

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 3. THE SPATIAL STRATEGY

Strategic Policy SP04: Employment Provision and Distribution Strategy

GB House and Son objects to Strategic Policy SP04 as drafted currently because the level of employment provision proposed is not based on solid evidence. This part of the Local Plan has not been positively prepared to meet the area's critical need for jobs and employment land and, therefore, is not sound.

Strategic Policy SP04 states that the level of provision proposed gives range and choice when measured against a quantified need informed by the (Greater Exeter) Economic Development Needs Assessment (EDNA). The EDNA was produced by external economic development advisors and, perversely, East Devon District Council's own Economic Development officer had no involvement with this assessment. Crucially, this key evidence document that is informing draft economic policies and allocations for the district does not factor in unmet demand for employment land, which is a fundamental flaw in the process. All current demand should be factored in in order for this part of the Local Plan to be sound.

The Local Economic Review (LER) (2023) incorporates the most recent data available and must be used as the key evidence document in the preparation of the new Local Plan. The LER highlights the unmet demand for employment space in the district and this must be taken into account when considering the number of sites that need to be allocated. The LER highlights core challenges and demonstrates that even if every site identified as being potentially developable is developed within the next 21 years, there will still be a shortfall of 42.7ha of employment space (page 37)! Additional sites must be identified to meet local need and ensure there is choice in the market.

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The supporting text to Strategic Policy SP04 lists the employment allocations for the district. Our client objects to this list as drafted currently because the strategy for employment site allocations at the Tier 3 and 4 settlements is not the most appropriate when compared to other options that could have been chosen, for the reasons set out below.

Our client owns Woodbury Business Park, a well-established, successful and popular local employment site in Woodbury (identified on the Policies Map) that caters for small and medium sized local businesses, including young up-and-coming businesses, with the provision of smaller ‘start up’ units. On behalf of our client, we have, throughout the Local Plan process, promoted land adjoining the business park (within the same ownership) for employment use, to facilitate the expansion of the business park to meet the significant local demand for additional employment floorspace in this part of the district (**site reference Wood_31**). This land has not, however, been included in the Local Plan as an employment allocation, which is a missed opportunity and is not the most appropriate strategy for the district. The site is suitable for allocation, is available now and is capable of early delivery, which would make a meaningful contribution to addressing the significant shortfall in the district’s employment land supply and providing a range and choice of employment premises. The allocation of Wood_31 for employment purposes would also help to balance the level of housing growth that is proposed in the Local Plan for Woodbury by providing additional job opportunities to support the growing population and increasing the sustainability of the village overall, making it more self-sufficient.

Our client is asked frequently by existing tenants for additional space to facilitate businesses’ plans to expand but is unable to cater for this, which is stifling the growth of local businesses in East Devon. Woodbury Business Park remains full consistently with a waiting list of occupiers who need space of this type in this part of the district. This proves there is an undersupply and proves the popularity and suitability of this site for local businesses – people want to work here, not least because the rents for space are much lower than those for the large sites in the west end of the district.

The promotion of site Wood_31 has been supported by technical advice on highways (which was submitted to East Devon District Council). The advice covered highway network capacity (there are no known capacity issues), public transport by bus and rail (there are feasible and realistic transport options), cycling (which is a viable and reasonable transport option), highway safety (there have been no recorded personal injury collisions during the last available five year review period), walking opportunities to/from the site and the promotion of other sustainable modes of travel and the

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conclusions are that the allocation of this site for employment purposes can be supported on accessibility and infrastructure grounds.

Our client also commissioned advice from landscape consultants Redbay Design on landscape sensitivity and a Preliminary Landscape Appraisal, dated June 2024, was included with representations made to the East Devon Local Plan Further Consultation in June 2024. Redbay Design considered a development strategy for the site that would take account of the identified sensitivity and seek to avoid undue landscape and visual impacts. The strategy would include a development exclusion zone along the western flank of the site. Minor cutting into the ground would allow for buildings to sit into the site and views would be deflected over buildings' roofs. These measures would create a significant natural containment of the site from principal views from the west. Other mitigation/assimilation measures could include the introduction of new hedgerows, akin to the historic pattern, to contain the area of development and the introduction of new oak trees, which are a key feature of the local landscape.

Wood_31 should be allocated as employment land to facilitate the growth of local businesses, reduce out-commuting to Exeter (which is recognised by the Council as a significant issue) and retain more jobs for the district. As drafted currently, this part of the Local Plan is not consistent with national planning policy objectives of creating prosperous rural economies or the draft Local Plan's own objective of providing a resilient economy and it is not, therefore, considered to be sound.