

INTRODUCTION

GB House and Son are the long-standing owners of large areas of agricultural land and business premises in East Devon and, in this capacity, have made representations to East Devon District Council as part of previous consultations on the draft Local Plan and via the related call for sites process, focusing on supporting opportunities for housing and employment growth in and around the district's villages, particularly Woodbury.

Against this background, we have reviewed the policies and information set out in the East Devon Local Plan Regulation 19 Consultation Draft and make the following comments on behalf of our client, which we ask are given due regard in the consultation process.

CHAPTER 9. SUPPORTING THE ECONOMY AND TOWN CENTRES

SE02: Employment Development in the Countryside

GB House and Son objects to Policy SE02 as worded currently and does not consider the policy to be sound, for the reasons set out below.

Policy SE02 is far too restrictive and will limit opportunities to meet the employment land needs of the district. Ultimately, the success of existing employment operations and the potential for their future growth must not be curtailed by overly restrictive development management policies.

As worded currently, Policy SE02 provides no support for any expansion of existing, well-established employment sites beyond their existing operational site boundaries. This overly restrictive approach will stifle growth and will not help to prevent out-commuting to Exeter, which is a significant problem, nor will it help to retain jobs for the district, which is crucial to provide a resilient local rural economy. Policy SE02, therefore, is not justified as it is not the most appropriate strategy when compared to another option that could have been chosen i.e. to support the expansion of existing employment sites where it is clear that a site is at or near full occupancy and there is evidence of local demand for additional employment land/floorspace that cannot be met within the existing operational site boundary. The policy should allow for the expansion of existing employment sites in a manner that is proportionate to the existing operations (subject to being able to demonstrate compliance with any necessary technical criteria). This approach would help to deliver a robust supply of employment land for the district and help to provide choice in the market.

GB HOUSE AND SON
REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19
CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP

In addition to not being justified, Policy SE02 as drafted currently is not consistent with national planning policy. The National Planning Policy Framework (NPPF) (December 2024) contains policy on ‘Supporting a prosperous rural economy’ and paragraph 88 is very clear that:

“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;”*

Without allowing some expansion of existing employment sites beyond their operational boundaries, where circumstances dictate that this is appropriate, Policy SE02 will not facilitate the sustainable growth and expansion of all types of business in the rural area of East Devon.

To be made sound, the following wording (in bold) needs to be inserted into Policy SE02:

*“Building on land within the existing operational site boundaries of a business for intensification or extension of that business and its works and outputs, **and the expansion of existing employment sites in a manner that is proportionate to the existing size and scale of site operations**, will be allowed in the countryside where the business or employment site:*

- A. Is operating in premises that are at or close to full occupancy; or*
- B. Is at or near full occupancy and there is evidence of local demand for additional space; or***
- C. has a proven need arising from new or expanding operational functions.”*

The penultimate paragraph of Policy SE02 states that:

“Any development permitted in accordance with this policy should be readily accessible via a range of modes of transport, ...”

This approach is not consistent with national policy. Paragraph 89 of the NPPF is explicit that:

“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.”

This part of the draft policy must be deleted in order for the policy to be found sound.