

EAST DEVON LOCAL PLAN 2020-2040

PREFERRED OPTIONS REG.18 CONSULTATION DRAFT PLAN – AUTUMN 2022

REPRESENTATIONS ON BEHALF OF GLANVILL PARTNERS LTD

Introduction

Bell Cornwell acts as planning consultants for Glanvill Partners Ltd, owner of Rydon Farm in Woodbury and large areas of agricultural land in the district. It is in this context that the following comments are made on the draft policies of the East Devon Local Plan Preferred Options. These follow on from representations made to earlier drafts of the plan, notably the Issues and Options version, and Call for Sites, in 2021.

The Vision for East Devon

Our client supports the Vision for East Devon, which encourages a more resilient local economy.

03 The Spatial Strategy of the Plan

1. Strategic Policy – Spatial Strategy

The following comments are made with a focus on the distribution strategy for employment provision.

The overall strategy is to focus most development within the West End of the district. Whilst it is logical to continue to focus an amount of large-scale employment provision in the West End, these sites are not aimed at smaller, local businesses. Therefore, it is right that the spatial strategy also supports development in other locations across the district, in order to facilitate rural employment growth and rural diversification, which need to be encouraged in a rural district like East Devon. Sufficient provision must be made in the new local plan to support economic development right across the district so that growth is not stifled or lost to locations outside of East Devon, local needs are met more adequately and a sufficient supply to allow for choice and flexibility in the local market can be delivered.

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 and via the sensitive/proportionate expansion of existing employment sites. This would align with key objectives of national planning policy to support prosperous rural economies i.e. paragraphs 84 and 85 of the NPPF, which state:

“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;*
- b) the development and diversification of agricultural and other land-based rural businesses;....”*

“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.”

4. Strategic Policy – Employment Provision and Distribution Strategy

The draft policy states that provision will be made for a net increase of sufficient new employment floorspace to meet need and ensure that a choice of appropriate land is available in sufficient quantity, and of the right quality, to drive the economic growth of, and support prosperity in, East Devon. More clarity is needed on precisely what is meant by ‘a net increase’ and ‘sufficient new employment floorspace.’

The draft policy goes on to state that the level of need will be informed by the ongoing Economic Development Needs Assessment, which will be ‘available in time.’ The EDNA will also inform the Council’s site selection and site capacity estimates. This is a fundamental part of the strategy and it is premature to advance the draft local plan in advance of the EDNA being published. There are fundamental uncertainties which have yet to be addressed and which could have significant and important implications for the strategic approach to new development.

It has been acknowledged widely that there is a significant imbalance between supply of certain forms of employment and employment land and demand in East Devon. It is clear that there is a shortage of sites available for small and medium sized businesses across the district, outside of the West End. 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.

Due to the rural nature of the district, the specific location requirements of rural businesses and the scale and nature of some employment uses, such locations will not always be within identified settlements. As is recognised in the supporting text to the draft policy, new jobs must meet local needs and jobs must be located close to residents, reducing the need to travel. With this in mind, the strategic policy must make sufficient provision for windfall employment development to come forward as opportunities present themselves and cannot be overly prescriptive.

Our client owns land at Oaklands Field, located directly off Sidmouth Road in Aylesbeare. There is direct access to the A3052 via an existing access point approved under application reference 15/1605/FUL. There is good visibility in each direction and the access is surfaced and drained at its junction with the public highway. The site has very good access to the strategic highway network. The site is subject to no environmental designations and is located within Flood Zone 1 (low risk). This land was submitted to EDDC’s call for sites in March 2021, and was given reference number **mp131fb**.

It is noted from discussions with the Council’s Planning Policy Manager that the employment sites that were submitted as part of the 2021 Call for Sites consultation have not yet been assessed and that this work is to follow in the coming months. To aid in this assessment, copies of the following documents from the 2021 Call for Sites submission are included with these representations:

- Call for Sites land submission details from March 2021;

- Highways Technical Note, dated 23rd February 2021.

In conclusion, there is insufficient evidence to inform the employment strategy at this time. It is crucial that the EDNA is completed and its findings and conclusions given proper consideration ahead of any finalising of strategic and non strategic employment policies. Ultimately, it is crucial that a sufficient supply of all types of employment land is made available across the district to facilitate business growth and 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, local residents can work close to where they live and to make up the significant shortfall that exists.

7. Strategic Policy – Development beyond Settlement Boundaries

Whilst it is important to protect the landscape, amenity and environmental qualities of the East Devon countryside, this must be balanced against the need to support a prosperous rural economy and opportunities for appropriate and sensitive development must not be stifled by overly restrictive policies that do not allow for such windfall development.

09 Supporting Jobs and the Economy and Vibrant Town Centres

52. Employment development in the countryside

The provision for the intensification of existing employment businesses in the countryside is supported strongly.

The draft wording states that this policy applies to specific companies or businesses and their operational premises. The policy must, therefore, be explicit that development includes the intensification of businesses via the expansion of their operational sites, for example, sites used for self-storage (Use Class B8).

53. Farm Diversification

The inclusion of a rural diversification policy is supported strongly. It has become increasingly necessary for our client to diversify its farming operations in order to future proof the business. Our client has benefitted from current Local Plan Policy E4 in developing a successful local self-storage business, which has resulted in both direct and indirect economic benefits for the local economy, and it is the correct approach to keep carry such a policy forward into the new local plan.

As drafted, draft policy 53 is more restrictive than its predecessor by expressly supporting employment uses, rather than allowing *'proposals to diversify and expand upon the range of traditional agricultural related economic activities undertaken in rural areas...'* A more restrictive approach is likely to prevent other complementary uses that would bring about social and economic benefits, but which would fall outside of traditional employment uses classes, from coming forward, which could prevent additional and much needed income streams. Paragraph 1 of draft policy 53 does not to be so restrictive in terms of uses – the criteria within paragraph 3 of the policy will ensure the acceptability of proposals.