery of high-quality employment and be able to demonstrate that the proposed strategy is appropriate and will meet the Local Plan objectives and the needs of the wider district up to 2040.</p> <p>It is likely that differing policies and strategies will be needed within East Devon to accommodate the growth that is required.</p> <p>Further opportunity to comment will be required following the publication of the Economic Development Needs Assessment (EDNA) and any changes to the draft Local Plan this necessitates.</p> |

This policy states that ‘sufficient additional employment land to meet East Devon’s requirements will be identified’. Supporting paragraphs also refer to ‘building a resilient local economy aimed at providing economic prosperity for East Devon’. However, there is no reference to the needs of the wider subregion, specifically Exeter nor the impact of ECC’ new Local Plan policies relating to the redevelopment of existing employment sites or the lack of reliance on greenfield allocations for residential, employment and mixed-use development.

More emphasis needs to be given to the needs of the subregion as opposed to East Devon as a single entity.

Paragraph 3.52 states:

‘3.52. Strategic policy in the plan should make sufficient provision for employment development. This means that the local plan provides an employment provision requirement figure for the whole plan area for the plan period. This accords with the NPPF. This states that the plan should as a minimum apply a presumption in favour of sustainable development when plan-making, where strategic policy should as a minimum provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (as established through Statements of Common Ground), unless circumstances as specified in the NPPF apply. Strategic policy should make sufficient provision for employment development. This means that the local plan should establish an employment provision requirement figure for the whole plan area for the plan period.’

Whilst the supporting text in this policy acknowledges that strategic policy should provide for objectively assessed needs for housing and other uses and the needs that cannot be met in neighbouring areas, there is no dialogue to suggest that the needs of Exeter

specifically have been considered when calculating both housing and employment land need.

The policy and the supporting text recognise the need to secure employment opportunities in the western part of East Devon, acknowledging the geographical advantages for business. Our client supports this approach.

The existing business park at Hill Barton, which will be located alongside the preferred option for a new town has not been specifically included in this policy. Similarly, policy 52 suggests that Hill Barton Business Park is not an appropriate location of the growth of employment uses due to the countryside location and because it is unrelated to an existing settlement/community. This is clearly nonsense as the proposed preferred new town option sits alongside this site. As stated above, as per National Planning Guidance, the land identified must be considered within that context; of an emerging Local Plan policy focus on development in the western end of the district, and more specifically a new settlement at Denbow (10,000 new homes) which will be “bookended” by two strategic employment sites. One will comprise an expanded Hill Barton Business Park and the other, a new site off the A30 to the south of Exeter Airport.

The supporting text to policy 52 also recognises that it is important to East Devon to develop its employment base and where established sites are successful, an intensification of employment uses, or extension of an existing employment site can be considered if this supports additional employment accessible to local communities. *This policy (and policy 52) should support development opportunities at Hill Barton based on its location alongside the preferred option for a new town and within the western part of East Devon, a focus for development within the new Local Plan.*

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| | <p>See comments relating to policy 5 which are also relevant to policy 4. Paragraph 9.24 suggests that the approach to Hill Barton which exclude development leading to the intensification of use or site extension will be kept under review in the context of policy for the new community. It is our clients view that the role and importance of Hill Barton should be reviewed considering its strategic position within the western end of EDDC and its context in relation to the proposed new town.</p> |
| <p>5. Strategic Policy – Mixed use developments incorporating housing, employment, and community facilities</p> | <p>Without the evidence of the EDNA, it is difficult to conclude that the ratios set out for employment provision is adequate to meet the needs of East Devon and the subregion (as above).</p> <p>Paragraph 3.66 notes that the site allocations are intended to meet the identified East Devon employment need, being evidenced by the EDNA. If the EDNA isn't available, it isn't possible to confirm that the site allocations will meet the need across the plan period, nor those of the wider subregion. More sites will likely need to be identified and allocated. Moreover, the Councils Report to Strategic Planning Committee (22nd June 2021) cited a lack of available, unconstrained sites and concluded that even though there were a large supply of allocated sites, that many of these were not coming forward for development, suggesting they are not truly available. Therefore, land ownership and viability must be considered critical deliverability issues when allocating employment sites in Local Plans.</p> <p>Paragraph 3.71 regarding alternative strategies is noted, as is confirmation that EDDC do not have sufficient evidence to make recommendations on alternative approaches. This would confirm the thoughts above that without this evidence this policy cannot be fully assessed as appropriate or not.</p> |

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| | <p>Further sites should be considered for allocation within the western part of the district that can deliver additional employment land in sustainable locations alongside the new town option, such as Hill Barton Business Park.</p> <p>The mechanism for determining the amount of off-site contributions in relation to sufficient employment provision needs to be detailed. The impact on viability of developments also needs to be considered here, and priorities for contributions where they can render developments unviable also needs consideration.</p> |
| <p>6. Strategic Policy – Development inside Settlement Boundaries</p> | <p>Definition of the word modest would be helpful here. The mechanism to assesses a modest adjustment to the settlement boundary needs to be defined here, i.e., number of houses/employment floor space created.</p> <p>It is also important to understand how this policy relates to Neighbourhood Plan consultations which are ongoing alongside the development of the local plan.</p> |
| <p>7. Strategic policy - Development beyond Settlement Boundaries</p> | <p>This policy states that development beyond settlement boundaries will not generally be supported, except where it is in accordance with a specific LP or NP policy.</p> <p>Policy 6 does not allow significant changes to settlement boundaries by NPs, only modest changes, the meaning of which is so far undefined. Policy 7 appears to allow development beyond the settlement boundary where it is in accordance with an NP policy. An NP allocation beyond the settlement boundary could therefore be contrary to Policy 6 unless defined as modest but allow development in accordance with Policy 7.</p> <p>This policy needs further clarification i.e., does this only refer to modest developments beyond settlement boundaries, where allocated by a Neighbourhood Plan.</p> |

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| <p>8. Strategic Policy – Development of a second new town east of Exeter</p> | <p>Hill Barton Business Park sits adjacent to the preferred option for the new town. Other policies in this plan recognise that it is important to East Devon to develop its employment base and where established sites are successful, an intensification of employment uses, or extension of an existing employment site can be considered acceptable where it would support additional employment accessible to local communities. This site would provide job opportunities for residents of the new town and should be considered as a sustainable site for employment uses and allocated as such as part of the plan.</p> |
| <p>9. Strategic policy – Development within the Enterprise Zone</p> | <p>The Council’s third priority is for a resilient economy, suggesting it will support and promote job growth in the district. Elsewhere in the Local Plan, supporting text recognises the importance of industrial jobs to the functioning of the district’s economy and the strong unmet demand for industrial premises, particularly for industrial and logistics occupiers in the West End of East Devon.</p> <p>Exeter is limiting its ability to accommodate B2/B8 uses through proposing widespread redevelopment of its large employment sites and this policy further limits the locations at which these uses can locate. The impact of Exeter’s policy to redevelop existing employment sites and EDDC’s policy which seems to further limit the location of such uses, needs to be assessed in terms of its cumulative impact on employment land supply specifically for industrial uses which appear to be most affected by these policies.</p> |
| <p>16. Strategic Policy – Green infrastructure and the Clyst Valley Regional Park</p> | <p>The mechanism for determining the amount of contributions towards the implementation and long-term management of green infrastructure initiatives needs to be detailed. The impact on viability of developments also needs to be considered, and priorities for contributions where they can render developments unviable also needs consideration.</p> |
| <p>27. Strategic Policy – Climate Emergency</p> | <p>Our client supports the aspirations of this policy.</p> |

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| 28. Strategic Policy – Net-Zero Carbon Development | Our client supports the aspirations of this policy. |
| 29. Strategic Policy – Promoting renewables and zero carbon energy | Our client supports the aspirations of this policy. |
| 32. Strategic Policy – Energy Storage | Our client supports this strategic goal. |
| 33. Strategic Policy – Heat Networks | Consideration needs to be given to how such measures will impact the viability of developments coming forward. |
| 34. Strategic Policy – Embodied carbon | Our client supports the aspirations of this policy. |
| 35. Strategic Policy – Flooding | Our client supports the aspirations of this policy. |
| 51. Policy – Employment development within settlement boundaries | The Council’s third priority is for a resilient economy, suggesting it will support and promote job growth in the district. Elsewhere in the Local Plan, supporting text recognises the importance of industrial jobs to the functioning of the district’s economy and the strong unmet demand for industrial premises, particularly for industrial and logistics occupiers in the West End of East Devon. |

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| | <p>This policy focuses on employment development within settlement boundaries. Development which involves the expansion or intensification of Hill Barton Business Park is not recognised by this policy nor policy 52 despite it being an existing established employment site which sits alongside the preferred new town allocation.</p> <p>The supporting text to this policy acknowledges that the EDNA will provide evidence about the mix of sites needed to support businesses. It recognises that there will continue to be a need for a wide mix of sites in terms of size and quality to suit the needs of businesses now and as they change over time.</p> <p>To exclude further development opportunities at Hill Barton Business Park without such evidence would be premature.</p> |
| <p>52. Policy – Employment development in the countryside Intensification of existing employment businesses in the countryside</p> | <p>The Council’s third priority is for a resilient economy, suggesting it will support and promote job growth in the district. Elsewhere in the Local Plan, supporting text recognises the importance of industrial jobs to the functioning of the district’s economy and the strong unmet demand for industrial premises, particularly for industrial and logistics occupiers in the West End of East Devon.</p> <p>This policy focuses on employment development beyond settlement boundaries. Development which involves the expansion or intensification of Hill Barton Business Park is not recognised by this policy nor policy 51 despite it being an existing established employment site which sits alongside the preferred new town allocation.</p> <p>The supporting text to this policy acknowledges that the EDNA will provide evidence about the mix of sites needed to support businesses. It recognises that there will continue to be a need for a wide mix of sites in terms of size and quality to suit the needs of</p> |

businesses now and as they change over time. To exclude the further development potential of Hill Barton Business Park without such evidence would be premature.

It is noted that paragraph 9.22 recognises that it is important for East Devon to develop its employment base and where established sites are successful, an intensification of employment uses, or extension of an existing employment site can be considered if this supports additional employment accessible to local communities. This enables development to make use of existing sites and infrastructure.

With this point in mind, it is necessary to consider the location of Hill Barton Business Park alongside the preferred location for the new town. As per National Planning Guidance, the land at Hill Barton Business Park must be considered within that context; of an emerging Local Plan policy focus on development in the western end of the district, and more specifically a new settlement at Denbow (10,000 new homes) which will be “bookended” by two strategic employment sites. One will comprise an expanded Hill Barton Business Park and the other, a new site off the A30 to the south of Exeter Airport.

The points made within paragraph 9.23 in relation to the importance of development being sensitive to its surroundings and local amenity are understood. However, the provision of employment carries substantial weight in the planning balance when considered against the lack of robust employment land supply in EDDC and across the subregion. Such matters need to be considered flexibly in recognition of this shortfall; this is especially the case in areas outside of the AONB which are less sensitive to change.

It is welcomed that paragraph 9.23 recognises the need to balance matters of adverse aesthetic impacts relative to the expected economic, social, and environmental benefits of a proposal where there is evidence of high demand for employment development. This

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| | <p>however should be given specific reference within the policy text rather than as supporting text only.</p> <p>Similarly, the reference to additional consideration being given to existing East Devon employers where the proposed development will safeguard valuable existing jobs should be given specific reference within the policy text.</p> <p>Paragraph 9.24 suggests that the approach to Hill Barton which excludes development leading to the intensification of use or site extension will be kept under review in the context of policy for the new community. As above it is premature to exclude Hill Barton Business Park at this stage, considering the lack of EDNA evidence and the preferred new town location.</p> <p>Should Hill Barton Business Park continue to be excluded from both policy 51 and 52, the mechanism for review highlighted in paragraph 9.24 should be outlined here. Given the location of all 3 new town options, and the emphasis on the West End of East Devon for development, Hill Barton Business Park would support sustainable economic development and job creation and the intensification of this site should not be specifically excluded.</p> |
| <p>54. Policy – Resisting the loss of Employment sites</p> | <p>The aspirations of this policy are noted.</p> |
| <p>55. Policy – Employment and Skills Statements</p> | <p>Clarification is needed as to what financial contribution will be required and how it will be calculated. It needs to be clear how contributions will be prioritised in terms of ensure developments remain viable and a recognition that not every contribution may be able to be provided without negatively effecting the viability of a scheme.</p> |

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| <p>65. Strategic Policy – Walking, cycling, and public transport</p> | <p>This policy recognises that, in rural areas, the delivery of this policy will be more challenging. It should be made clear that this policy should be applied flexibly in rural areas to ensure the vitality of such locations.</p> |
| <p>74. Policy – Landscape Features East Devon’s landscape, countryside and rural areas will be protected against harmful development.</p> | <p>The need to conserve landscape character and appearance is recognised. However, the provision of employment carries substantial weight in the planning balance when considered against the lack of robust employment land supply in EDDC and across the subregion. This policy needs to be applied flexibly in recognition of this shortfall; this is especially the case in areas outside of the AONB which are less sensitive to change.</p> |
| <p>77. Policy – Areas of Strategic Visual Importance</p> | <p>The need to preserve the visual integrity, identity, and scenic quality of the district through conserving and enhancing key views of local landmarks is recognised. However, the provision of employment carries substantial weight in the planning balance when considered against the lack of robust employment land supply in EDDC and across the subregion. This policy needs to be applied flexibly in recognition of this shortfall; this is especially the case in areas outside of the AONB which are less sensitive to change.</p> |
| <p>78. Policy – Green wedges</p> | <p>It is noted that the Green Wedge locations and boundaries are currently under review to take account of development and other changes which have occurred since the boundaries were defined in the adopted Local Plan.</p> <p>Comments are likely following the review of Green Wedges.</p> |
| <p>87. Policy – Biodiversity Net Gain</p> | <p>The BNG requirement of 20% exceeds that outlined in the Environment Bill. Whilst justification is provided within the supporting paragraphs, we would dispute that a</p> |

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| | significant increase such as this would not render many developments unviable. Further evidence to support the justification for this increase needs to be presented. |
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