

# East Devon Local Plan Regulation 19 (Phase 1)

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## Chapter 4: Development at the West End

### Policy Omission: Greendale Business Park

Representation by Savills on behalf of FWS Carter & Sons

March 2025

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## **Introduction**

1. These representations are submitted by Savills on behalf of FWS Carter and Sons (owners of Greendale Business Park) in response to the Regulation 19 Consultation on the Draft East Devon Local Plan. Savills has also submitted representations to Strategic Policy SP04 and Policy SE02.
2. Our overarching objection to the draft Local Plan is that it does not incorporate a sufficiently flexible or positive approach to employment growth across East Devon. Whilst employment land has been allocated, the focus has been on locations and sectors which do not meet all of the economic growth needs of the authority area. This has resulted in a draft Local Plan which is not consistent with national planning policy in the Framework and not therefore sound.
3. There are two remedies we propose to address that unsoundness. Whilst either would address the issue, both in combination would deliver the step change in economic growth which the Labour Government has made one of its top priorities. These two changes are:
  - a) allocate further land for development, including locations such as Greendale Business Park; and
  - b) introduce greater flexibility into Policy SE02 to allow more land to come forward adjacent to existing Business Parks as well as within their boundaries.
4. The latter is covered by our separate representation to Policy SE02. The former – the additional allocation of the land at Greendale Business Park (GBP) – is addressed in this submission.
5. These representations demonstrate that the Council's process in negatively assessing GBP has failed to take into account all available evidence submitted to the Council. The failure to robustly assess, and, in turn, allocate the land for the expansion of GBP within the draft Local Plan means that the plan should be considered unsound.
6. Within the following sections, we will explain why the expansion of GBP should be specifically allocated within the Local Plan. In doing so, we will elucidate why the GBP is:

- **Available for development** with the landowner having confirmed its availability and having continually promoted its expansion throughout the plan-making process;
- **Compatible with the EDDC Spatial Strategy** which seeks to provide strategic scale growth in a sustainable location within the West End of the authority area; and
- **Suitably and sustainably located** in a relatively unconstrained location close to Exeter with good access to the strategic highway network and within close proximity to East Devon's 'New Community' which will introduce a significant number of new residents to the area.

### Available for Development

7. The promoted land is entirely within the ownership of FWS Carter and Sons who have owned and operated the thriving Greendale Business Park for many years. During this time it has grown into a significant contributor to the East Devon economy, employing over 2,000 people and generating over £2.5m of annual business rates revenue for EDDC. A diverse range of companies occupy the GBP, from national and international companies and organisations including FedEx, Royal Mail, Viridor and the NHS, to local start-ups including the award winning Powder Keg Brewery.
8. Savills has submitted representations on behalf of FWS Carter and Sons with regard to GBP at several earlier consultation stages of the Local Plan. These have included:
  - A completed questionnaire, set of written representations, HELAA Call for Sites form, and Strategic Masterplan in response to the Issues and Options Consultation in March 2021;
  - A presentation to Strategic Planning Committee members in November 2022; and
  - A set of written representations in response to the Regulation 18 Draft of the Local Plan in January 2023 which provided commentary on the visions, strategies and policies of the draft Local Plan.
  - A set of written representations in response to the Further Regulation 18 Draft of the Local

Plan in June 2024 which included a revised masterplan for a (reduced) expansion area and a comprehensive sustainability appraisal (to contrast EDDC's own SA for the site (reference Wood\_38)).

9. Further, representatives of GBP submitted written statements regarding the site to EDDC's Strategic Planning Committee on 8 March and 11 March 2024 and spoke at a meeting of the Strategic Planning Committee on 12 March 2024. The statements and the speech raised concerns with EDDC's recommendations for the allocations of new employment sites in the draft Regulation 18 Local Plan, and specifically the reasons for the exclusion of the land at GBP.
10. GBP is clearly available for development and there is significant demand for space at GBP. Despite the challenging economic climate there are no vacancies within the Business Park. To the contrary, there is a substantial, up-to-date register of interests from businesses keen to locate to the Business Park. In our previous representations of October 2022 the register of interests comprised a wide range of businesses with a requirement for a total of 392,000 sq ft which would require circa 4-5 hectares of employment land. In just the six months between January and June 2024, Greendale received dozens of enquiries with a requirement for 337,000 sq ft of floorspace. Over 3 hectares of land would be required to satisfy these enquiries alone. Despite the poor growth of the national economy, this clearly demonstrates that demand for employment land is still very high in East Devon and at GBP in particular, and that this demand is not being satisfied by the currently allocated employment sites.
11. There is significant interest in operating at GBP, especially among Small-Medium Enterprises (SMEs), due to the provision of quality, affordable accommodation. Rental levels are considerably lower than other employment locations within the authority area and given the ongoing inflationary pressures and consequential economic challenges facing many businesses, affordable accommodation is crucial to their long-term sustainability.
12. In addition to accommodation, one of the greatest challenges for businesses, particularly SMEs and start-ups, has been the rising cost of energy. Commercial enterprises do not benefit from the Government energy price cap and so have been particularly hard hit by the energy crisis following

the war in Ukraine. As widely reported in the media, rising energy prices have significantly impacted businesses across the country. This has not been the case at GBP – not only does the Business Park provide affordable accommodation, but it also benefits from its own direct, locally sourced renewable energy. Occupiers have saved money on energy bills in the last year, allowing these businesses to further invest in their productivity and staffing rather than spending money on energy costs.

13. FWS Carter and Sons have invested significantly in the on-site Anaerobic Digestion (AD) plant which, for the vast majority of time, supplies 100% of the electricity needs of the Business Park. Energy generated by the on-site anaerobic digestion plant has been estimated to save occupiers approximately 20% in energy costs when compared to electricity sourced from the national grid, which is a substantial cost-saving for SME businesses. In a drive to further enhance its sustainability credentials and contribution towards net zero ambitions, photovoltaic arrays have also been installed on the rooftops of buildings within the Business Park. Combined the AD Plant and photovoltaics generate sufficient energy to meet the needs of the expanded Business Park.
14. The continued success and expression of confidence in the Business Park has been a catalyst for the owners to investigate the potential for further future expansion.
15. The only reason that this land has not been developed for the expansion of GBP is due to the restrictive wording of the adopted Local Plan, particularly Strategy 7 which limits development outside of Built-up Area Boundaries and site-specific allocations, and Policy E7 which supports extensions to existing employment sites except Greendale (and Hill Barton) business parks.
16. EDDC's own Economic Development Strategy 2024-2029 (EDS) which forms part of the evidence base for the draft Local Plan (ECN002) confirms that there is a 508,000 sqm demand for industrial and logistics workspace which significantly outstrips the 17,000sqm supply within the District. In demonstration of this, page 9 of the EDS includes a number of quotes from local residents and businesses that demonstrate how this lack of supply is actively affecting local business growth in real terms:

*“There is no space available and businesses will just leave rather than wait for workspace*

*to come forward”*

*“The real struggle is the lack of small commercial units.”*

*“We’re so busy trying to find workspace for our growing business, it is hard to focus on other business needs”*

17. The policy position of EDDC within both the adopted and draft Local Plans with regard to GBP actively prevent GBP from assisting in addressing these concerns from local businesses and meeting these economic growth needs.
18. As noted in our previous representations, to avoid an ‘ad hoc’ approach to the expansion of the business park, the owners developed a 10-15 year Masterplan and sustainable vision for its future. A systematic and robust analysis of environmental and landscape considerations contributed to this masterplan, which was produced in late 2020. Robust technical assessments were undertaken to inform this masterplan, including Landscape and Visual Impact, Transport, Drainage, and Ecology. A copy of the masterplan was submitted in support of the HELAA ‘call for sites’ submission which proposed the allocation of the site for employment uses.
19. The benefits of the 2020 Masterplan were assessed and found to be able to deliver a major boost to the East Devon economy:
  - creating an estimated 1,368 new permanent jobs;
  - generating circa £90m Gross Value Added, which represents a 3.5% growth on the GVA in East Devon (2020);
  - delivering an additional £2.3m in business rates, approximately half of which would go to the authority to support local priorities;
  - rebalancing the employment market, diluting the reliance placed upon the service industry and boosting average wages;
  - addressing unemployment; and

- reducing out-commuting from the authority to employment in Exeter and elsewhere.
20. The environmental-led masterplanning of the Business Park demonstrated how these considerable economic benefits could be delivered in a manner which would not have a limited impact on the environment.
21. In 2024, the evidence base for the Regulation 18 draft of the Local Plan included a document entitled 'Employment Site Selection Summary Findings' raised some concerns regarding the potential allocation of the land proposed within the 2020 site boundary including the proximity of a gas pipeline in the south east of the site, a 'sliver' of land within an area of flood risk, and potential landscape impacts in that exercise. To progress positively in light of these concerns, FWS Carter and Sons reduced the scale of the proposed Business Park expansion. The land above the pipeline was removed from the proposed area of allocation, as was the sliver of land that (whilst not proposed for any form of development) fell within the flood risk area. The reduced expansion area was submitted to EDDC within Savills representations to the Regulation 18 Consultation in 2024 and it is this revised area which has been promoted for an allocation through the emerging Local Plan.
22. The site-specific allocation promoted within these representations will enable the expansion of GBP which could deliver a developable area of approximately 10.34 ha (c.103,400 sqm) of new employment space (across two plots with a total site area of 15.26 ha). This would make a significant contribution to addressing the clear need for new employment/business space identified within EDDC's evidence.
23. In summary, this land is clearly available for development.

### **Compatible with the EDDC Spatial Strategy**

24. The Plan and the supporting evidence base provide very strong support for strategic scale growth in the West End of East Devon. The expansion of GBP aligns with the East Devon Local Plan spatial strategy for several key reasons:

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Strategic Location within the West End

25. The Local Plan focuses on directing significant development towards the West End of the District, which includes land near Exeter and along key transport corridors. This area is deemed to be the most sustainable strategic location due to the colocation of housing and jobs. The site falls within this strategically important area, which has been identified for both housing and employment growth due to its connectivity and existing infrastructure. As explained in the following sections, the site is within close proximity to the future strategic-scale new settlement in the West End.

Sustainability and Infrastructure Support

26. The West End is considered a highly sustainable development location because of existing and planned infrastructure, including public transport links, green infrastructure, and employment opportunities. The plan aims to cluster development in areas where services can be efficiently provided, reducing the need for car travel and minimising environmental impact. GBP can both contribute toward and benefit from this existing and planned infrastructure growth.

Economic Growth and Job Creation

27. The spatial strategy supports employment-led growth in the West End. Development on the site would contribute to this vision by providing this employment-led growth for new and existing residents in the area.
28. For these reasons the site is compatible with the Local Plan spatial strategy because it supports sustainable development principles, aligns with infrastructure investment priorities, and fits within the overarching goal of focusing growth in the West End.

**Suitably and sustainably located**

Sustainability Appraisal

29. At Regulation 18 stage EDDC published a Sustainability Assessment Report Addendum which included an assessment of each of the preferred housing and employment sites and ‘reasonable

alternatives' against a set methodology.

30. GBP was identified as site reference Wood\_38 and assessed by EDDC as being a 'reasonable alternative' for the following reasons:

*This site is a reasonable alternative as it has been assessed as suitable, available and achievable in the HELAA for employment use. It is located in the western side of East Devon, where the emerging Local Plan spatial strategy focusses new development. It is adjacent to an existing employment use (Greendale Business Park), where the emerging Local Plan supports employment development subject to meeting certain criteria. In addition, it is not already allocated in a 'made' Neighbourhood Plan, and does not currently have planning permission.*

31. Despite the positive commentary above, EDDC concluded that the site should not be allocated in the draft Local Plan “*due to [its] countryside location with poor access to services and [its] adverse landscape impact.*”
32. To assist EDDC in updating their SA for the reduced expansion area, our Regulation 18 representations critically assessed the 2024 (current) expansion area against EDDC's sustainability appraisal methodology and compared our assessment against the assessment undertaken by EDDC. On this basis it was requested that EDDC reconsider their assessment of the site and proceed to allocate the revised Wood\_38 boundary to enable the sustainable expansion of the business park.
33. To avoid repetition, our Regulation 18 representations are appended to these representations. For ease of reference, an extract of our Sustainability Appraisal from the Regulation 18 representations is provided below.

*Table 1: Extract of Sustainability Appraisal Matrix from Regulation 18 Representations*

Sustainability Objective	EDDC Assessment of 2020 Masterplan Area	Savills Assessment of 2024 Masterplan Area
Biodiversity	0	++

Landscape	-	0
Historic and Built Environment	-	0
Climate Change and Carbon Emissions	-	+
Climate Change Adaptation	0	++
Land Resources	-?	?
Water Resources	-	++
Homes	--	0
Health and Well-Being	+	+
Access to Services	-	++
Jobs and Employment	++	++
Town Centres	-	++
Connectivity and Transport	-	+

34. As demonstrated within the above table, the 2024 Masterplan area scored positively against the sustainability assessment methodology, with no negative scores identified.
35. In support of the current Regulation 19 draft Local Plan, EDDC published an updated Sustainability Appraisal (*East Devon Local Plan 2020-2042 - Publication Draft Local Plan Sustainability Appraisal report, February 2025* (Document reference CSD003). Page 311 of the this document recognises ‘Land adjoining Greendale Business Park (Wood\_38)’ as a ‘reasonable alternative’ among four other potential employment sites.
36. Notably, the Council’s SA acknowledges that the expansion of GBP is consistent with the Local Plan and national policies:

*“The employment sites are located adjacent to existing employment areas, rather than isolated locations, consistent with Local Plan and national policies.”*

37. Further, it states that:

*“The reasonable alternatives listed above have all been assessed as **suitable, available and achievable** in the HELAA which provides evidence that they have potential to be delivered (subject to further consideration through the planning process).” [emphasis added]*

38. Regrettably, this further assessment of the site does not reflect the boundary of the revised masterplan submitted at Regulation 18 stage despite the February 2025 SA being published eight months after the revised boundary was submitted in June 2024. The SA instead assessed the entirety of the original Wood\_38 boundary from the 2020 Masterplan. It has then concluded on page 325 that the site *“is rejected due to countryside location with poor access to services and adverse landscape impact.”*
39. The Sustainability Appraisal has not assessed the correct site boundary for Greendale Business Park which has led to the draft Local Plan failing to properly consider (and in turn allocate) the revised boundary for GBP submitted at Regulation 18 stage. This component of the evidence base is therefore flawed and does not accurately appraise the site against the SA objectives.
40. It must also be noted that various consultees at Regulation 18 stage also raised issues with the Council’s Sustainability Appraisal. Pages 171 to 173 of the *Reg 18 Further Consultation Feedback Report Summer 2024* (document KSD005) confirm that out of 66 respondents, only 20 (30%) of respondents were either ‘satisfied’ or ‘very satisfied’ with the SA.
41. Statutory consultees were amongst those who raised issues with the SA. Most notably for GBP, Historic England stated:

*“Note that it should not be assumed that in all circumstances the presence of listed buildings on site means that development would result in an adverse impact – need to understand the significance of the asset and likely impact of development on that significance.”*
42. Despite this, EDDC’s 2025 SA continues to score Wood\_38 negatively (‘-’) against SA Objective 3 (Historic and built environment), stating:

*“Grade II listed Greendale Barton is located in the centre of Wood\_38, on the southern edge of the existing business park. Grade II listed Brooklands Farm is around 30m from edge of site in north west – mature trees obscure views into the site, but potential negative impact upon this asset.”*

43. EDDC has failed to take into account the feedback from Historic England or the updated land proposed for development. Simply because a listed building is present nearby the site it does not automatically mean that there will be an adverse impact, which can be assessed at application stage after the site is allocated. We consider that the correct score for this objective should be ‘0’ on the basis that there will be a negligible impact upon the setting of the listed building.
44. It is strongly recommended that EDDC revisit its Sustainability Appraisal to assess the correct site boundary for the expansion of GBP, take into account the issues raised by various consultees with regard to the SA, and give due regard to the highly sustainable nature of the site.

#### Site Selection Report

45. EDDC has published a document with the Regulation 19 draft of the plan called “*Site Selection report Employment Site, Greendale Barton*” (SAL 017).
46. Like the SA, this assessment has been undertaken on the original 2020 site boundary, not the revised boundary submitted in 2024, and reviews the potential constraints at a very high level without regard to the opportunities for mitigation. The potential constraints identified are considered to be over-stated and do not take into consideration the evidence submitted in support of the allocation through the previous consultation stages of the Local Plan.

#### *Infrastructure and Accessibility*

47. Under the Infrastructure heading, EDDC and Devon County Council have stated the following:

*“The site contains one main existing business park and several smaller areas in business use. DCC state - The highway network already has capacity issues, there are limited public transport options and distance from the main attractors is beyond most walking and cycling*

*distance. There are numerous sites in the vicinity and they need to be considered in a comprehensive masterplan and access strategy.”*

48. Further, under the Accessibility heading, EDDC stated the below:

*“Site adjoins an existing employment site. All of the site is (just) within 1,600 metres of a bus route with an hourly or better service. Poor pedestrian or cycle accessibility.”*

49. These statements fail to recognise the enhancements to accessibility that were identified within section 4.3 of the submitted Masterplan. The Masterplan identified a range of measures that could be provided by the comprehensive extension of GBP to encourage active and sustainable modes of travel.

50. All new internal roads within the masterplan area would be accompanied by footways, and a network of off-road pedestrian/cycle links would be provided within and around GBP. Perhaps of most interest to the local community, these links would include a new pedestrian/cycle path between the Greendale Farm Shop and the community of Woodbury Salterton, to support and formalise an existing desire line between these areas. Such a link would also support active commuting for those that live in Woodbury Salterton and work at GBP.

51. Further, the Council’s own evidence supports the delivery of new active and sustainable travel links to and from the Greendale area, which, if delivered, would further enhance the sustainability of GBP. Page 18 of the ‘Clyst Valley & New Communities LCWIP’ (document TRI 018) includes two recommended projects with relevance to GBP:

- *6. A3052 Sidmouth Road: There are key destinations on this route including Westpoint Area, Hill Barton Business Park, Crealy Theme Park & Resort, Greendale Farm Shop and Business Park, with this route identified in the Exeter LCWIP. All new settlement options in this area would further increase demand on this route. A high-quality protected route, separated from the carriageway by a buffer should be delivered between Clyst St Mary and Greendale. To include crossing points (e.g. signalised crossings) for the Clyst Valley Trail, Cat & Fiddle, Crealy, and Greendale. This would*

*require engagement and negotiation with landowners.*

- *8. Woodbury Quiet Lanes: Several quiet routes linking Woodbury to nearby destinations were proposed by stakeholders and are shown in yellow. While there are housing sites identified in Woodbury in the current Local Plan, the absence of a major new settlement in the immediate vicinity would make securing funding for significant cycling infrastructure in this area challenging. The quiet lanes could be progressed at relatively low cost through use of wayfinding and minor works to reduce motor traffic volumes and speeds to improve conditions for active travel.*

52. Both schemes will require engagement between EDDC and landowners. The expansion of GBP would be well-placed to link up with these LCWIP projects, in turn supporting the sustainable use of these routes and to enhance travel to GBP by active and sustainable modes of travel. Indeed, within the Council's site assessment, under 'opportunities' it has recognised that "*the site includes a significant employment site and could provide pedestrian/cycle links through it and to the wider area*".
53. In addition, by locating employment growth at an existing business park with a clear demand for expansion, it will make the best use of existing infrastructure. Unlike other proposed allocations, no new major highways or infrastructure (with its associated carbon) would be required to sustainably expand GBP.
54. It is also important to note that there will in the future be a significant increase in the number of potential employees residing within active travel distance of the Greendale Business Park. The draft Local Plan currently intends to allocate land for a major new settlement in the West End of the District, immediately to the north of the Business Park. The 8,000 new homes that are anticipated to be delivered will introduce thousands of potential employees within walking or cycling distance of the business park. The proposed expansion of GBP would directly complement and help meet the employment needs of the new town and encourage the use of sustainable modes of travel between the new homes and a wider range of employment opportunities.
55. The assessment also claims that the site is 'just' within 1,600m of a bus route with an hourly or

better service. GBP is directly served by the 58/58A bus which operates throughout the day between Exeter Bus Station and Exmouth and stops in the centre of the Business Park. For Exeter residents, this service enables employees to arrive at the Business Park on weekdays at 08:48 and leave in the afternoon at 17:19 (or earlier). For Exmouth residents, they may arrive at 08:01 and leave at 17:19 (or earlier). Further, a more frequent half-hourly service 9/9A runs between Exeter and Honiton/Seaton which serves stops at the entrance to Greendale Business Park on Sidmouth Road (A3052). Employees that live in Woodbury Salterton are approximately 800m from the centre of the business park. This is considered an acceptable distance for walking and cycling, as set out within guidance produced by the Chartered Institution of Highways and Transportation. GBP has clear access to sustainable travel links.

56. Beyond the above, there are further opportunities to enhance the accessibility of the site as part of its expansion. Opportunities include:

- The introduction of electric vehicle charging facilities, powered by locally generated renewable energy to support travel by electric vehicles. As confirmed by the UK Government on 28 September 2023 alongside its Zero Emission Vehicle Mandate, “the switch to zero emission cars and vans will be the single biggest carbon saving measure in the UK’s journey to net zero”
- Enhanced bus transport and travel planning measures to encourage sustainable patterns of movement;
- The provision of a pedestrian footpath to connect to the bus stop of the A3052.

57. EDDC’s negative assessment of the site with regard to infrastructure and accessibility should be reviewed and re-considered in light of the above.

#### *Landscape*

58. With regard to landscape, EDDC stated the below:

*“Medium sensitivity. The site is not in a designated landscape. Medium-Limited sense of*

*the site from the A3052 to the north, but views from the access road quickly become apparent showing the extensive existing business park in the foreground and fields beyond. There are open views of the site from lane (Warkidons Way) to the south, which show the built form of the existing business park set lower down the valley, along with Hogsbrook Farm buildings to east, surrounded by rural context of agricultural fields rising to the south. Similar findings for view along White Cross Road and Honey Lane - predominantly rural context, with the presence of existing business park in views to the north.”*

59. The assessment report also includes a ‘Landscape Sensitivity Assessment’. This ultimately concludes:

*“Medium. The site is partly previously developed but this is restricted to the less visually obtrusive lower valley slopes. Further development would be more visible in short, medium and longer range views.”*

60. In developing the Masterplan, landscape sensitivity, and the potential visibility of new development at the Business Park, were assessed using LiDAR land height data and photography. A ‘Zone of Theoretical Visibility’ assessment was undertaken, to understand the impact of new buildings of varying heights across the business park expansion land. Views from Woodbury Salterton were also considered and assessed.
61. Visibility from key receptors was a key factor in the masterplanning of the site, and indeed landscape impact was the driving force behind the selection of the areas proposed for development. This robust exercise found that the development of Plots F1 and H (the two development areas within the reduced site boundary) could reach heights of 12m-14m before they would become visible from the National Landscape to the south of GBP.
62. It is recognised that the development of the site would change the local landscape character. To assist with integrating the expanded business park into the local landscape, additional tree planting in the forms of orchards and woodlands are proposed at the perimeter of the masterplan area to provide a natural form of visual mitigation from viewpoints in Woodbury Salterton. As noted within

the masterplan, these interventions would mitigate any perceived negative impacts on the landscape.

63. We therefore wholly disagree with the conclusions of EDDC with regard to landscape impact.

*Historic Environment*

64. With regard to heritage, EDDC stated the below:

*Medium - There is evidence of prehistoric enclosure and field boundaries. An archaeological survey is needed prior to development and it may be possible to design a layout to incorporate any subterranean remains. Grade II listed Greendale Barton is located in the centre of the site, on the southern edge of the existing business park. Grade II listed Brooklands Farm is around 30m from edge of site in north west - mature trees obscure views into the site, but potential impact upon this asset.*

65. Further to the above, the Council's report also includes a 'Historic Environment Site Assessment'. This ultimately concludes:

*"Medium: no significant effects which cannot be mitigated. An impact is predicted, but would not compromise the asset(s) cultural heritage value to the extent that the attributes that led to its designation, or ability to understand or appreciate its value, are diminished or compromised. Mitigation may make the impact acceptable. The overall significance of the asset would not therefore be materially changed."*

66. As recognised within EDDC's assessment, the Business Park contains Greendale Barton, a Grade II Listed Building. This building is used as the headquarters of Greendale Group, has been directly associated with the operation of the business park for a number of years and is established within its industrial/commercial setting. The Grade II Listed Higher Greendale Farmhouse sits outside of the proposed Business Park boundary. The Masterplan was prepared with a robust understanding of the heritage assets within and near the site. At this stage it is not anticipated that the proposed expansion of the business park would cause any physical harm to heritage assets, nor would it

impact upon the significance derived from its setting due to the existing context of these buildings.

67. The Council's conclusion that there are no significant effects which cannot be mitigated is welcome, however on that basis it appears irrational to conclude the impact would be 'medium'. At most it should be characterised as a 'minor' adverse impact.

*Ecology*

68. Under the 'Ecology' heading, EDDC concluded:

*"Minor adverse effect predicted (not significant). Several TPOs cover parts of the site. Hogsbrook Farm County Wildlife Site located 131m to south."*

69. The 2020 Masterplan demonstrated that the site is capable of delivering significant on-site gains in biodiversity. The preparation of the masterplan was informed by a detailed desk-based ecological study and an on-site Phase 1 Habitat Survey which found that the site mainly comprised agricultural (arable) land with low ecology value.
70. The masterplan was subsequently designed with the biodiversity metric in mind, along with the objectives of the Clyst Valley Regional Park (with specific focus on the Grindle Brook corridor). Development areas were concentrated on those parts of the site with low biodiversity value, with surrounding areas providing a net biodiversity gain through habitat creation. New habitat features were proposed, such as meadow grassland, orchards, woodland planting, wetlands, new and enhanced species-rich hedgerows, along with bird/bat/invertebrate boxes within built areas.
71. The 2024 updated boundary reduces the amount of land that would be sought for a development allocation. While the area of land sought for allocation has reduced, BNG enhancements can still be provided outside of the allocation areas, and FWS Carter and Sons have committed to providing at least 25% BNG through the development of the site if allocated. This extends beyond the statutory minimum and the draft Local Plan Policy requirement and therefore should be considered a significant positive in this regard.
72. As recognised by EDDC, the proximity to the Hogsbrook Farm County Wildlife Site is noted, though

mitigation for negative effects on these sites via financial contribution is only required by proposals that include overnight accommodation. The site, as an employment site, would not include overnight accommodation, and therefore financial mitigation would not be required from the proposal as there would be no impact.

73. As there would be no impact on the County Wildlife Site, no impact on trees subject to Tree Preservation Orders through sensitive design, and due to the potential for the development to deliver a significant net gain in biodiversity units, we consider that the development would deliver a net benefit to ecology as opposed to the minor adverse effect assumed by the Council.

#### *Other Constraints*

74. Under the heading ‘other constraints’, the council have raised the following items:

*“Northern tip of site may contain Grade 2 agricultural land, but the remainder is Grade 3. A slither of Flood Zone 3 and high surface water flood risk bisects the central part of the site, east to west. Flood risk also present on western and eastern fringes. Most of site, except southern and eastern edge, is within waste consultation zone. No overhead high voltage electricity lines. High pressure gas pipeline and related safety/buffer zones lie beneath 26.8 Ha of site. Also 24.5 Ha on land with existing employment development. Discount 51.3 Ha to reduce gross development area to 20.8 hectares. Southern part of site is within (outer) water protection zone. Part of the site (the field north of Honey Lane- approx 3.7 Ha) is within the proposed Clyst Valley Regional Park. Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan.”*

75. The reduced site boundary does not include any Grade 2 agricultural land and the developable areas within the expansion area are not located within Flood Zone 2 or 3 (being Flood Zone 1, low risk). The reduced site is also not located directly over a gas pipeline. The site’s location within waste consultation or gas pipeline safety zones should not preclude the site being allocated for employment development – the HSE’s guidance does not advise against low sensitivity land uses (such as factories) being developed within their consultation zones<sup>1</sup> and the HSE would regardless

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<sup>1</sup> <https://www.hse.gov.uk/landuseplanning/methodology.htm>

be consulted at planning application stage if the sites were allocated.

76. Finally, in its conclusion, the Council has provided the following statement under ‘Reasons for allocating or not allocating’:

*“Countryside location remote from facilities (these are not accessible on foot and there are no cyclepaths). Landscape impact varies across the site but the least intrusive areas have already been developed and the undeveloped parts of the site will be much more visually intrusive. The position and extent of the HSE High Pressure Gas pipeline and its safeguarding zones across the central/ eastern part of the site, plus the amount of land within the Flood Zone, reduce the site capacity. Sites to the west might be achievable but they are quite visible in the wider landscape (and the least visible field is within the proposed CVRP extension) and are not well related to the existing business park.”*

77. As demonstrated within this representation, the site is sustainably located for its proposed use and the concerns expressed, including those regarding landscape impact, the gas pipeline, flood risk and agricultural land have all been eliminated by the reduction in the size of the expansion area as submitted in 2024.
78. In assessing the site, EDDC should also consider the substantial and significant benefits that would be provided by the expansion of GBP. The economic benefits of delivering the masterplan in full have been set out earlier in these representations.

### **Conclusion**

79. The assessments that EDDC have undertaken to date, and resulted in the decision not to allocate GBP for expansion within the draft Local Plan, have been based on an out-of-date site boundary that was submitted to EDDC as part of a HELAA submission in 2020. These have not taken into account the updated boundary or information submitted by EDDC during the Regulation 18 consultation stage in 2024.
80. As set out within our representations to Strategic Policy SP04, whilst there is a large quantity of

land allocated for economic growth in the draft plan, the location and type of that land will not suit all businesses. It is for this reason that despite the availability of land elsewhere in East Devon, the owners of the GBP receive regular enquiries from local businesses for space. Since there are no vacancies within the Business Park (as evidenced by the Employment Land Review – ECN004 – Pages 68-73), these enquiries have to be rejected.

81. With housing, there are some households able to afford a house which meets their needs and others who are in need of housing which is available to rent below average market rates. The same is true for employment. Part of the popularity of GBP is that it provides (a) more affordable accommodation than other employment locations within East Devon; and (b) the onsite generation of renewable energy which is provided to the units below market levels keeps the cost of business operations lower than elsewhere.
82. At a time of stagnant economic growth and national Government concerns over productivity, the Local Plan policies and proposals must support a wide range of employment opportunities. This needs to include not only the high profile business parks such as Skypark and the Science Park, but the more affordable employment locations across the authority area.
83. Further, expanding successful existing employment destinations is considered a more deliverable, sustainable and sound process for allocating employment sites to meet this need than EDDC's current strategy which generally seeks to identify entirely new sites for employment within or adjacent to settlement boundaries or as part of larger housing allocations. Past experience has demonstrated that this approach has failed to deliver the necessary quantum of additional employment.
84. Allocations for employment land at the GBP would be delivered and occupied in a very short amount of time, subject to securing the necessary post-allocation consents. This contrasts with EDDC's current approach to allocating new employment land, where new strategic infrastructure may need to be funded, approved and delivered first before any employment opportunities are delivered, or allocating small sites which may have no evidence demonstrating that there is any market interest in those particular sites.



- 85. GBP is a sustainable location for further employment growth. Its location adjacent to EDDC’s preferred option for the 8,000-home new town will provide employment in close proximity to new residents and encourage the use of active and sustainable modes of transport. There are also opportunities to enhance public transport accessibility and incorporate sustainable travel infrastructure such as electric car charging points as part of the expansion.
- 86. Furthermore, the business park is powered by an on-site anaerobic digestion plant and photovoltaic panels which generate further energy from renewable sources. The new businesses on site would therefore benefit from locally generated renewable energy from an energy supply which is already in situ.
- 87. In conclusion, it is recommended that EDDC fully review its assessment of the expansion of GBP against the assessment methodology and reconsider the many positive reasons for allocating the site for employment uses. Through the revisions to the boundary of the Business Park expansion that were submitted in 2024, and the explanation given in these representations, we consider the very significant economic benefits of doing so substantially and demonstrably outweigh the harms.

**Recommended Change to the Local Plan**

- 88. For the reasons set out above, we consider that the following policy should be introduced into the Local Plan:

<b>Strategic Policy XXX: Employment Land at Greendale Business Park</b>
An area of 15.26 hectares of land, as shown on the Policies Map, is allocated for new business units.  The following uses will be considered appropriate: <ul style="list-style-type: none"><li>A. B2;</li><li>B. B8.</li></ul>

The following information will be required to inform any planning application:

- Landscape and Visual Impact Assessment;
- Sustainable Drainage Strategy;
- Biodiversity Net Gain Assessment;
- Heritage Statement; and
- Transport Assessment.

This policy does not apply in the Cranbrook Plan area.

## **Appendix A:**

# **Savills Regulation 18 Representations on behalf of FWS Carter and Sons (including Strategic Masterplan Addendum) (2024)**

# East Devon Local Plan 2020-2040 Further Regulation 18 Consultation

Representations by Savills  
on behalf of FWS Carter & Sons



## Introduction

1.1 These representations are submitted by Savills on behalf of FWS Carter and Sons in response to the Further Regulation 18 Consultation on the Draft East Devon Local Plan, which is currently being consulted upon until 27 June 2024. These representations have been submitted in response to the 'New Employment Site Allocations' section of the current consultation with specific regard to Greendale Business Park (site reference: Wood\_38).

### Previous Representations

1.2 Savills has submitted representations on behalf of FWS Carter and Sons with regard to Greendale Business Park at several earlier consultation stages of the Local Plan. These have included:

- A completed questionnaire, set of written representations, HELAA Call for Sites form, and Strategic Masterplan in response to the Issues and Options Consultation in March 2021;
- A presentation to Strategic Planning Committee members in November 2022; and
- A set of written representations in response to the Regulation 18 Draft of the Local Plan in January 2023 which provided commentary on the visions, strategies and policies of the draft Local Plan.

1.3 Further, representatives of Greendale Business Park submitted written statements regarding the site to EDDC's Strategic Planning Committee on 8 March and 11 March 2024 and spoke at a meeting of the Strategic Planning Committee on 12 March 2024. The statements and the speech raised concerns with EDDC's recommendations for the allocations of new employment sites in the draft Local Plan, and specifically the reasons for the exclusion of the land at Greendale Business Park (Wood\_38).

1.4 Each submission has demonstrated that the allocation of Wood\_38 would be suitable, available and achievable in delivering economic development over the plan period.

- 1.5 Savills representations have also made the case that the Local Plan should identify a substantially larger amount of employment land than is currently allocated in the draft Local Plan. Previous representations noted the challenges and issues associated with EDDC's current strategy, which underestimates the need for employment land in East Devon and the sub-region. Those representations also demonstrated the case in favour of expanding successful existing employment destinations as opposed to identifying entirely new sites for employment, including those either within or adjacent to settlement boundaries or as part of housing allocations. Our representations further noted that the focus on high value employment development in the Enterprise Zone will not address the clear need for affordable employment space, which is provided at Greendale Business Park and can be expanded subject to the allocation of the site.
- 1.6 Please refer to our earlier representations for further information and evidence in favour of the allocation of Wood\_38 for employment development to support the expansion of Greendale Business Park.

### **This Representation**

- 1.7 This representation critically assesses the Wood\_38 site against EDDC's sustainability appraisal methodology (which has informed the questions for this consultation exercise) and contrasts our assessment against the recently published assessment undertaken by EDDC. EDDC's assessment of the site has resulted in their recommendation that the site should not be allocated within the emerging East Devon Local Plan.
- 1.8 It is recommended that EDDC review its assessment of Wood\_38 and reconsider the allocation of the site for employment uses. Currently, the overall shortfall in deliverable employment land supply and the inclusion of other proposed employment allocations, in our view, render the emerging Local Plan unsound; the proposed expansion of Greendale Business Park would assist in addressing these concerns and securing a positively prepared, justified and effective Local Plan which is consistent with national policy.

## **Background to Greendale Business Park**

- 1.9 FWS Carter and Sons have owned and operated the thriving Greendale Business Park for many years. During this time it has grown into a significant contributor to the East Devon economy, employing over 2,000 people and generating over £2.5m of annual business rates revenue for EDDC.
- 1.10 A diverse range of companies occupy the business park, from national and international companies and organisations including FedEx, Royal Mail, Viridor and the NHS, to local start-ups including the award winning Powder Keg Brewery.
- 1.11 Despite the challenging economic climate there are no vacancies within the Business Park. To the contrary, there is a substantial, up-to-date register of interests from businesses keen to locate to the Business Park. In our previous representations of October 2022 the register of interests comprised a wide range of businesses with a requirement for a total of 392,000 sq ft which would require circa 4-5 hectares of employment land. In just the six months between January and June 2024, Greendale has received dozens of enquiries with a requirement for 337,000 sq ft of floorspace. Over 3 hectares of land would be required to satisfy these enquiries alone. Despite the poor growth of the national economy, this clearly demonstrates that demand for employment land is still very high in East Devon and at Greendale in particular, and that this demand is not being satisfied by the currently allocated employment sites. Further employment land must also be allocated to support the expansion of existing businesses and enable future enquiries to be satisfied.
- 1.12 Businesses, particularly Small-Medium Enterprises (SMEs), want to operate from the Greendale Business Park because it offers good quality affordable accommodation. Rental levels are considerably lower than other employment locations within the authority area and given the ongoing inflationary pressures and consequential economic challenges facing many businesses, affordable accommodation is crucial to their long-term sustainability.
- 1.13 In addition to accommodation, one of the greatest challenges for businesses, particularly SMEs and start-ups, has been the rising cost of energy. Commercial enterprises do not benefit from the

Government energy price cap and so have been particularly hard hit by the energy crisis following the war in Ukraine. It was noted in our previous representations that many businesses would see their energy costs increase two, three or four fold when fixed price energy contracts were to expire in early 2023. As widely reported in the media, rising energy prices since that time have significantly impacted businesses across the country. This has not been the case at Greendale Business Park – not only does the Greendale Business Park provide affordable accommodation, but it also benefits from its own direct, locally sourced renewable energy. Occupiers have saved money on energy bills in the last year, allowing these businesses to further invest in their productivity and staffing rather than spending money on energy costs.

- 1.14 FWS Carter and Sons have invested significantly in the on-site anaerobic digestion plant which, for the vast majority of time, supplies 100% of the electricity needs of the Business Park. Energy generated by the on-site anaerobic digestion plant has been estimated to save occupiers approximately 20% in energy costs when compared to electricity sourced from the national grid, which is a substantial cost-saving for SME businesses. In a drive to further enhance its sustainability credentials and contribution towards net zero ambitions, it is also in the process of installing a 10,000 sqm photovoltaic array to the rooftops of buildings within the Business Park. Once complete this will generate on average 1 megawatt; sufficient to meet the needs of the expanded Business Park.

### **The Case for Expansion**

- 1.15 The continued success and expression of confidence in the Business Park has been a catalyst for the owners – FWS Carter & Sons Limited – to investigate the potential for further future expansion. As noted in our previous representations, to avoid an ‘ad hoc’ approach to the expansion of the business park, the owners developed a 10-15 year Masterplan and sustainable vision for its future. A systematic and robust analysis of environmental and landscape considerations contributed to this masterplan, which was produced in late 2020. A copy of the masterplan was submitted in support of the HELAA ‘call for sites’ submission which sought the allocation of the site for employment uses.

- 1.16 The implementation of the Masterplan in full would deliver a major boost to the East Devon economy:
- creating an estimated 1,368 new permanent jobs;
  - generating circa £90m Gross Value Added, which represents a 3.5% growth on the GVA in East Devon (2020);
  - delivering an additional £2.3m in business rates, approximately half of which would go to the authority to support local priorities;
  - rebalancing the employment market, diluting the reliance placed upon the service industry and boosting average wages;
  - addressing unemployment; and
  - reducing out-commuting from the authority to employment in Exeter and elsewhere.
- 1.17 We believe that through the environmental-led masterplanning of the Business Park we have demonstrated how these considerable economic benefits can be delivered in a manner which would not have a detrimental impact on the environment.
- 1.18 The masterplan and long-term vision for the Business Park is not solely concerned with mitigating the impact of expansion; it provides an opportunity to take stock of the existing environment and incorporate measures designed to enhance the Business Park as a whole for the benefit of both the current and potential future tenants. These enhancement measures would achieve a net gain in biodiversity, and deliver substantial areas of woodland planting.
- 1.19 Finally, given the importance placed upon climate change by EDDC and the recognised need to support sustainable development opportunities, it should be noted that at present the entire energy demands of the Business Park are provided from 100% renewable electricity generated on-site. There is potential to increase the electricity drawn from the plant to meet the electricity demands of the expansion area and therefore deliver the increased employment through 100%

renewable energy.

- 1.20 For this and other reasons explained throughout these representations, our previous representations and Call for Sites submission in 2021, presentation to members of the Strategic Planning Committee in 2022, and further representations in 2023, we consider the proposed expansion of the Greendale Business Park represents a highly sustainable and sound means of delivering economic growth and new jobs in East Devon. Accordingly the site should be allocated to establish the principle of the expansion of Greendale Business Park which will deliver a significant proportion of the authority's future economic growth needs. The assessment against the Sustainability Appraisal provided in this representation further demonstrates the case in favour of the allocation of Wood\_38.
- 1.21 The assessment by the authority within its 'Employment Site Selection Summary Findings' report is noted. Notwithstanding the many positive merits of the expansion proposed through Greendale Business Park's 2020 Masterplan, in light of the concerns raised by the authority in this consultation exercise, FWS Carter and Sons propose to reduce the scale of the proposed Business Park area to overcome the concerns regarding the potential allocation.
- 1.22 The reduced expansion area (as shown in the updated Masterplan at **Appendix A**) would address the concerns that have been raised by EDDC about the proximity of the gas pipeline, the 'sliver' of land within the area of flood risk, and potential landscape impacts. Indeed, the land above the pipeline has now been removed from the proposed area of allocation, as has the sliver of land that (whilst not proposed for any form of development) falls within the flood risk area. It is this revised area which is now proposed for an allocation for employment development through the emerging Local Plan.

## Site Assessment

### Sustainability Appraisal

- 2.1 At the commencement of this Further Regulation 18 consultation, EDDC published a Sustainability Appraisal Report Addendum which included an assessment of each of the preferred housing and employment sites and ‘reasonable alternatives’ against a set methodology.
- 2.2 Greendale Business Park is identified as site reference Wood\_38 and assessed by EDDC as being a ‘reasonable alternative’ for the following reasons:

*This site is a reasonable alternative as it has been assessed as suitable, available and achievable in the HELAA for employment use. It is located in the western side of East Devon, where the emerging Local Plan spatial strategy focusses new development. It is adjacent to an existing employment use (Greendale Business Park), where the emerging Local Plan supports employment development subject to meeting certain criteria. In addition, it is not already allocated in a ‘made’ Neighbourhood Plan, and does not currently have planning permission.*

- 2.3 Despite the positive commentary above, EDDC concluded that the site should not be identified as an allocation in the draft Local Plan “*due to [its] countryside location with poor access to services and [its] adverse landscape impact.*”
- 2.4 The below table provides an overview of Wood\_38 against EDDC’s sustainability objectives. The first column sets out EDDC’s assessment of the site. The second column sets out our assessment of the updated boundary and masterplan area, using the methodology provided by EDDC within Appendix One of the SA Report Addendum. The following paragraphs demonstrate how these conclusions have been reached. On this basis it is requested that EDDC reconsider their assessment of the site and proceed to allocate the revised Wood\_38 boundary to enable the sustainable expansion of the business park.

Sustainability Objective	EDDC Assessment of 2020 Masterplan Area	Savills Assessment of 2024 Masterplan Area
Biodiversity	0	++
Landscape	-	0
Historic and Built Environment	-	0
Climate Change and Carbon Emissions	-	+
Climate Change Adaptation	0	++
Land Resources	-?	?
Water Resources	-	++
Homes	--	0
Health and Well-Being	+	+
Access to Services	-	++
Jobs and Employment	++	++
Town Centres	-	++
Connectivity and Transport	-	+

## Biodiversity

### EDDC Commentary

2.5 EDDC provide the following commentary on the site against the biodiversity objective:

*“Although within the 10km buffer zone around the Exe Estuary and Pebblebed Heaths European sites, this only requires mitigation for residential development and other developments providing overnight accommodation, so not applicable for these sites. However, the close proximity of the Pebblebed Heaths (1.5km to the south west) to the site means a minor negative effect. Hogsbrook Farm County Wildlife Site located 131m to south, but there is intervening development so not likely to be adversely affected by development.”*

### EDDC Assessment

2.6 The subsequent assessment of the site attributes a ‘0’ score to Wood\_38. The criteria for a 0 score is as follows:

*“Development at the site is not likely to have positive or negative effects on biodiversity.”*

### Savills Assessment

2.7 Savills is of the view that the appropriate score to attribute Wood\_38 is ‘++’, the criteria for which is as follows:

*“Development at the site will deliver biodiversity gains, or improve ecological connections to strategic green infrastructure, or development will address a significant existing sustainability issue relating to biodiversity.”*

### Savills Commentary

2.8 As of February 2024, all planning applications must provide a 10% net gain in biodiversity. Any planning application at the site, following an allocation, would therefore be legally required to

deliver at least a 10% net gain in biodiversity units. The site will therefore deliver biodiversity gains. It is noted that Draft Local Plan Policy 87 proposes to require a biodiversity net gain of at least 20%. On the basis of adherence to legislation alone, the development would therefore a biodiversity net gain, albeit a minor one.

- 2.9 The 2020 Masterplan demonstrated that the site is capable of delivering significant on-site gains in biodiversity. The preparation of the masterplan was informed by a detailed desk-based ecological study and an on-site Phase 1 Habitat Survey which found that the site mainly comprised agricultural (arable) land with low ecology value. The masterplan was subsequently designed with the biodiversity metric in mind, along with the objectives of the Clyst Valley Regional Park (with specific focus on the Grindle Brook corridor). Development areas were concentrated on those parts of the site with low biodiversity value, with surrounding areas providing a net biodiversity gain through habitat creation. New habitat features were proposed, such as meadow grassland, orchards, woodland planting, wetlands, new and enhanced species-rich hedgerows, along with bird/bat/invertebrate boxes within built areas. It would also improve ecological connectivity along the Grindle Brook which is an objective of the Clyst Valley Regional Park Strategy.
- 2.10 The updated Masterplan reduces that amount of land that would be sought for a development allocation. While the area of land sought for allocation has reduced, BNG enhancements can still be provided outside of the allocation areas, and FWS Carter and Sons have committed to providing at least 25% BNG through the development of the site if allocated. This extends beyond the statutory minimum and the draft Local Plan Policy requirement and therefore should be considered a significant positive in this regard.
- 2.11 As recognised by EDDC, the proximity of the site to the Exe Estuary SPA/Ramsar site, the Pebblebed Heaths SPA/SAC/SSSI, and the Hogsbrook Farm County Wildlife Site is noted. It is noted by EDDC that mitigation for negative effects on these sites via financial contribution is only required by proposals that include overnight accommodation. Wood\_38, as an employment site, would not include overnight accommodation, and therefore financial mitigation would not be required from the proposal as there would be no impact.

- 2.12 Turning back to the Sustainability Appraisal, the site, if allocated, would deliver biodiversity gains, improve the quality of the Grindle Brook river corridor connection to the Clyst Valley Regional Park, and reduce agricultural effluents. When assessed against the SA methodology, the ‘++’ score is therefore considered most appropriate for this site.

## Landscape

### EDDC Commentary

- 2.13 EDDC provide the following commentary on the site against the landscape objective:

*Whilst there is some built context with the existing business park to the north, and Hogsbrook Farm buildings to the south, overall the site has a predominantly rural context, and a medium sensitivity to new development.*

### EDDC Assessment

- 2.14 The subsequent assessment of the site attributes a ‘-’ score to Wood\_38. The criteria for a - score is as follows:

*Site has medium sensitivity on landscape/seascape, or is within the setting of a National Landscape, or is located within a landscape that is identified in the East Devon and Blackdown Hills Landscape Character Assessment (2019) as vulnerable to the impacts of development.*

### Savills Assessment

- 2.15 If developed in accordance with the masterplan, our view (as supported by the landscape assessment) is that the appropriate score to attribute Wood\_38 is ‘0’, the criteria for which is as follows:

*Development at the site is not likely to have positive or negative effects on the landscape.*

### Savills Commentary

- 2.16 Greendale Business Park sits at the base of a valley. As a result, visibility of much of the site is limited to locations within the Business Park itself. The site is not subject to any landscape designations in itself, but it is recognised that the site is 1km to the north-west of the East Devon National Landscape ('NL', previously known as an Area of Outstanding Natural Beauty) which is in an elevated position and can allow for some viewing opportunities from the elevated NL.
- 2.17 In developing the Masterplan, landscape sensitivity, and the potential visibility of new development at the Business Park, were assessed using LiDAR land height data and photography. A 'Zone of Theoretical Visibility' assessment was undertaken, to understand the impact of new buildings of varying heights across the business park expansion land. Views from Woodbury Salterton were also considered and assessed. Visibility from key receptors was a determining factor in the masterplanning of the site. In the majority of areas, new buildings of heights around 10m could be accommodated before they would become visible from the NL.
- 2.18 It is recognised that the development of the site would change the local landscape character. To assist with integrating the expanded business park into the local landscape, additional tree planting in the forms of orchards and woodlands are proposed at the perimeter of the masterplan area to provide a natural form of visual mitigation from viewpoints in Woodbury Salterton and the NL. As noted within the masterplan, these interventions would mitigate any perceived negative impacts on the landscape. It is therefore considered that the neutral '0' score in accordance with the SA methodology is appropriate for Wood\_38.

## Historic and Built Environment

### EDDC Commentary

- 2.19 EDDC provide the following commentary on the site against the Historic and Built Environment objective:

*Grade II listed Greendale Barton is located in the centre of the site, on the southern edge*

*of the existing business park. Grade II listed Brooklands Farm is around 30m from edge of site in north west – mature trees obscure views into the site, but potential negative impact upon this asset.*

#### EDDC Assessment

- 2.20 The subsequent assessment of the site attributes a ‘-’ score to Wood\_38. The criteria for a - score is as follows:

*Minor negative effects on a designated heritage asset or an important non-designated heritage asset and/or their setting.*

#### Savills Assessment

- 2.21 Savills is of the view that the appropriate score to attribute Wood\_38 is ‘?’. The criteria for a ‘?’ score is as follows:

*Uncertain until more detailed lower level surveys and assessments have been carried out e.g. on the significance and sensitivity of heritage assets and their setting.*

#### Savills Commentary

- 2.22 As recognised within EDDC’s assessment, the Business Park contains Greendale Barton, a Grade II Listed Building. This building is used as the headquarters of Greendale Group, has been directly associated with the operation of the business park for a number of years and is therefore established within its industrial/commercial setting. The Grade II Listed Higher Greendale Farmhouse sits outside of the proposed Business Park boundary.
- 2.23 The Masterplan was prepared with a high level understanding of the heritage assets within and near the site. At this stage it is not anticipated that the proposed expansion of the business park would cause any physical harm to heritage assets, nor would it impact upon the significance derived from its setting due to the existing context of these buildings.
- 2.24 For the above reasons it is considered appropriate to assign a ‘?’ score, on the expectation that

further assessments may be necessary but positive heritage effects are anticipated.

## Climate Change and Carbon Emissions

### EDDC Commentary

2.25 EDDC provide the following commentary on the site against this objective:

*Rural location, some distance from existing settlements, means that development will increase the need to travel. There is a bus service every two hours to Exeter in one direction, and Exmouth in the other, that travels through the centre of the site, with a bus stop on the junction of Honey Lane and White Cross Road. An hourly bus service runs along the A3052 to the north, but there are no bus stops that are easily accessible for pedestrians from the site. Overall, limited opportunities for sustainable travel.*

### EDDC Assessment

2.26 The subsequent assessment of the site attributes a ‘-’ score to Wood\_38. The criteria for this score is as follows:

*Development at the site is not likely to minimise the need to travel, with limited opportunities for sustainable travel and use of renewable and low carbon energy.*

### Savills Assessment

2.27 Savills is of the view that the appropriate score to attribute Wood\_38 is ‘+’, the criteria for which is as follows:

*Site could minimise greenhouse gas emissions by offering potential to reduce travel, sustainable travel links, and use of renewable and low carbon energy.*

### Savills Commentary

2.28 EDDC’s definition of this sustainability objective is “to minimise greenhouse gas emissions.” The objective is not exclusively related to sustainable travel – at least equal weight should be given to

sites which reduce the need to burn greenhouse gasses (and other pollutants) for energy.

- 2.29 By locating employment growth at an existing business park with a clear demand for expansion, it will make the best use of existing infrastructure. Unlike other proposed allocations, no new major highways or infrastructure (with its associated carbon) would be required to sustainably expand Greendale Business Park.
- 2.30 Greendale Business Park is directly served by the 58/58A bus which operates throughout the day between Exeter Bus Station and Exmouth. For Exeter residents, this service enables employees to arrive at the Business Park on weekdays at 08:38 and leave in the afternoon at 17:15. For Exmouth residents, they may arrive at 08:01 and leave at 16:03, 17:51 or 18:19 (or use an earlier service). Further, a more frequent half-hourly service 9/9A runs between Exeter and Honiton/Seaton which serves stops at the entrance to Greendale Business Park on Sidmouth Road (A3052). Employees that live in Woodbury Salterton are approximately 800m from the centre of the business park. This is considered an acceptable distance for walking and cycling, as set out within guidance produced by the Chartered Institute of Highways and Transportation. Greendale Business Park has clear access to sustainable travel links.
- 2.31 The above is a summary of the present situation. There are, however, further opportunities to enhance the accessibility of the site as part of its expansion. Opportunities include:
- The introduction of electric vehicle charging facilities, powered by locally generated renewable energy to support travel by electric vehicles. As confirmed by the UK Government on 28 September 2023 alongside its Zero Emission Vehicle Mandate, “*the switch to zero emission cars and vans will be the single biggest carbon saving measure in the UK’s journey to net zero*”<sup>1</sup>.
  - Enhanced bus transport and travel planning measures to encourage sustainable patterns of movement;
  - The provision of a pedestrian footpath to connect to the bus stop of the A3052.

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<sup>1</sup> <https://www.gov.uk/government/news/government-sets-out-path-to-zero-emission-vehicles-by-2035>

- 2.32 It is also important to note that there will in the future be a significant increase in the number of potential employees residing within active travel distance of the Greendale Business Park. The draft East Devon Local Plan currently intends to allocate land for a major new settlement in the west end of the district, immediately to the north of the Business Park. EDDC anticipate that the new town would deliver around 2,500 new homes over the plan period up to 2040, with an additional 5,500 new homes after 2040. Three options for the location of this new town have been assessed by EDDC. Option 1 is located to the immediate north of the Greendale Farm Shop, and 350m west of the entrance to the Greendale Business Park. Option 2 comprises a large amount of land within Greendale's ownership, which includes much of Greendale Business Park. Option 3 is located west of Woodbury Salterton. Whilst the closest extent of Option 3 is approximately 1km from the edge of the Business Park, Honey Lane and Higher Road would provide a direct connection for cyclists between the Option 3 site and the Business Park.
- 2.33 The 8,000 new homes that are anticipated to be delivered at one of the three sites will introduce thousands of potential employees within walking or cycling distance of the business park. The proposed expansion of Greendale Business Park would directly complement and help meet the employment needs of the new town and encourage the use of sustainable modes of travel between the new homes and a wider range of employment opportunities.
- 2.34 It is understood that EDDC's current preferred option is Option 1, which, as noted above, is in close proximity to both the Farm Shop and Business Park. There are good opportunities to enhance connections between Greendale and the Option 1 area and, subject to obtaining the necessary consents, Greendale would deliver a new walking/cycling crossing across the A3052 to enhance the connectivity between the new homes and new and existing businesses at Greendale.
- 2.35 The combination of sustainable transport initiatives within the Business Park, and the forthcoming development of thousands of homes within proximity of the Business Park would support and encourage sustainable patterns of movement for both existing and future employees.
- 2.36 Outside of sustainable travel, it must be recognised that Greendale Business Park is powered by

renewable and sustainable forms of energy. For most of the year, all of the electricity demand from the circa 100 businesses located within the Business Park is provided by renewable energy generated from the on-site anaerobic digestion plant (c.750kW). The plant takes waste product from the dairy farm and combines this with energy crop to feed two electricity turbines, one of which provides a direct supply to the Business Park, whilst the other feeds into the National Grid.

- 2.37 FWS Carter & Sons has aspirations to work with EDDC to change the diet of the anaerobic digestion plant to incorporate food waste collected by the recycling service. This food waste is currently collected from households across the authority area and taken to a central facility on the Greendale Business Park and from there it is transported outside of the authority area. Using the food waste as part of the diet for the anaerobic digestion plant would not only reduce the cost to the Council of disposal out of area but it would eliminate the need for HGV transportation, reducing the associated green house gas emissions. If this change could be realised it will contribute positively to tackling climate change in EDDC.
- 2.38 FWS Carter & Sons is also investing a considerable sum of money adding photovoltaics to the roof space available on the larger buildings at the Business Park to generate an additional c.800kW further green energy. Investigations are also underway into battery storage and the potential installation of such a facility on the site to better balance power generation with demand.
- 2.39 Any expansion of the Business Park would be powered by the on-site anaerobic digestion plant and the roof mounted solar photovoltaics. There is also potential to generate additional electricity through further roof mounted solar panels on the new buildings that would be developed following an allocation.
- 2.40 The expansion of Greendale Business Park will reduce greenhouse gas emissions, both in transport and in energy. For all of the above reasons it is considered that the + score is appropriate for the site.

## Climate Change Adaptation

### EDDC Commentary

2.41 EDDC provide the following commentary on the site against this objective:

*A slither of fluvial and surface flood risk extends into the western part of the site and around the western and eastern fringes.*

### EDDC Assessment

2.42 The subsequent assessment of the site attributes a '-' score to Wood\_38. The criteria for this score is as follows:

*Site is partially located in an area of flood risk or critical drainage area, and development of the site would find it difficult to avoid these constraints. Difficult to mitigate the effects of heat, drought and extreme storms.*

### Savills Assessment

2.43 Savills is of the view that the appropriate score to attribute Wood\_38 is '++', the criteria for which is as follows:

*Site is not located in an area of flood risk from river, sea, or surface water or critical drainage area; and evidence that development at the site offers an opportunity to reduce flood risk. The built and natural environment can likely cope with heat, drought and extreme storms.*

### Savills Commentary

2.44 The red line of the 2020 masterplan area did indeed include a 'sliver' of land at risk of flooding. As demonstrated within the Masterplan, there is no need to locate any development within areas at risk of flooding to achieve the aims of the masterplan. The expansion areas would include sustainable drainage infrastructure to slow the run-off of surface water, which would reduce the

velocity of water running directly into the Grindle Brook better than the current greenfield rate and could reduce potential flood risk impacts downstream.

- 2.45 Data calculated by '4 Earth Intelligence' and presented by the BCC<sup>2</sup> confirms that Greendale Business Park (EX5 1EW) is at the lowest heat hazard level score, being in the lowest 40% of potential heat hazard areas. The higher the level, the more likely it is that the area will experience high temperatures during hot weather when compared with other areas in the neighbourhood. This contrasts with areas such as Marsh Barton in Exeter, Clyst St Mary and Clyst Honiton which are predicted to be at higher heat hazard levels. It is considered that with regard to overheating, Greendale Business Park should be view positively.
- 2.46 There is no justification for a '-' score as attributed by EDDC. It is considered that ++ is the appropriate score for this SA objective.

## Land Resources

### EDDC Commentary

- 2.47 EDDC provide the following commentary on the site against this objective:

*Greenfield site, comprised entirely of grade 3 agricultural land, with uncertainty as to grade 3a or 3b.*

### EDDC Assessment

- 2.48 The subsequent assessment of the site attributes a '-?' score to Wood\_38. The criteria for a '-?' score is as follows:

*The majority of the site is greenfield. The site is partially covered by best and most versatile agricultural land; and/or partially within a mineral consultation area; and/or partially located on contaminated land.*

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<sup>2</sup> <https://www.bbc.co.uk/news/uk-62243280>

The criteria for a '?' score is as follows:

*Uncertain until more detailed lower level surveys and assessments have been carried out e.g. mixed uncertain if Grade 3 agricultural land is not broken down into 'a' and 'b'.*

#### Savills Assessment

2.49 Savills is of the view that the appropriate score to attribute Wood\_38 is '?', the definition of which is above.

#### Savills Commentary

2.50 As confirmed within the Masterplan, the undeveloped parts of the masterplan area are primarily in agricultural use at present. This land is estimated as falling within agricultural land quality grade 3 in the Agricultural Land Classification Map for the South West Region published by Natural England. Detailed agricultural quality surveys have not been undertaken, and therefore it cannot be presently determined whether the land would fall within grade 3a (the lowest tier of 'Best and Most Versatile Agricultural Land) or grade 3b, which is not BMV land. It is considered that a negative score on this basis is not merited.

2.51 With regard to other land resources, Greendale Business Park is neither located within a Mineral Safeguarding Area nor a Mineral Consultation Area.

2.52 It is not currently known whether the areas of expansion are contaminated. However, the end use, being an industrial, warehousing or distribution use, would not be a use considered to be sensitive to the presence of contamination if it were found at the site.

2.53 As a result it is considered that a ? score is appropriate on the basis that more assessments are required, though at present development is not likely to have positive nor negative effects on land resources.

## Water Resources

### EDDC Commentary

2.54 EDDC provide the following commentary on the site against this objective:

*Southern part of site is within a water source protection zone. The Grindle Brook adjacent to the north drains into the Exe Estuary SPA/Ramsar.*

### EDDC Assessment

2.55 The subsequent assessment of the site attributes a '-' score to Wood\_38. The criteria for this score is as follows:

*Developing at the site will mean minor negative effects on water quality and quantity; for example due to its location within a groundwater source protection zone and/or lack of capacity at sewage treatment works.*

### Savills Assessment

2.56 Savills is of the view that the appropriate score to attribute Wood\_38 is '++', the criteria for which is as follows:

*Development at the site will lead to significant positive effects on water resources by using water efficiently and not affecting water quality.*

### Savills Commentary

2.57 A Groundwater Source Protection Zone is located at Hogsbrook Farm on Warkidons Way. The Outer Protection Zone of this SPZ covers an extremely small (less than 500 sqm) area of land within the very south east corner of the updated masterplan area. 7.3 hectares of the SPZ Outer Protection Zone outside of the masterplan area is already built on and used for industrial and agricultural operations.

2.58 The detailed design of the business park in this area can be arranged to ensure that there will be

no introduction of negative effects on water quality or quantity at this SPZ. As noted elsewhere in these representations, the development of agricultural land for alternative uses (which would not utilise nitrates/phosphates which could run into the Grindle Brook), and the inclusion of sustainable drainage features to slow and filtrate the flow of surface water into the Grindle Brook should be considered to have a positive effect on water quality.

2.59 For the above reasons the ++ score is considered justified.

## Homes

### EDDC Commentary

2.60 EDDC provide the following commentary on the site against this objective:

*Proposed for employment uses and will not provide homes, a major negative effect is likely for this objective.*

### EDDC Assessment

2.61 The subsequent assessment of the site attributes a '--' score to Wood\_38. The criteria for a -- score is as follows:

*No housing is proposed as the site is being promoted for employment uses only.*

### Savills Assessment

2.62 The criteria for a '0' score is as follows:

*Neutral effect not considered possible as the site will either provide housing (positive) or not (negative).*

### Savills Commentary

2.63 Savills disagrees with the methodology used to assess this objective. Greendale Business Park is not and has never been promoted as location for housing development, and therefore its

proposed expansion for employment uses would not prevent the delivery of homes in East Devon and it should not be considered negatively on this basis. The expansion of industrial/distribution uses at this site will provide employment opportunities for both existing and new residents in East Devon, supporting the new homes which are proposed within the draft local plan. Overall, it is considered that the site should be considered to have a neutral ('0') effect on this objective.

## Health and Wellbeing

### EDDC Commentary

2.64 EDDC provide the following commentary on the site against this objective:

*A positive effect on well-being in general through the provision of jobs. Within 50% least deprived neighbourhoods, so less potential to alleviate deprivation. Rural location means no significant pollution issues.*

### EDDC Assessment

2.65 The subsequent assessment of the site attributes a '+' score to Wood\_38. The criteria for this score is as follows:

*Will deliver new development in close proximity (800m) to an area of higher deprivation (among 50% most deprived neighbourhoods in England), where there is good air quality and limited noise and light pollution (e.g. away from 'A' road, motorway, railway line, airport, heavy industry). The site is within 1,600m of open space/allotment and a children's play area.*

### Savills Assessment

2.66 Savills do not disagree with the assessed + score for this site. It is unclear, however, why open space, allotments and children's play areas are assessed for sites that would provide employment uses, when such uses are typically provided to support residential development. Nevertheless, as shown within the Masterplan, the expansion of Greendale will include walking trails, cycle routes and picnic/outdoor seating areas for employees and visitors to the business

park which will enhance health and wellbeing. Further, an existing childcare centre is located next to Greendale Farm Shop, supporting social inclusion by providing a close-by facility for working parents to leave children at the centre while working at the Business Park.

## Access to Services

### EDDC Commentary

2.67 EDDC provide the following commentary on the site against this objective:

*Rural location, but there is a bus service every two hours to Exeter in one direction, and Exmouth in the other, with a bus stop on the junction of Honey Lane and White Cross Road. A primary school, community hall, shop, and pub are all within 1km of the site, but these are accessed along country lanes, a poor quality route for pedestrians.*

### EDDC Assessment

2.68 The subsequent assessment of the site attributes a '-' score to Wood\_38. The criteria for this score is as follows:

*Site is more than 800m from a primary school, shop, and community hall; but is within 800m of an hourly bus or train station. Or site is within 1,600m of a primary school, shop, and community hall but there are significant issues relating to safety, quality and/or topography of route for pedestrians/cyclists.*

### Savills Assessment

2.69 Savills is of the view that the appropriate score to attribute Wood\_38 is '++', the criteria for which is as follows:

*Site is within 800m of a wide range of services/facilities (primary school and/or secondary school, shop, GP surgery, pub, library, community hall). No significant issues relating to safety, quality and/or topography of route for pedestrians/cyclists.*

2.70 To note, the objective of 'access to services' is defined by EDDC as the following:

*To provide accessible and attractive services and community facilities for all ages and interests.*

2.71 The 'factors to consider' when reviewing a site against the objective are defined by EDDC include the following:

- *Access to area wide services (nursery and pre-school, primary, secondary, further and higher education; healthcare; etc.).*
- *Community facilities (local shops, meeting venues, public houses, places of worship).*
- *Cultural buildings and facilities (e.g. libraries, museums, cinemas).*
- *Access to high speed broadband.*

#### Savills Commentary

2.72 It is unclear why it would be preferable to locate a generally industrial employment site near schools, community buildings and cultural facilities, and for those reasons it is considered that it is inappropriate to assess the site against such metrics. However, access to high speed broadband is considered a relevant factor for an employment site. Greendale Business Park benefits from super-fast broadband.

2.73 The only service/facility considered to benefit employment uses is a place for employees to buy and eat and food during a lunch break. The Business Park is such a facility and is connected to the Greendale Farm Shop by a footpath.

2.74 It is therefore considered that a ++ score is appropriate for the site based on its existing superfast broadband connection and connectivity to the farm shop.

## **Jobs and Employment**

#### EDDC Commentary

2.75 EDDC provide the following commentary on the site against this objective:

*As the site is proposed for employment use, a major positive effect.*

#### EDDC Assessment

2.76 The subsequent assessment of the site attributes a '++' score to Wood\_38. The criteria for this score is as follows:

*The site is within 800m of an employment site; and has realistic potential to accommodate employment on site (e.g. larger site that has good access, acceptable landscape impact, and acceptable impact on amenity).*

#### Savills Assessment and Commentary

2.77 Savills agree that the appropriate score to attribute Wood\_38 is '++'. If the full masterplan were implemented it would:

- create an estimated 1,368 new permanent jobs;
- generate circa £90m Gross Value Added, which represents a 3.5% growth on the GVA in East Devon (2020);
- deliver an additional £2.3m in business rates, approximately half of which would go to the authority to support local priorities;
- rebalance the employment market, diluting the reliance placed upon the service industry and boosting average wages;
- address unemployment; and
- reduce out-commuting from the authority to employment in Exeter and elsewhere.

2.78 Greendale have assessed the benefits that would be directly associated with the reduced development area as shown in the updated plan. Their analysis identified the following benefits associated with the development of this area:

- Creation of 1,100 jobs, increasing the total number of jobs at Greendale Business Park to over 3,000;
- Increase the Ratable Value of all property at Greendale Business Park to £8,500,000, with rates payable increasing to over £4,300,000 per year to East Devon District Council;
- The immediate delivery of the site to ease the pressure on the identified employment land shortage, due to the single ownership of the land and there being no need for major infrastructure works to facilitate the development;
- Mitigation of potential visual impacts due to the site's location in a valley adjacent to the existing business park, along with 10 acres of tree planting which will also provide screening for neighbouring properties.

## Town Centres

### EDDC Commentary

2.79 EDDC provide the following commentary on the site against this objective:

*Beyond 1,600m of an existing town centre, so development will not support a town centre.*

### EDDC Assessment

2.80 The subsequent assessment of the site attributes a '-' score to Wood\_38. The criteria for this score is as follows:

*Site is beyond 1,600m of an existing town centre.*

### Savills Assessment

2.81 EDDC's definition of this sustainability objective is "To safeguard and strengthen the vitality and viability of town centres". Concerns are therefore raised by the narrow methodology used for assessing this criteria.

- 2.82 Savills is of the view that the appropriate score to attribute Wood\_38 is '++'. While the criteria for which is as follows, the proposal would contribute very positively to the objective noted above.

*Site is located within 800m of an existing town centre.*

#### Savills Commentary

- 2.83 Greendale Business Park hosts a number of industrial, warehousing and distribution businesses which directly support the ongoing viability, servicing, function of town centres in East Devon and in Exeter. For example, DHL and International Distributions Services Plc (Royal Mail, Parcelforce, GLS) provide delivery and courier services which support town centres. Biffa and Suez provide waste management services which ensure that town centres are tidy and attractive to shoppers. Rocks Drinks and Powderkeg Brewery produce beverage products which are then sold in shops on local high streets. If the site were allocated and the expansion of Greendale facilitated, more businesses that support East Devon and Exeter's centres could operator from the business park.
- 2.84 It is therefore regretful that the methodology does not recognise the secondary benefits to town centres that business parks can provide. As the site would safeguard and strengthen the vitality and viability of town centres due to secondary effects, a positive score is considered appropriate.

### **Connectivity and Transport**

#### EDDC Commentary

- 2.85 EDDC provide the following commentary on the site against this objective:

*The A3052 can be accessed 1km to the north, and a two hourly bus service runs past the site. Superfast broadband exists in local post codes. No recognised cycle routes nearby, so overall a minor negative effect.*

#### EDDC Assessment

- 2.86 The subsequent assessment of the site attributes a '-' score to Wood\_38. The criteria for this score is as follows:

*Site is located more than 800m from:*

- *a train station or an hourly or better bus service; and*
- *an 'A' road; and*
- *a recognised cycle route.*

*Site is located in an area with standard broadband (10-30 mbps) or less.*

### Savills Assessment

2.87 Savills is of the view that the appropriate score to attribute Wood\_38 is '+', the criteria for which is as follows:

*Site is located within 1,600m of:*

- *a train station or an hourly or better bus service; or*
- *an 'A' road; or*
- *a recognised cycle route*

*Site is located in an area with standard broadband (10-30 mbps) as a minimum.*

### Savills Commentary

2.88 The main access into Greendale Business Park is directly off the A3052 (Sidmouth Road), and is 200m from the northern boundary of Wood\_38 and 750m from the centre of Wood\_38. EDDC have noted that superfast broadband exists in local post codes. The site therefore immediately satisfies the assessment criteria for a positive assessment.

### **Mitigation**

2.89 Within the mitigation heading, EDDC note the following mitigation measures which may address the likely significant adverse effects and maximise the beneficial effects:

- *Sensitive design and landscaping can help minimise adverse effects on the landscape and historic environment, but likely negative effects are likely to remain upon the landscape given the rural location.*

- *Ensure no deterioration of water quality into the Grindle Brook, adjacent to the north, through the use of sustainable drainage systems.*
- *Consider whether off-road pedestrian/cycle routes can be delivered to access local services.*

2.90 The 2020 Masterplan provides a high-level overview of all mitigation that would be provided to support the expansion of the business park from a landscape, ecology, transport, flood risk and surface water perspective. These designed-in mitigation measures informed the masterplan and would be delivered as part of the expansion of the Business Park if allocated.

2.91 Specifically in relation to the matters identified by EDDC:

- Sensitive design and landscaping can help minimise adverse effects on the landscape and historic environment, but likely negative effects are likely to remain upon the landscape given the rural location.

**Savills Response:** as is the case with all greenfield land, there is a change in the character of that land as a result of development. The areas proposed for development within the Masterplan are however extremely well concealed in the landscape as a consequence of the existing vegetation and topography of the area. There is also an opportunity to introduce further landscaping in order to minimise the impact.

- Ensure no deterioration of water quality into the Grindle Brook, adjacent to the north, through the use of sustainable drainage systems.

**Savills Response:** The proposals for the site incorporate land which would be used for a sustainable drainage system. This would both slow down the surface water run off rate to match greenfield levels and help clean the water as it passes through the treatment train of the SUDS.

- Consider whether off-road pedestrian/cycle routes can be delivered to access local services.

**Savills Response:** The Greendale Farm shop and the adjacent children’s nursery are both directly accessible by footpath from the Business Park and there is therefore good access to appropriate facilities for an employment location. As noted within this submission, further pedestrian/cycle routes and enhancements would be delivered to enhance the connection to the bus stop on the A3052. If EDDC are minded to continue to pursue Option 1 as the location of a new town, a crossing would be provided across the A3052 to enhance the connection between the town and the business park.

2.92 The 2024 Masterplan Addendum confirms the mitigation measures that would be implemented at each of the two plots within the reduced expansion area. It is considered that all potential negative effects can be avoided or mitigated.

## Conclusion

2.93 EDDC’s current strategy is considered to underestimate the need for employment land in East Devon and the sub-region and therefore it is crucial that the draft Local Plan allocates a substantially larger quantity of employment land than the amount currently proposed. Expanding successful existing employment destinations is considered a more deliverable, sustainable and sound process for allocating employment sites to meet this need than EDDC’s current strategy which generally seeks to identify entirely new sites for employment within or adjacent to settlement boundaries or as part of larger housing allocations. Past experience has demonstrated that this approach has failed to deliver the necessary quantum of additional employment.

2.94 In contrast to new and uncertain locations proposed for allocation in the Local Plan, there is a long list of enquiries from local businesses looking for space at the Greendale Business Park. These enquiries cannot currently be satisfied as there are no vacancies (which in itself demonstrates the popularity of the Business Park) and no opportunities for expansion due to the restrictive boundary of the site within the adopted Local Plan. Allocations for employment land at the Greendale Business Park would be delivered and occupied in a very short amount of time, subject to securing the necessary post-allocation consents. This contrasts with EDDC’s current

approach to allocating new employment land, where new strategic infrastructure may need to be funded, approved and delivered first before any employment opportunities are delivered, or allocating small sites which may have no evidence demonstrating that there is any market interest in those particular sites.

- 2.95 Greendale Business Park is a sustainable location for further employment growth. Its location adjacent to EDDC's preferred option for the 8,000-home new town will provide employment in close proximity to new residents and encourage the use of active and sustainable modes of transport. There are also opportunities to enhance public transport accessibility and incorporate sustainable travel infrastructure such as electric car charging points as part of the expansion.
- 2.96 Furthermore, the business park is powered by an on-site anaerobic digestion plant, and photovoltaic panels are being installed on roofs across the Business Park to generate further energy from sustainable sources. The new businesses on site would therefore benefit from locally generated renewable energy from an energy supply which is already in situ.
- 2.97 With housing, there are some households able to afford a house which meets their needs and others who are in need of housing which is available to rent below average market rates. The same is true for employment. Part of the popularity of Greendale Business Park is that it provides (a) more affordable accommodation than other employment locations within East Devon; and (b) the onsite generation of renewable energy which is provided to the units below market levels keeps the cost of business operations lower than elsewhere.
- 2.98 There is absolutely a place for high-value employment development such as Sky Park within the Exeter and East Devon Enterprise Zone, however, these locations will not be suitable for all businesses and will be unaffordable for many. In contrast, Greendale Business Park is able to provide affordable workspace and lower energy costs. This not only benefits established and growing businesses but also encourages the development of new business start-ups in East Devon, contributing to the overarching economic development of the district and region.
- 2.99 In conclusion, it is recommended that EDDC review its assessment of Wood\_38 against the assessment methodology and reconsider the many positive reasons for allocating the site for

employment uses. Through the revisions to the boundary of the Business Park expansion that is now proposed and the explanation given in these representations, we consider the very significant economic benefits of doing so substantially and demonstrably outweigh the harms.

## **Appendix A:**

# **Greendale Business Park Strategic Masterplan Addendum (June 2024)**

Greendale  
BUSINESS PARK

# GREENDALE BUSINESS PARK


Strategic Masterplan Addendum / June 2024



# ADOPTED BUSINESS PARK BOUNDARY

This plan shows the extent of the authorised business uses at Greendale as defined by Policy VP04 (Greendale Business Park) of the East Devon Villages Development Plan Document, adopted 26 July 2018.



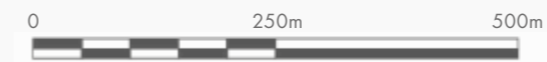
 Extent of the existing business park policy boundary.



# PROPOSED BUSINESS PARK BOUNDARY

This plan shows the proposed extent of the expanded Greendale Business Park, which the Applicant proposes to be the amended boundary of Greendale Business Park within the draft East Devon Local Plan.



EXISTING SITE PLAN



-  Proposed expansions to business park policy boundary.
-  Extent of the existing business park policy boundary.

# MASTERPLAN DEVELOPMENT

## Selection of suitable Areas for future development

Following the outcomes of the Site Capacity Study and the various site opportunities and constraints highlighted in the Masterplan Development document, the following areas suitable for future development were identified.

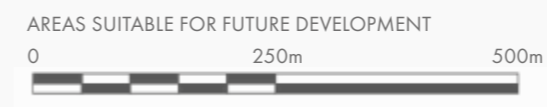
The parcels have been located as a result of the extensive view analysis, consideration of ecological constraints, provision of access to the parcels and quantum of site attenuation required.

The table below provides an approximate area for each parcel.

Land Parcels	Approximate Areas (Ha)
F1	3.28
H	7.06
<b>Total</b>	<b>10.34</b>

The below table provides a summary of the reasoning behind selecting these parcels of land for inclusion in the strategic masterplan.

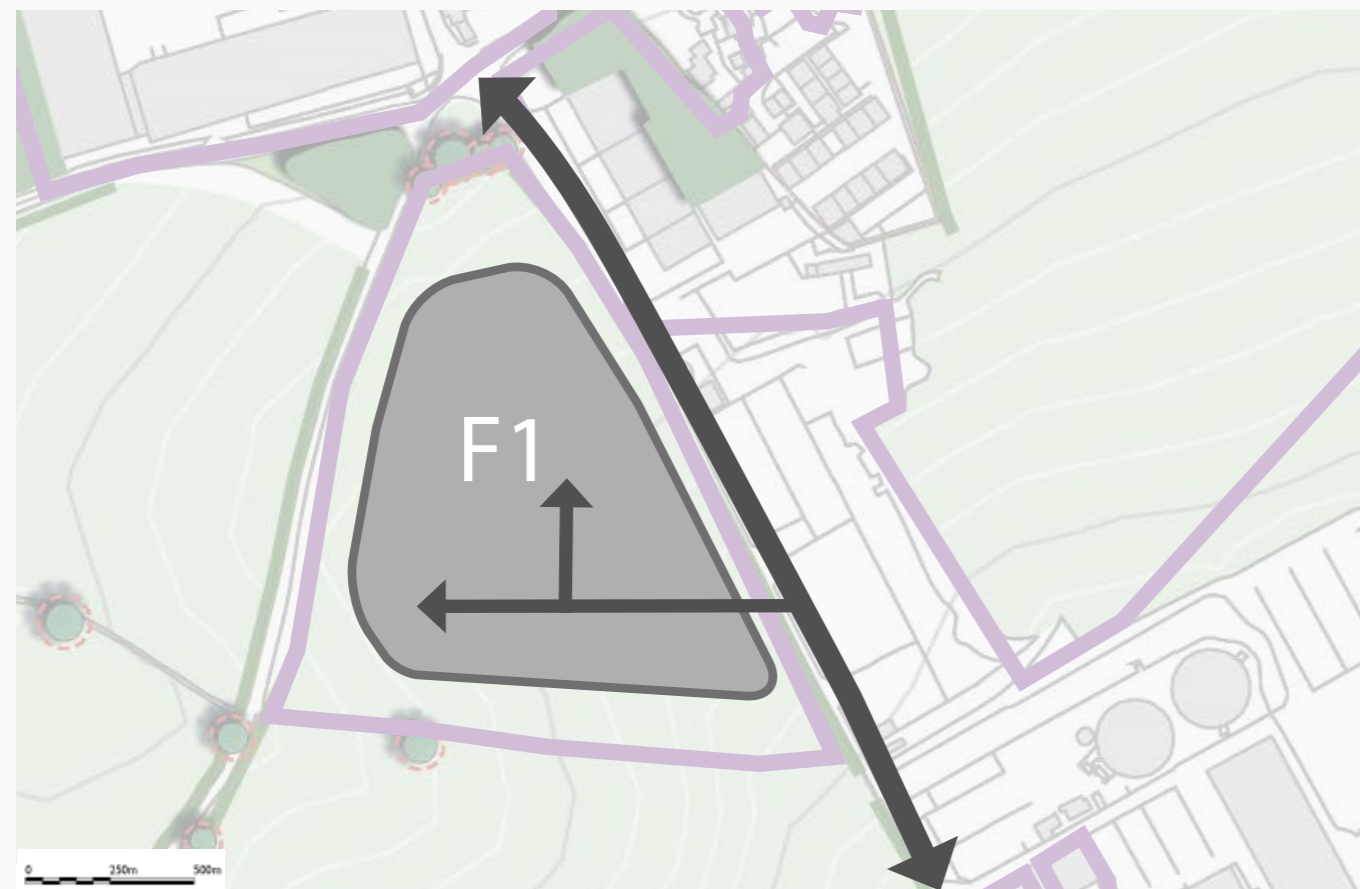
Land Area	Reasoning for Selection
<b>F1</b>	Area F1 is viewed as suitable for future development. An existing hedge row runs along the southern boundary which will need to be considered in future proposals.
<b>H</b>	The majority of Area H is viewed as suitable for future development. An area to the East has been discounted due to its visibility from the AONB, however, will be an opportunity for providing landscape and biodiversity enhancements. This parcel has been designed to avoid any encroachment into a gas pipeline easement area.



- Extent of the new business park policy boundary.
- Area suitable for future development (Limited visibility from AONB).

# INDIVIDUAL PARCEL OPPORTUNITIES

PARCEL F1	
Maximum height of development before becoming visible from AONB	12/14m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Additional tree planting within hedgerows, including oaks, to assist in visual integration of the new development and enhance landscape character. Restoration of east – west hedgerow, to provide further visual integration and reinforce the green infrastructure network.
Attenuation strategy	An attenuation basin will be provided to the West of Parcel F1
Biodiversity Strategy	Existing hedgerows and hedgerow trees retained where possible and buffered to allow long-term management. New Devon hedgerow creation along eastern boundary to increase connectivity. Tree planting to increase canopy cover. Agricultural land compensated for and net gain provided through creation of semi-natural habitats and biodiverse SUDS. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel F1 will be provided from the private road to the East. It is intended for the road to be widened in advance of the parcel being delivered.
Approximate Plot Area (Ha)	5.3
Developable Land Area (Ha) (Indicative)	3.28
Phasing	It is intended for Parcel F1 to be part of the initial parcel to be developed. Some localised widening of the private road will be required for the delivery of this parcel.



PARCEL E DETAIL PLAN

KEY PLAN

## Indicative parcels of land for development

The parcels shown below include an indication of potential developable land. These areas are subject to further study and revision in terms of appropriate landscaping, buffering and site access strategies.

PARCEL H	
Maximum height of development before becoming visible from AONB	12/14m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Woodland planting to south and east of parcel to provide landscape structure and screen parcel in views from the south-east.
Attenuation strategy	An Attenuation basin is provided to the north of Parcel H (previously Parcel I)
Biodiversity Strategy	Existing hedgerows and hedgerow trees retained where possible and buffered to allow long-term management. Tree planting to increase canopy cover and buffer riparian corridor to north-east. Agricultural land compensated for and net gain provided through creation of woodland and other semi-natural habitats. Field to north taken out of agricultural use and used to create biodiverse SUDS/ wetlands adjacent to the Grindle Brook. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel H will be provided from the private road running south from the existing Business Park. It is intended for this road to be widened in advance of this plot being delivered.
Approximate Plot Area (Ha)	9.96
Developable Land Area (Ha) (Indicative)	7.06
Phasing	Similar to Parcel F1 it is intended for Parcel H to be delivered in the short term.



PARCEL F1 DETAIL PLAN

KEY PLAN



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## Appendix B:

### Greendale Business Park Strategic Masterplan (2020)

Greendale  
BUSINESS PARK

# GREENDALE BUSINESS PARK

Strategic Masterplan / December 2020



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Issue	Date	Status	Description	By	Checked	Approved
P07	07/01/2021	S3		DT	JF	JF

# CONSULTANT TEAM



Planning Consultant:  
Savills



Architect:  
AWW Architects and Masterplanners

NICHOLAS PEARSON ASSOCIATES

Landscape Consultant:  
Nicholas Pearson Associates



Transport and Drainage Consultant:  
Stantec



Ecologist:  
Green Ecology



## EXECUTIVE SUMMARY

The Greendale Business Park is home to a large number and range of businesses, providing employment for at least 1,600 people. Through incremental growth over a number of years it has become a major contributor to the East Devon economy and a significant source of Business Rates income for the Council.

Even during the difficult economic climate resulting from the COVID-19 pandemic the Business Park has continued to enjoy 100% occupancy (with the exception of one recent re-letting) and demand for expansion space from existing tenants. There remains a waiting list for space, particularly for compound areas and small to medium size buildings, as well as some larger warehouses.

This continued success and expression of confidence in the Business Park has been a catalyst for the owners – F W S Carter & Sons Limited - to investigate the potential for further future expansion. However, rather than approaching this in an incremental, ad hoc way, the owners have chosen to take stock of the current position and, through a systematic and robust analysis of environmental and landscape considerations in particular, develop a 10-15 year Masterplan and a sustainable vision for the future of the Business Park.

The following sections of this document explain the process which has been followed in developing this Masterplan and how the key sensitivities have been recognised, whilst providing a gross expansion area of approximately 20.5 hectares.

Landscape impact has of course been a particular focus of the assessment and Masterplanning process. Using topographical information in a model which tests the theoretical visibility of the land from key viewpoints, the proposals have been designed to avoid the more sensitive and visible areas, focusing development instead where it can be accommodated in the landform. This process has also helped determine where additional landscaping can be introduced to reduce or eliminate visibility of the Business Park from wider views.

There is also a comprehensive package of environmental improvements proposed, with the creation of new recreation routes and links to the wider

footpath network, the planting of trees and delivering of net biodiversity gain well in excess of the targets set by Government. The majority of these enhancements have also been designed to reflect the recent Clyst Valley Regional Park Masterplan proposals, which seek to preserve the riparian wildlife corridors along the Grindle Brook, to enhance the flood protection around this important catchment and to improve its water quality. F W S Carter & Sons Limited fully support the objectives set out in the draft proposals and this is reflected in our new vision for expansion.

The landscape and environmental analysis has also been combined with an assessment of heritage assets, flood risk, drainage and highways, to form a clear understanding of the site and its surroundings. A comprehensive package of proposals has been made as a result, including highways improvements around the intersection between the private access roads and public highway network and a series of attenuation ponds to deal with surface water discharges.

The final two sections of the document outline the ambitions of the landowners to continue to deliver the vast majority of the energy needs of the expanded Business Park through on-site renewable energy generation and the substantial economic benefits resulting from the proposed expansion of the Business Park, including the creation of approximately 1,368 new jobs, adding an estimated £90M to GVA and contributing around £2.3M per annum to the Council through additional Business Rates revenue.

It is by no means envisaged that the development proposals in the Masterplan would be delivered all at the same time. This is a long term plan and the main purpose of this document is to demonstrate how the proposed expansion of the Business Park could fit into East Devon's wider strategy for economic growth, whilst also preserving and enhancing the biodiversity surrounding the Grindle Brook and mitigating any potential landscape impact from key surrounding areas.



## INTRODUCTION

Greendale Business Park is a strategically important employment site within East Devon. It is home to a range of businesses, from small-scale operators to large national firms such as FedEx, Royal Mail, DHL and Kier Construction. Across the circa 27 hectare site there are at least 1,600 employees with the combined business' contributing a seven figure sum directly to East Devon District Council through Business Rates. In all respects it is a major contributor to the economy of East Devon.

The Business Park has grown organically for over a decade. There has been no over-arching masterplan or vision for its long-term future until now, which carefully considers all of the potential opportunities and constraints of any proposed development and provides mitigation measures to account for any potential constraints. Therefore, it is quite understandable that local residents may have become concerned about the impact of individual applications, when there has been less of a clear understanding of the overall vision for the future of the Business Park.

This landscape and environmental led Masterplan has been produced in order to address these concerns and to put in place a long-term strategy for future growth. The starting point has been a detailed understanding of the landscape and potential visual impact of development. This evidence base has been used to establish where there are opportunities for the phased expansion of employment uses and the potential form of that expansion. In that way the uses and their potential impacts reflect the landscape sensitivity and have been phased in accordance with the effects of the landscape mitigation.

High level technical assessment has been provided for each of the potential expansion areas to show how these could be developed. This includes the strategic landscaping, ecological enhancement proposals, indicative access arrangements and the likely drainage requirements. These are only indicative but provide a helpful understanding of the way in which each phase could be delivered.

Another major focus of the Masterplan is the enhancement of the existing Business Park. As it has grown, increasing numbers of employers and employees have move to the Park but the central facilities for businesses and communal facilities for employees have not kept pace with the expansion. The Masterplan seeks to address this both retrospectively and with a view to the future expansion. It also reviews the condition of the Business Park and proposes environmental enhancements which could be undertaken on a phased basis to improve the conditions for employees working within the Park.

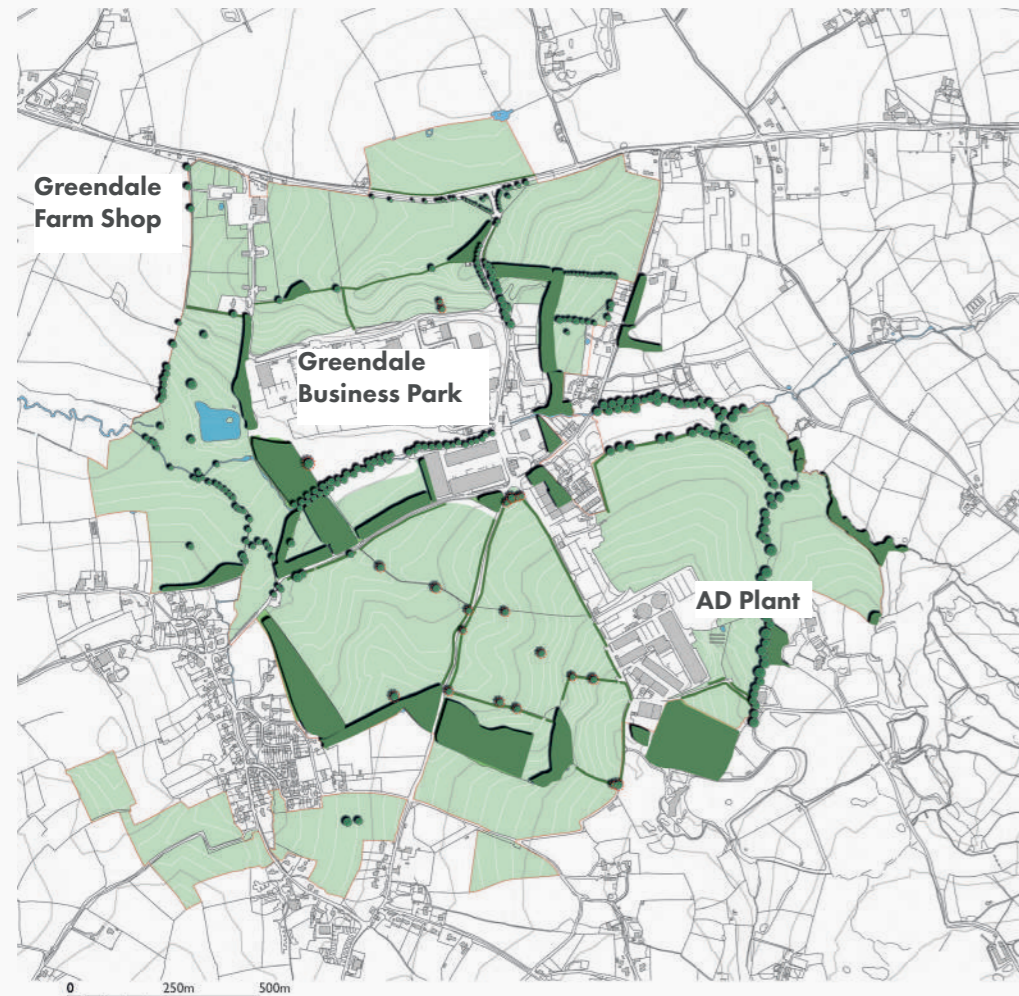


# LOCATION

Greendale Business Park enjoys a strategic location, just 3.5 miles from junction 30 of the M5 motorway on the A3052 Exeter to Sidmouth road. The A30 dual carriageway is 5 miles to the north-west of the Park, and Exeter International Airport is 3.5 miles to the north. Exeter city centre lies 7 miles to the west.

Location	Approximate Travel time from Greendale Business Park by car
M5 Jct 30	8 Minutes
Exeter Airport	8 Minutes
Exmouth	17 minutes
Sidmouth	20 Minutes
Honiton	20 Minutes
Exeter	21 Minutes

Although the Business Park is conveniently sited for access to the busy hub of Exeter, its more rural setting, away from the city's busier roads and the natural topography of the surrounding hillside result in a unique setting for a Business Park. Sunken into the landscape, the park is surrounded by the East Devon Countryside.

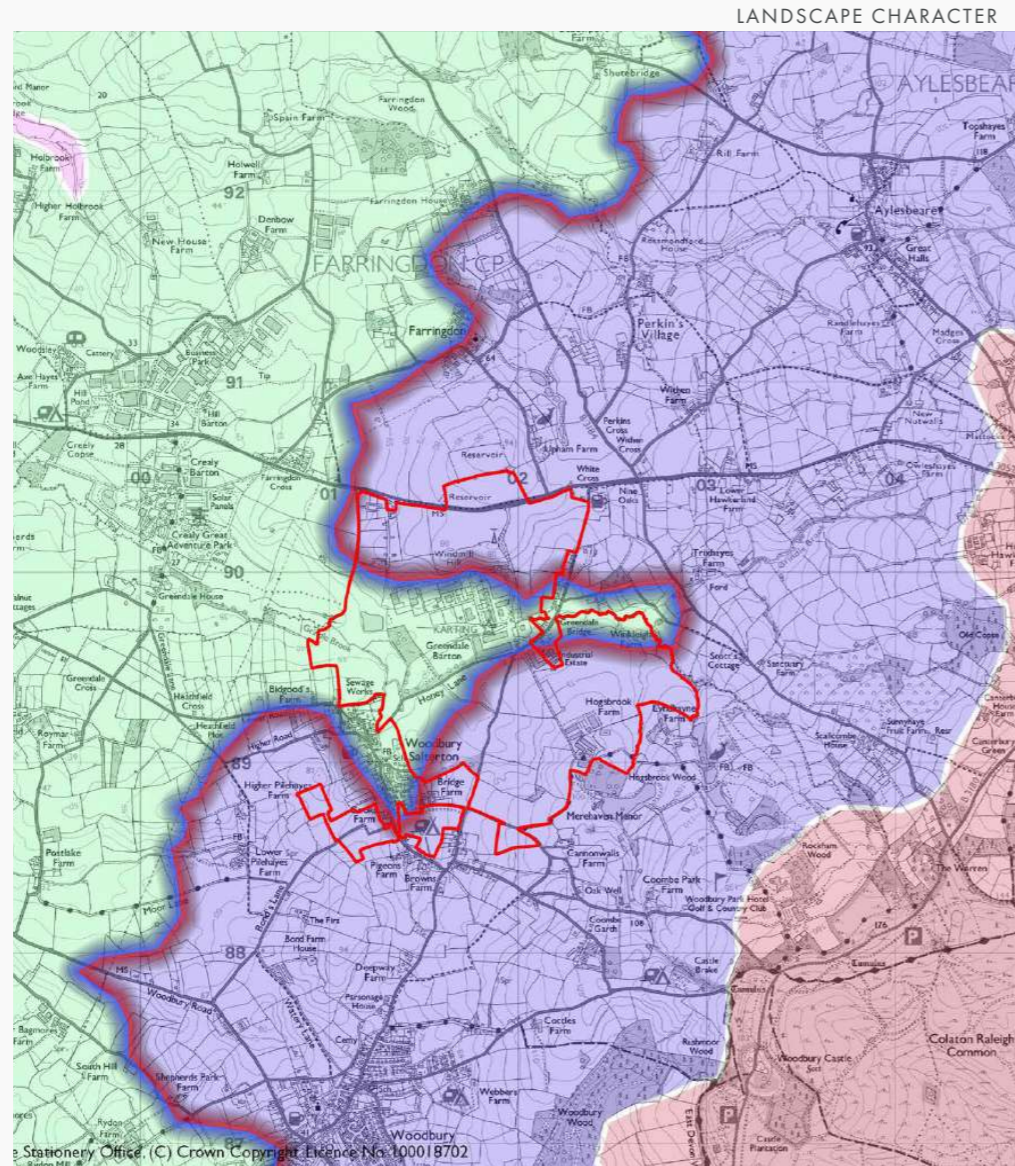


SITE LOCATION



SITE LOCATION IN CONTEXT OF SOUTH DEVON

- Key**
- Site location
  - Devon Landscape Character Areas**
    - Clyst Lowland Farmlands
    - Exe Estuary and Farmlands
    - Pebble Bed Heaths and Farmland
  - East Devon Landscape Character Types**
    - Estuaries
    - Lower rolling farmed and settled valley slopes
    - Lowland plains
    - Main cities and towns
    - Marine levels and coastal plains
    - Pebbled heaths
    - Sparsely settled farmed valley floors



# BASELINE CONDITIONS

## 3.1 Landscape and Visual Appraisal

To establish the environmental and landscape baseline a detailed understanding of the landscape and potential visual impact of development was required.

A preliminary Landscape and Visual Appraisal (LVA) was undertaken by Nicholas Pearson Associates to provide a baseline and strategic overview of existing landscape character and visibility of the Site from the surrounding area.

The preliminary LVA was undertaken in accordance with guidance provided in the Institute of Environmental Management and Assessment and Landscape Institute (LI/IEMA) document, 'Guidelines for Landscape and Visual Impact Assessment' (LI/IEMA, 3rd edition 2013).

The Site is strongly influenced by topography, situated within a valley containing the Grindle Brook, with land sloping steeply to the north to Windmill Hill, and to the south-east to locally elevated land in the vicinity of Hogsbrook Farm.

Within the Site boundary there is a Listed Building – Greendale Barton (Grade II). There are no other landscape or heritage designations within the Site itself.

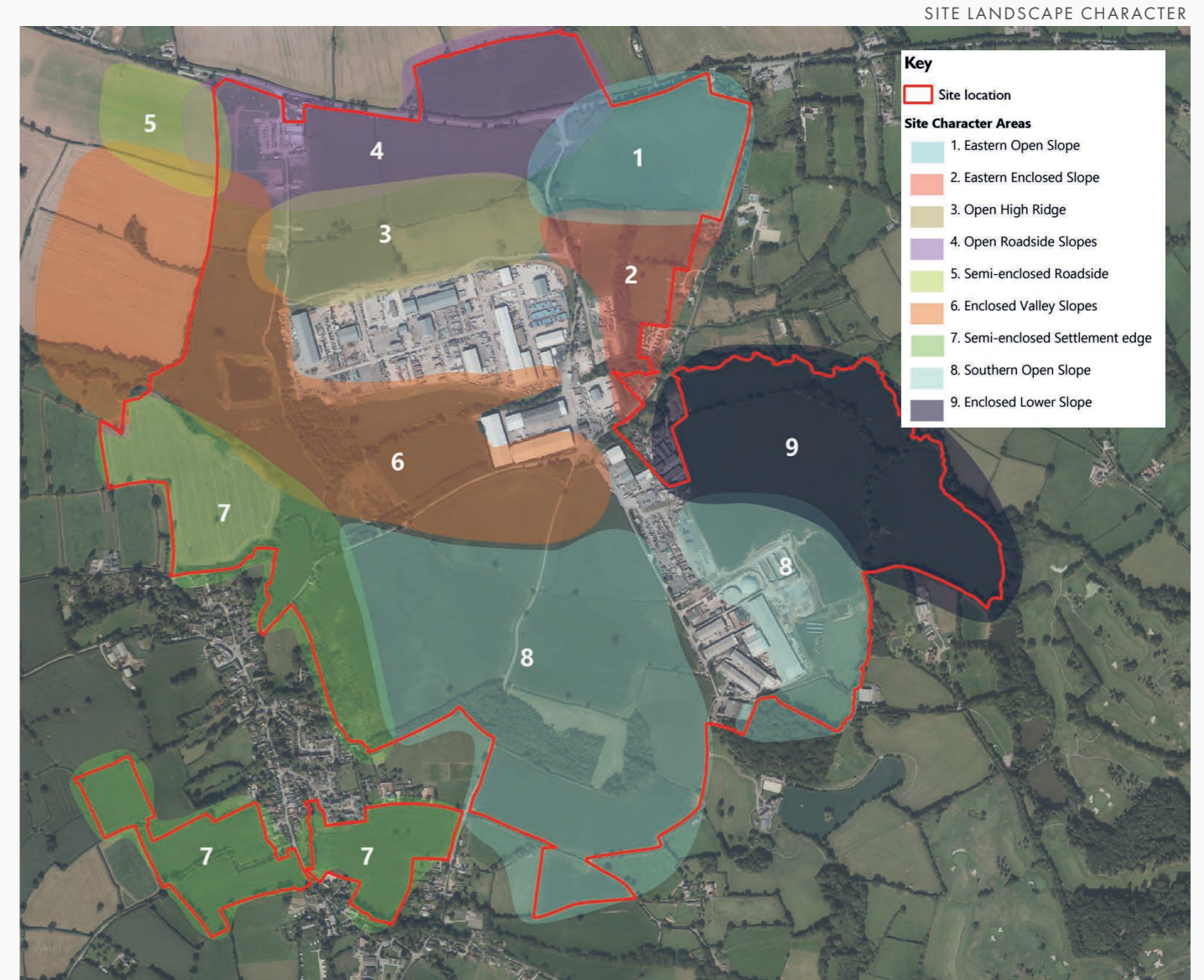
The East Devon Area of Outstanding Natural Beauty (AONB) is located approximately 1km to the south-east of the Site, at the nearest point.

The site sits across the boundary of two Devon Landscape Character Areas (LCA). Broadly, the western and central parts of

the Site fall within the Clyst Lowland Farmlands LCA.

The northern and south-eastern parts of the site, which are more elevated, fall within the Pebble Bed Heaths and Farmland LCA. The sensitivity of these two LCAs to development within the Site are judged to be low-medium and medium-high, respectively.

Nine different Site Character Areas (SCA) have been identified through this study. The overall sensitivity of each of these areas has been determined: one SCA is of low sensitivity (Area 5 outside the site), three SCA are of medium sensitivity (Areas 4, 6 and 8), four SCA are of medium-high (Areas 1, 2, 7 and 9) sensitivity and one is of high sensitivity (Area 3).

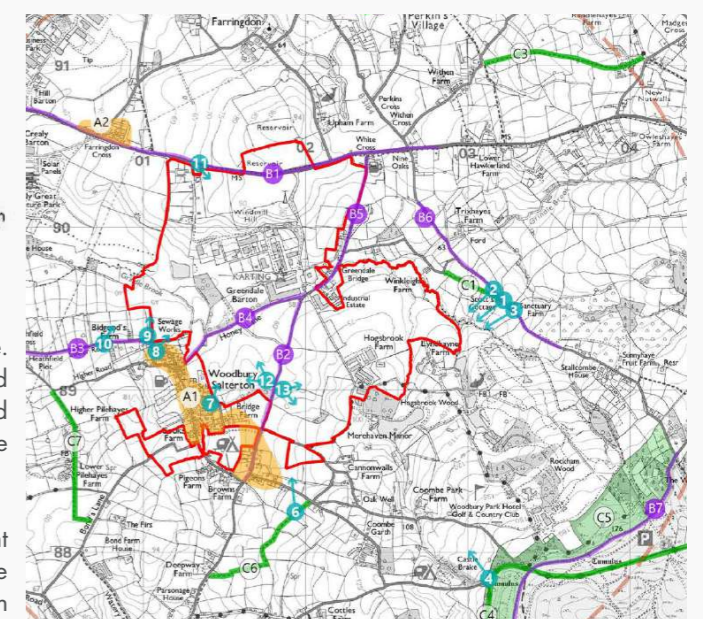


Visibility of the Site from the surrounding area is generally limited due to topography and intervening hedgerows, tree belts and woodlands.

The study has identified visual receptors who have potential to experience visual effects due to development of the Site, and considered their sensitivity to change. These include residents within the village of Woodbury Salterton and users of local roads and public rights of way, including some located within the north-western edge of the East Devon AONB and along the East Devon Way long distance path.

Landscape opportunities and constraints on any development have been identified at a strategic level, as key initial points to be considered in planning the future of the business park, and to assist in the development of a landscape-led masterplan.

- Key**
- Site location
  - A1 Local residents
  - B2 Local road users
  - C5 Users of public rights of way and open access land
  - 1 Representative viewpoint location



VISUAL RECEPTOR GROUPS AND RESPECTIVE VIEWPOINT LOCATIONS



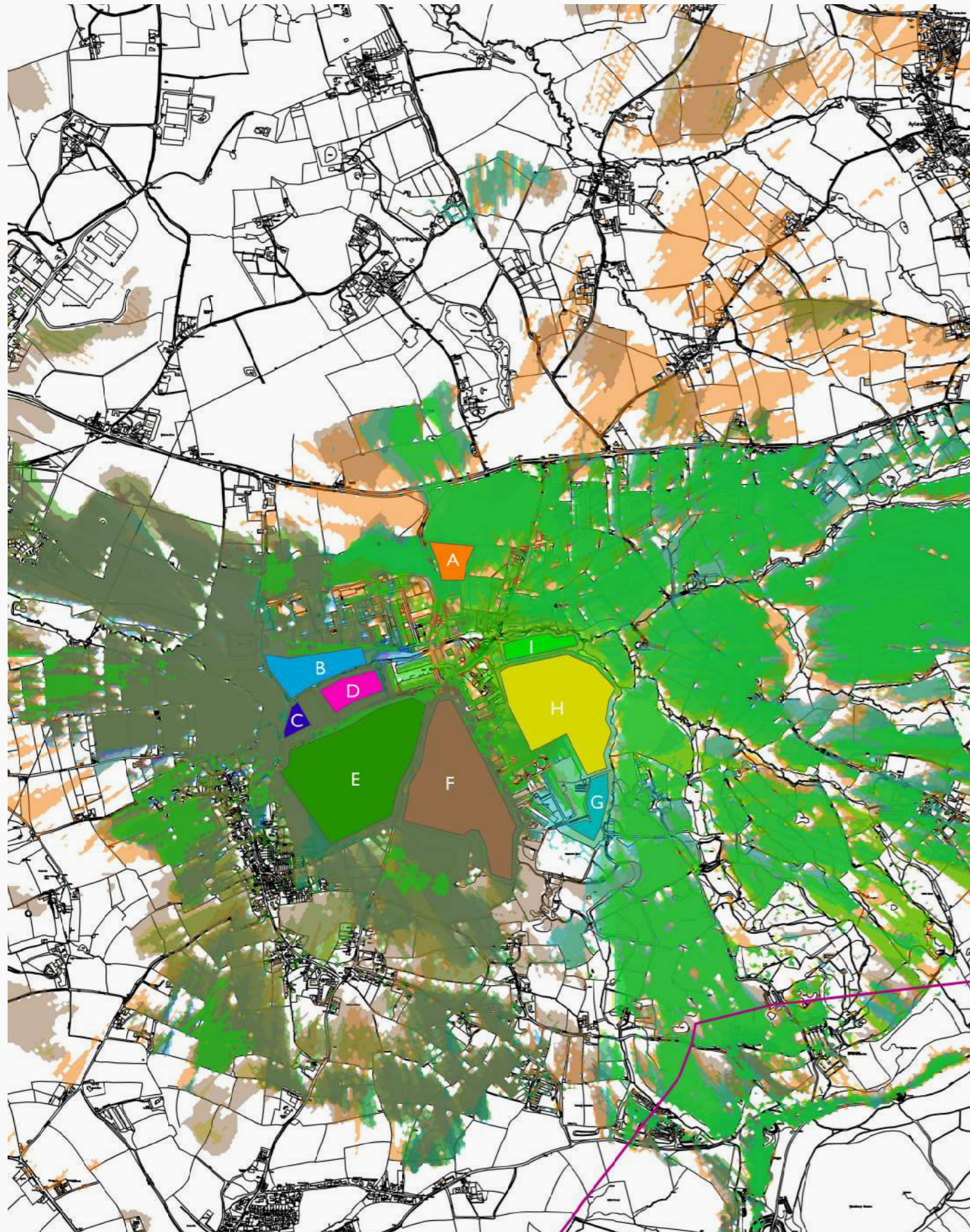
VIEWPOINT 10: View for Lower Road, looking North to North East towards Greendale Business Park



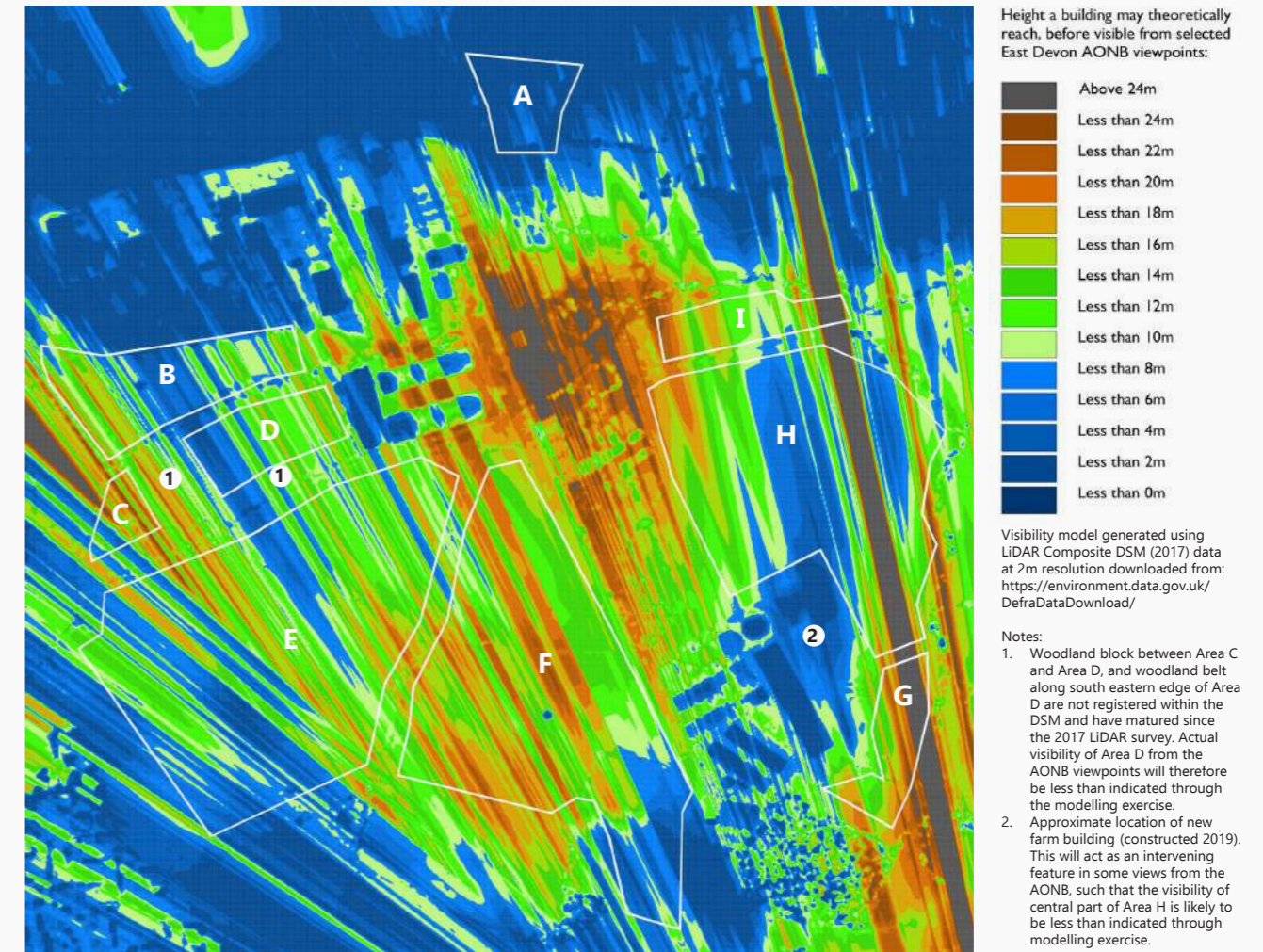
VIEWPOINT 5: Woodbury Common at Western edge of Woodbury Castle car park, looking North



VIEWPOINT 7: Stony Lane adjacent to Woodbury Salterton allotments, looking North-East



ZONES OF THEORETICAL VISIBILITY USING DSM - ALL AREAS OVERLAID. 10M HEIGHT



VISUAL CONSTRAINTS TESTING FROM AONB VIEWPOINTS

### 3.2 Landscape Capacity Study

This Landscape Capacity Study considers the extent to which different areas of the site may be able to accommodate new development whilst considering the potential for adverse landscape and visual effects.

Nine land areas were identified for consideration. The landscape and visual opportunities and constraints for each of these areas has been appraised.

Key viewpoints were identified during the field survey, from which there is some visibility of parts of the site. These included viewpoints located within the north-western edge of the East Devon AONB. Due to the potential high sensitivity of visual receptors in this location, a further visibility testing exercise was run, using the visual analysis software.

The output is a constraints plan, showing the height to which new development could potentially reach within each area of the site, before it is theoretically visible from any of the AONB viewpoints,

An indication of the landscape capacity of each area is provided through the 'risk of adverse landscape and visual effects' rating. This considers the degree to which development, in particular industrial-type development, within each area, is likely to trigger adverse landscape or visual effects.

Two areas (Areas B and D) are rated as having an overall low-medium risk of adverse landscape and visual effects. This is due to their proximity to the existing business park, being smaller scale parcels, which occupying lower elevations and are generally more enclosed by boundary

vegetation; Four areas (Areas E, F, H and I) are rated as having an overall medium risk of adverse landscape and visual effects. In general, these are the larger land parcels, which are less enclosed by topography and / or boundary vegetation. Advanced woodland planting would assist in increasing future capacity of these areas.

Three areas (Areas A, C and G) are rated as having an overall medium-high risk of adverse landscape and visual effects. These areas are generally more elevated, or more visually separate from the existing business park, such that development may be less readily integrated into the landscape.

**3.3 Ecological Baseline**

This section was informed by a detailed desk-based study and Phase 1 Habitat Survey and seeks to identify where the presence of ecological features will be a material consideration for the LPA when considering future development proposals.

The study area comprises mainly agricultural (arable) land, with fields bound by Devon hedges, mature trees and plantation woodlands. The wooded Grindle Brook passes through the centre of the study area in an east to west direction.

The site is not subject to any nature conservation designations, but is within the 'Zone of Influence' of East Devon Pebblebed Heaths Special Protection Area (SPA), Special Areas of Conservation (SAC) and Site of Special Scientific Interest (SSSI) and the Exe Estuary SPA and Ramsar site. The site also lies within a consultation zone for the European Protected Species great crested newt.

The network of hedgerows and woodlands in particular have potential to support a range of protected and notable species. Detailed ecological surveys would be carried out in line with best practice guidance prior to developing detailed designs for a planning application and comprise:

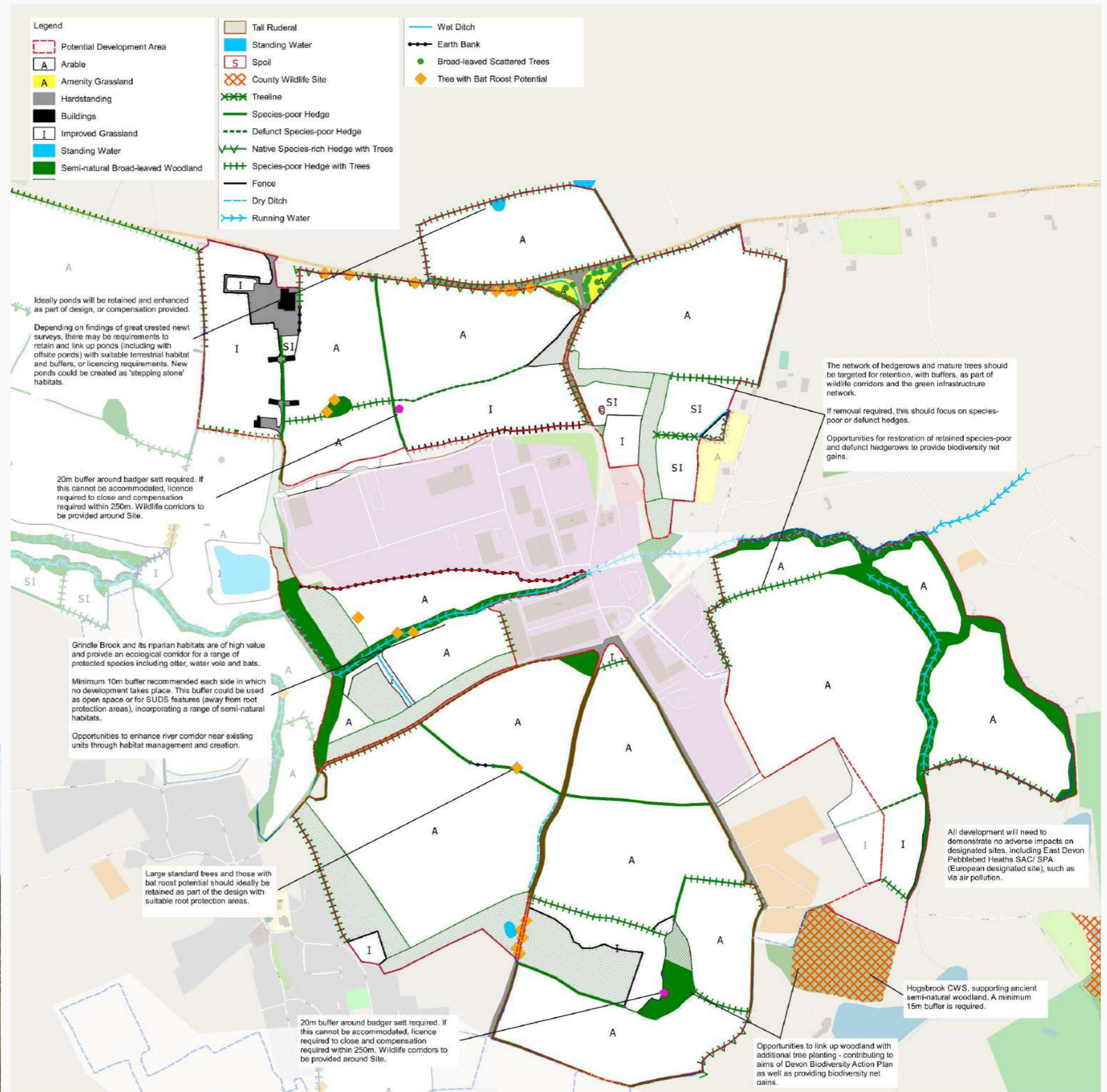
- Bat activity, including checks of tree for roosting potential
- Riparian mammals (otter and water vole)

- Breeding birds
- Dormouse
- Great crested newt
- Badger

Figure 1 shows the survey area and habitat types and identifies initial constraints as well as opportunities to avoid, mitigate and enhance key ecological features.

The overarching ecological objectives for the design will be to:

- Conserve biodiversity in accordance with the mitigation hierarchy (avoid, mitigate, and as a last resort compensate)
- Demonstrate at least 10% net gain for biodiversity through restoration of existing ecological features and creation of new habitats in locations that contribute to enhancing ecological networks
- Retain and buffer hedgerows, trees, ponds and the Grindle Brook, and maintain dark corridors for nocturnal wildlife
- Provide mitigation for potential impacts to nearby designated sites
- Provide a long-term strategy for the sensitive management of habitats and species.



ECOLOGICAL CONSTRAINTS AND OPPORTUNITIES PLAN

**3.4 Transport and Access**

Greendale Business Park is well connected in terms of public transport, with a local bus linking Exeter to Exmouth, via Woodbury Salterton running through the site and a high quality regional service, the 'Jurassic Coaster' running along the A3052, just a short walk away.

The Business Park is also very well placed for access to existing retail and leisure facilities located on the A3052 corridor. There is currently less in way of formal provision for pedestrian and cycle access to the site, however there are a number of existing internal routes including a pedestrian/cycle link with the nearby farm shop.

Primary vehicular access to the existing Business Park is via a private spine road through the site, which forms a ghost island priority junction with the A3052 at its northern end. At its southern end, the spine road intersects the White Cross Road and Honey Lane, at an informal priority arrangement. The private road then continues to the south, providing access to the units currently comprising Higher Greendale.

White Cross Road separates Greendale Business Park and Higher Greendale, linking the White Cross priority junction with the A3052 with the village of Woodbury Salterton to the south. As White Cross Road is a public highway, this forms the priority movement at the Greendale crossroads junction, despite being a country lane and carrying a relatively light traffic flow.

Around 60 meters to the west of the crossroads junction, there is an additional priority junction with a private side road emerging from Greendale Business Park, however this restricted to outbound movements associated with Greendale Office only.

Almost immediately to the south of the crossroads junction, White Cross Road forms a priority junction with Honey Lane which is a further stretch of public highway providing an alternate route to the northern part of Woodbury Salterton to the west.



**3.5 Flood Risk and Surface Water Drainage**

Environment Agency (EA) mapping indicates the majority of the site lies within Flood Zone (FZ) 1 (the Zone with the lowest flood risk). However, some areas associated with the Grindle Brook and minor watercourses/ditches are located within FZ 2 and FZ3. These FZs do not take account of the impacts of climate change.

The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) "Flood Risk and Coastal Change" state that the proposed commercial/industrial development is classified as "Less Vulnerable" and therefore is permitted within FZs 1, 2 and 3a (FZ 3 is further broken down into FZs 3a and 3b, whereby 3b is the "Functional Floodplain"). Any development within FZs 2 and 3a will require flood volume compensation where floodplain storage is lost.

EA mapping indicates that the risk of surface water flooding across the site ranges from "Very Low" to "High", but these areas of higher flood risk generally correspond with the FZs.

Lower lying areas of the site are shown by EA mapping to be at risk of flooding from a reservoir breach, associated with a reservoir located south-east of Hogsbrook Wood. These flood

risk extents closely match the FZs associated with the Grindle Brook. No other sources of flood risk e.g. groundwater, sewers etc. have been identified on site.

Surface water drainage must not increase flood risk on site and downstream. The potential to increase flood risk is generated by the replacement of natural ground with impermeable surfaces. The loss of natural surfaces also removes the processes which removes pollutants from rainfall, which will impact the Grindle Brook catchment as assessed under the Water Framework Directive (WFD). This catchment which was recorded as "Poor" in 2019.

To meet requirements of the NPPF, Devon County Council's Lead Local Flood Authority (LLFA) recommend the use of Sustainable Drainage Systems (SuDS). SuDS aim to mimic natural drainage processes of a site prior to development.

Initially, the means of discharging surface water should be determined based on the drainage hierarchy given in the NPPF PPG, Building Regulations Part H and CIRIA C753 "The SuDS Manual". Based on the underlying geology, topography and existing drainage on site, surface water runoff will be discharged into existing surface water bodies on site (e.g. the Grindle Brook and minor watercourses/ditches).



### 3. BASELINE CONDITIONS

#### 3.6 Opportunities and Constraints

As highlighted in the adjacent plan there are a number of conditions across the site which will require consideration when developing the strategic masterplan. In summary:

##### 1. Site Visibility

Referring to the plan opposite, the areas coloured blue are generally considered more sensitive from a landscape visual perspective and could only accommodate development of less than 8m before such development would become visible from the key viewpoints assessed (e.g. the AONB to the East).

The areas coloured green on the plan are considered to be the less visually sensitive, with the potential to accommodate development of more than 10m+ before such development would become visible from key viewpoints.

However, it should be noted the data used to carry out this visual assessment did not account for the location of a new farm building to the South and Area H, which acts as an intervening feature in some views from the AONB, such that Area H would be less visible than indicated. Furthermore, the established woodland to the South of Area D has matured since the 2017 LiDAR survey and its actual visibility from the AONB is therefore less than indicated through the modeling exercise.

Therefore, the plan illustrates that the majority of the areas identified could accommodate development of more than 10m+ before becoming visible, with the exception of certain key areas. The options for these specific areas has been adjusted to reflect this, as you will see in the following sections.

##### 2. Landscape

There is the opportunity for the retention and enhancement of the existing landscape structure through the planting of new trees, hedgerows and woodland areas, and connecting these areas to create a green infrastructure network. Such a network will help to improve the overall landscape structure and assist in visual integration of any new development.

##### 3. Site Ecology

Where Areas D, I and H border the Grindle Brook a 10m offset for any future development is advised. Large extent of mature hedge have been identified and should be considered within developing access to the parcels. The green infrastructure network may also accommodate elements of sustainable drainage systems and provide opportunity for biodiversity enhancement.

##### 4. Flood Risk and Surface Water Drainage

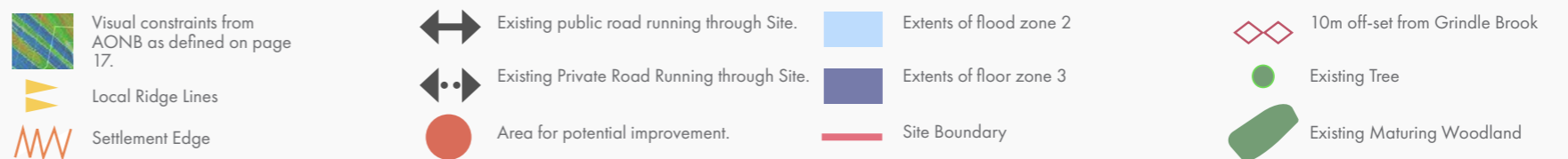
The majority of Area B sits within Flood ones 2 and 3 with Areas D and I partially with in Flood Zone, 2 and 3. Extent of non permeable area to be considered in any future development

##### 5. Transport and Access

The improvement of the existing junction (highlighted in red) should be considered for any future expansion to the business park that would increase traffic in this area.



OPPORTUNITIES AND CONSTRAINTS PLAN



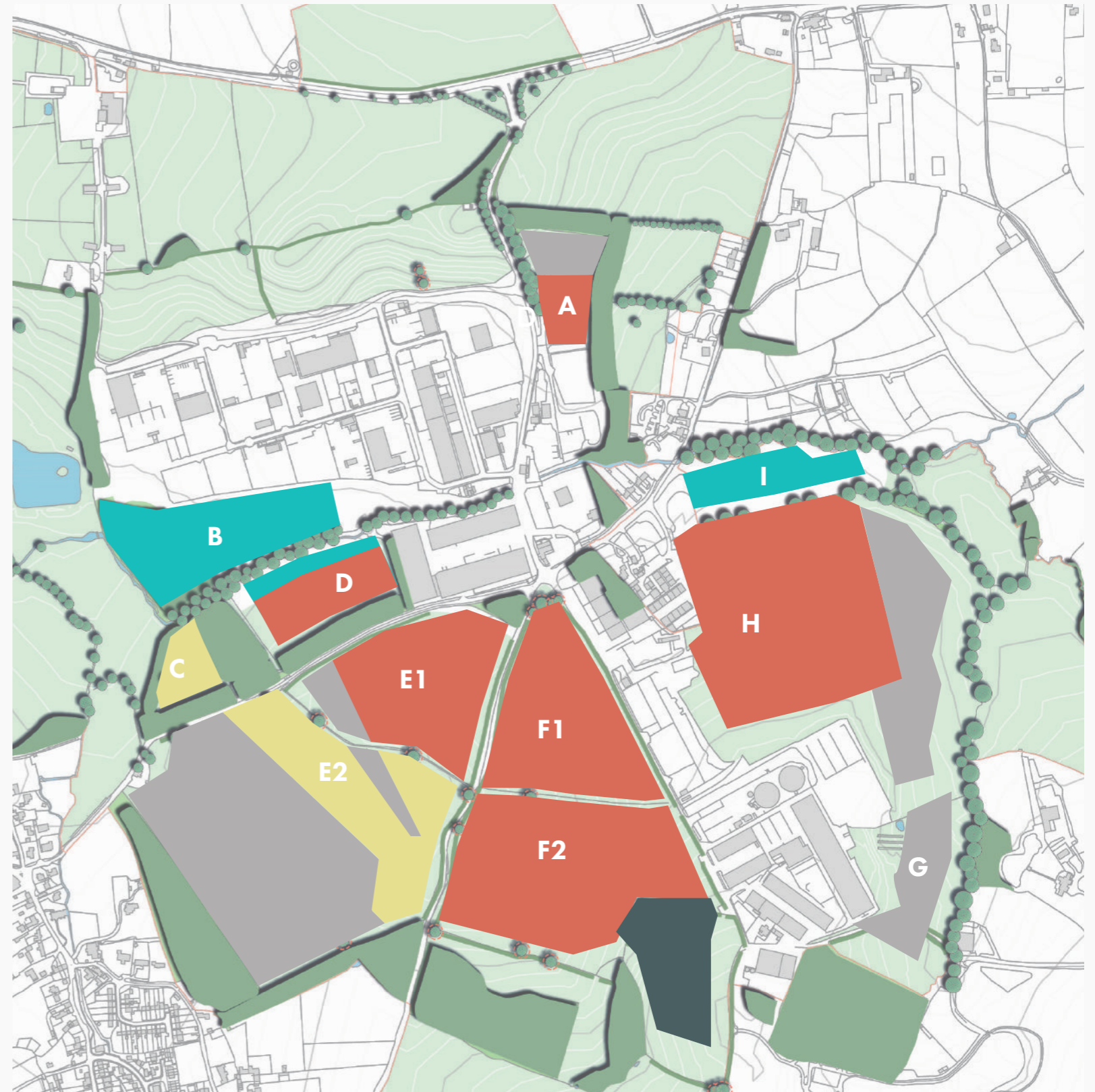
# MASTERPLAN DEVELOPMENT

## 4.1 Selection of suitable Areas for future development

Following the outcomes of the Site Capacity Study and the various site opportunities and constraints highlighted in the previous section, the Areas suitable for future development can be identified.

The below table provides a summary of the reasoning behind both selecting and discounting parcels for inclusion in the strategic masterplan.

Land Area	Reasoning for Selection
<b>A</b>	Parcel A holds a key strategic position within the Business Park due to its views South over the site and being located next to the primary access road it has the potential gateway to the Business Park. A north section of the Area has been discounted for development due to the sloping site, however will be an opportunity for providing landscape and biodiversity enhancements and a low level building.
<b>B</b>	As Area B falls within designated flood zones 2 and 3 it has been deemed to be unsuitable for future development. The location does however provide the opportunity to expand wet meadow habitat and enhance character of the tree-lined stream, in accordance with landscape character guidance, and objectives of the 'Grindle Brook' (GB) project within the Clyst Valley Regional Park Masterplan.
<b>C</b>	Due to Area C's proximity to Woodbury Salterton and challenges with obtaining access to the site via Honey Lane it has been discounted as suitable for future development.
<b>D</b>	Due to the adjacent flood zones and the its proximity to the Grindle Brook the extent of Area D has to be reduced by setting back its Northern boundary. The maturing tree line to the South of Area D provides screening to any future development. Consideration to access will be required due to the limitation of access via Honey Lane.
<b>E</b>	The area to the North of Area E is well suited to future development due to its adjacency to the existing Business Park and low levels of visibility. To the South there are large areas that are to be discounted due to their high visibility from the AONB. The area identified in yellow is also discounted due to its proximity to Woodbury Salterton.
<b>F</b>	The majority of Area F is viewed as suitable for future development, however, the Southern portion has been discounted due to the steeper topography. An existing hedge row runs through the central portion of F which will need to be considered in future proposals.
<b>G</b>	Parcel G has been discounted due to high levels of visibility from the AONB.
<b>H</b>	The majority of Area H is viewed as suitable for future development. An area to the East has been discounted due to its visibility from the AONB, however, will be an opportunity for providing landscape and biodiversity enhancements.
<b>I</b>	Parcel I has been discounted as it is viewed that this area should be prioritised for future landscape and ecological enhancements given its proximity to the Grindle Brook. Its location in relation to Area H means the Area I could provide an area for surface water attenuation for H.



AREAS SUITABLE FOR FUTURE DEVELOPMENT





PROPOSED DRAINAGE PLAN

#### 4.2 Proposed Drainage Strategy

The Masterplan for the site has been developed following “the sequential approach”, avoiding identified flood risk areas. In addition, a SuDS-led surface water drainage strategy will be developed for the site. SuDS will manage surface water runoff to prevent increased flood risk on site and downstream. To achieve this, discharge rates and volumes from the development will not exceed the predevelopment greenfield conditions.

SuDS can also have a wide range of benefits, such as: improving water quality discharged from site, improving amenity spaces and placemaking, enhancing biodiversity (potentially contributing to Biodiversity Net Gain), and contributing to reduce carbon footprint (through reduced embodied carbon in materials used and carbon sequestration where SuDS are vegetated).

For an effective SuDS network, a “management train” should be developed

to mimic natural processes. The management train should form a holistic part of the development proposals. A SuDS Management Train consist of the following elements;

- i. Source Control
- ii. Conveyance
- iii. Site Control

Source Control refers to SuDS that manage rainfall at source, replicating the properties of natural surfaces, making them effective for managing water quantity and water quality. Examples include: permeable paving systems and bioretention (also referred to as rain gardens and includes tree pits). Vegetated bioretention systems provide opportunities for amenity and biodiversity enhancement. Where permeable paving is utilised, it is likely that a macro-pervious structure will be more appropriate given the likelihood for high-traffic loading in an industrial setting.

Conveyance features e.g. swales, ditches and rills, move runoff from one place to another. These measures, being open and often vegetated, will inherently provide more water quality treatment compared to a conventional piped system and can provide an attractive feature alongside cycle/footways and roads or on development plot peripheries.

Site control features provide the strategic-level control for meeting the flood risk objectives for a site by temporarily storing runoff, managing the higher runoff rate from the urbanised site and controlling the outflow to match undeveloped rates. The attached plan indicates initial locations and sizes for site control features which could consist of detention basins (i.e. a dry pond) or ponds/wetlands. It is recommended that ponds/wetlands are utilised nearer the Grindle Brook so that these can compliment, and possibly enhance, the water meadow habitat, contributing to ecological and WFD aims.

## 4. MASTERPLAN DEVELOPMENT

### 4.3 Proposed Access Strategy

In addition to the provision of footways on all new internal roads to facilitate travel by foot across the site, a network of off-road pedestrian/cycle links is also proposed to be provided across the site, including a link to Woodbury Salterton as well a public transport enhancements. These will ensure the site is highly permeable to non-car users and encourage movement into and around the site by these sustainable modes, as well as providing benefit to the community of Woodbury Salterton by formalising existing desire line between the village and the farm shop.

The key aspect of the vehicular access strategy for Higher Greendale involves

the provision of a roundabout to replace the existing crossroads junction. This roundabout would seek to better manage the interaction between public and private highway and would provide a focal point at the heart of Greendale which will play an important place-making role in developing the masterplan.

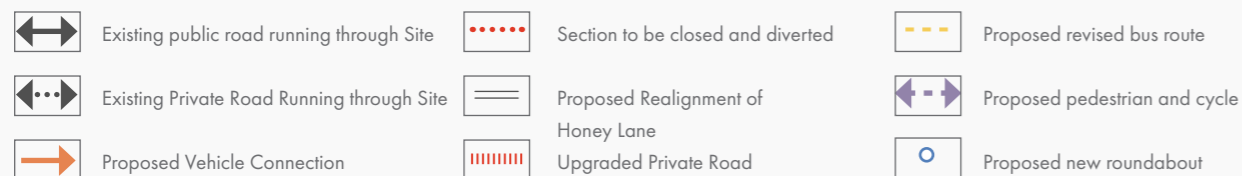
A further change to the existing highway layout would comprise the stopping-up of the additional private access from the Business Park to the east of the crossroads junction and the diversion of the northern most section of Honey Lane is diverted to meet White Cross Road approximately 120 meters to the south at a new and upgraded priority junction. Together, these highway

improvements will reduce the potential for vehicle conflict by simplifying the existing arrangements and ameliorating deficiencies within the existing highway layout.

To the south of roundabout, it is proposed that the existing private spine road through Higher Greendale is retained and upgraded to form the main access route into the various parcels of development. This route can be readily upgraded to accommodate additional HGV traffic and would minimise the impact on the existing areas of ecological sensitivity such as the hedgerows on White Cross Road.



PROPOSED ACCESS PLAN



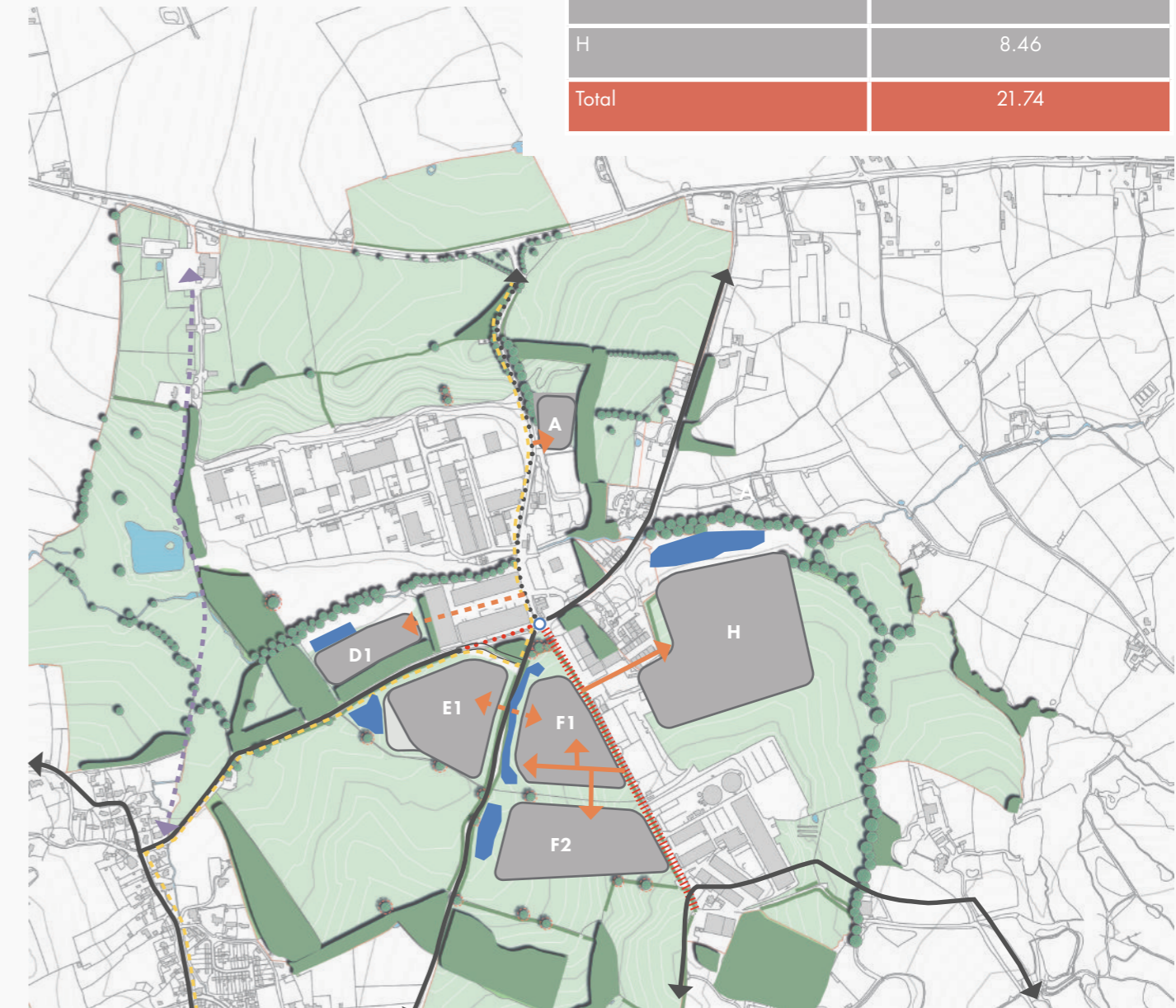
## GREENDALE STRATEGIC MASTERPLAN

### 4.4 Proposed Parcel Plan

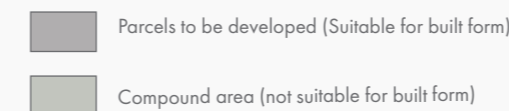
The below plan defines the land parcels that have been identified as suitable for future development. The parcels have been located as a result of the extensive view analysis, consideration of ecological constraints, provision of access to the parcels and quantum of site attenuation required. This diagram will form the basis for the environmental and landscape enhancement proposals for the site.

The adjacent table provides an approximate are for each parcel.

Land Parcels	Approximate Areas (Ha)
A	0.74
D	1.09
E1 (Including compound Area)	3.88
F1	3.28
F2	4.29
H	8.46
<b>Total</b>	<b>21.74</b>



PROPOSED PARCEL PLAN



# LANDSCAPE AND ENVIRONMENTAL ENHANCEMENTS

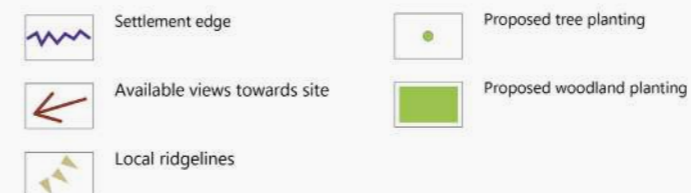
## 5.1 Visual Mitigation Strategy

The locations for the proposed development parcels has been informed by the visual analysis. The following elements also form part of the strategy to reduce and mitigate visual effects (note, location of numbers are identified in the below plan):

1. Additional tree planting within hedgerows, including broad-leaf species, to assist in visual integration of the new development.
2. Orchard / woodland planting to provide additional visual mitigation.
3. Retain existing woodland around development parcel. Building will likely be seen in some local views, sensitive design approach required.
4. Proposed woodland buffer to provide further screening from Woodbury Salterton and Honey Cottage.
5. Tree belts and new hedgerow to screen Parcel H from the southeast.



PROPOSED LANDSCAPE AND ENVIRONMENTS ENHANCEMENTS PLAN





PROPOSED LANDSCAPE CHARACTER ENHANCEMENTS PLAN



PROPOSED RECREATIONAL STRATEGY PLAN



**5.2 Landscape Character Enhancement Strategy**

The strategy to enhance the landscape character of the site, includes (note, location of numbers are identified in the above plan):

- 6. Additional tree planting within hedgerows, including oaks, to enhance landscape character.
- 7. Landscape enhancements to reinforce gateway to Business Park.
- 8. Proposed hedgerow / hedgebank to south of new road section.
- 9. 10m ecological buffer to the Grindle Brook. Opportunity for tree planting and SuDS ponds to improve the corridor for biodiversity and enhance natural flood management.
- 10. Opportunity to expand wet meadow habitat and enhance character of the tree-lined stream, in accordance with landscape character guidance, and objectives of the 'Grindle Brook' (GB) project within the Clyst Valley Regional Park Masterplan.
- 11. Historic mapping indicates this area was formerly an orchard. Opportunity for new planting here to reflect historic land use and to enhance landscape character.
- 12. Landscape enhancements to central part of site in conjunction with junction improvements. (12)
- 13. Landscape improvements to new junction. (13)
- 14. Landscape enhancements to existing business park and central access road, including new trees, and additional planting. (14)



**5.3 Recreational Strategy**

Opportunities to provide additional recreational spaces and trails include (note, location of numbers are identified in the above plan):

- 15. Recreational walking trail set within green corridors, provides links between areas of the business park, the farm shop, viewpoints and seating areas.
- 16. Cycle and walking route between village and farm shop, through area of enhanced landscape with seating.
- 17. Picnic areas with seating, provide spaces for breaks and informal meetings, for business park users.
- 18. Opportunities for new seating areas associated with landscape enhancements within existing business park.

## 5. LANDSCAPE AND ENVIRONMENTAL ENHANCEMENTS



### 5.4 Biodiversity Enhancements

The primary focus of the design was to retain and buffer higher value habitats, such as trees, watercourses and hedgerows to ensure their continued ecological function. Where possible these features will then be enhanced to increase biodiversity value. For example existing defunct or poor hedgerows will be enhanced through sensitive management and infill planting in gaps with the aim of creating species-rich, tall, bushy hedges in good condition.

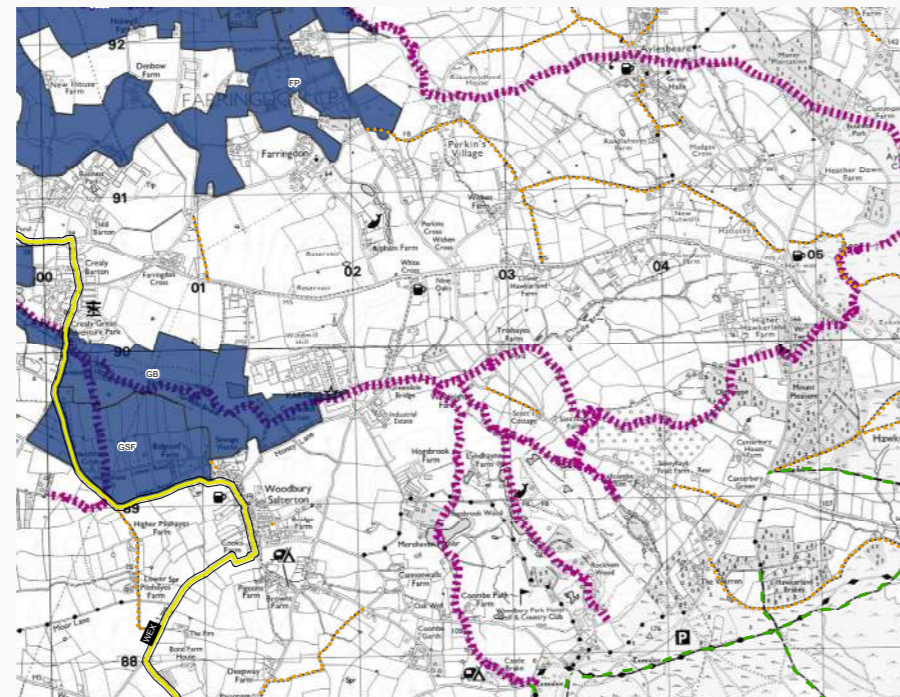
During masterplanning, the Defra biodiversity metric was also used to estimate the habitat required to prevent loss of biodiversity through the removal of low value habitats to facilitate development, such as arable land. This identified that the areas surrounding the development plots, along with the required landscape elements, will be able to deliver a net biodiversity gain through habitat creation such as meadow grassland, orchards, woodland planting and wetland features such as ponds, marshy grassland and reedbeds. New species-rich hedgerows will also be created. These areas will be designed alongside other specialisms, to create multi-functional landscapes, providing flood attenuation, pollination, carbon storage, erosion control and access to greenspace. The built areas will be enhanced with boxes for a range of birds, bats and invertebrates.

Detailed design proposals will focus on:

- Ensuring the mitigation hierarchy is applied appropriately to all phases of development;
- Providing at least 10% biodiversity net gain through habitat creation/ enhancement;
- A phased approach to habitat creation and enhancement to ensure there are no delays between impact and habitat delivery; Increasing canopy cover;
- Meeting objectives of the River Clyst Regional Park, focusing on the Grindle Brook corridor; and, Providing enhancements for any additional species identified during further survey work.



CLYST VALLEY REGIONAL DRAFT MASTERPLAN



EXTRACT FROM CLYST DRAFT REGIONAL MASTERPLAN DETAILED MAP



# MASTERPLAN PROPOSALS

**NOTES**

1. Additional tree planting within hedgerows, including oaks, to assist in visual integration of the new development.
2. Orchard / woodland planting to provide additional visual mitigation.
3. Retain existing woodland around development parcel. Building will likely be seen in some local views, sensitive design approach required.
4. Proposed woodland buffer to provide further screening from Woodbury Salterton and Honey Cottage.
5. Tree belts and new hedgerow to screen Parcel H from the south-east.
6. Additional tree planting within hedgerows, including oaks, to enhance landscape character.
7. Landscape enhancements to reinforce gateway to Business Park.
8. Proposed hedgerow / hedgebank to south of new road section.
9. 10m ecological buffer to the Grindle Brook. Opportunity for tree planting and SuDS ponds to improve the corridor for biodiversity and enhance natural flood management.
10. Opportunity to expand wet meadow habitat and enhance character of the tree-lined stream, in accordance with landscape character guidance, and objectives of the 'Grindle Brook' (GB) project within the Clyst Valley Regional Park Masterplan.
11. Historic mapping indicates this area was formerly an orchard. Opportunity for new planting here to reflect historic land use and to enhance landscape character.
12. Landscape enhancements to central part of site in conjunction with junction improvements.
13. Landscape improvements to new junction.
14. Landscape enhancements to existing business park and central access road, including new trees, and additional planting.
15. Recreational walking trail set within green corridors, provides links between areas of the business park, the farm shop, viewpoints and seating areas.
16. Cycle and walking route between village and farm shop, through area of enhanced landscape with seating.
17. Picnic areas with seating, provide spaces for breaks and informal meetings, for business park users.
18. Opportunities for new seating areas associated with landscape enhancements within existing business park.



PROPOSED STRATEGIC MASTERPLAN 250m 500m

**KEY**

**Landscape structure and features**

- Existing trees retained and protected – indicative root protection areas shown, to be verified by a tree survey
- Existing woodland retained, protected and managed
- Existing hedgerows retained, protected and managed
- Proposed tree planting
- Proposed woodland planting
- Proposed hedgerows / restored hedgerows
- Grindle Brook
- Proposed sustainable drainage (SuDS) features
- Wet meadow habitat

**Recreational features**

- Picnic / outdoor seating areas
- Walking trail
- Cycle route
- Viewpoints

**Landscape and visual considerations**

- Settlement edge
- Available views towards site
- Local ridgelines

# INDIVIDUAL PARCEL OPPORTUNITIES

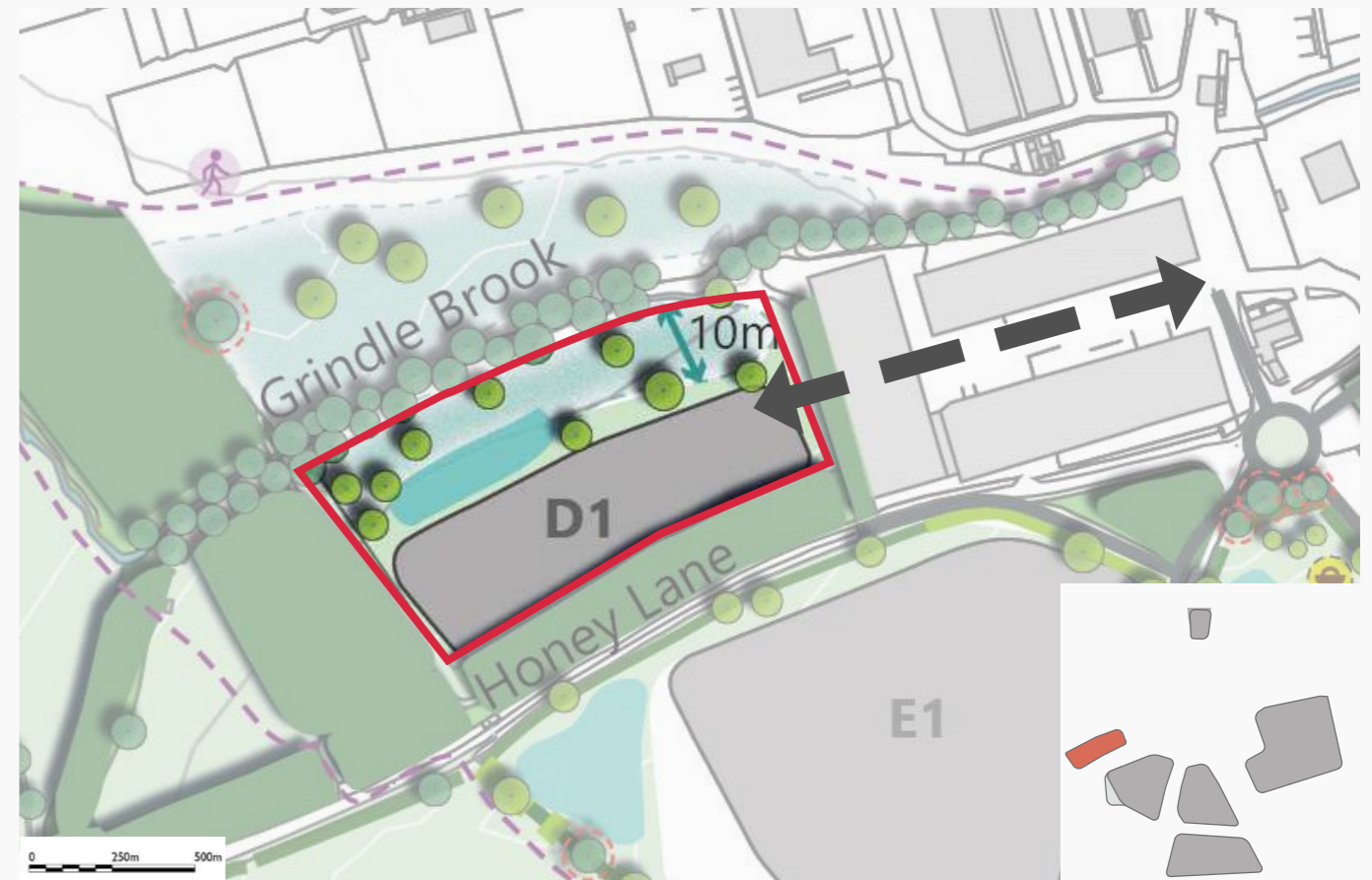
PARCEL A	
Maximum height of development before becoming visible from AONB	Parcel A has been identified as partially visible from the AONB. The design of any new buildings in this location will consider the wider context views from the AONB.
Potential Use Type	B1 use type. Considering the sensitivity of this parcel it is intended to utilise the space for B1 use. The could potentially provide space for relocating the central offices for Greendale Business Park.
Landscape Strategy	Retain existing woodland around development parcel. Additional tree planting to north of parcel to provide wooded backdrop.
Attenuation strategy	An attenuation basin is provided directly South of Parcel A.
Biodiversity Strategy	Existing tree belts to be retained and buffered to protect root zones. Compensation provided for loss of grassland within area of green space which could be enhanced with scattered trees or an orchard. To provide a net gain, surrounding tree belts could be enhanced through sensitive management. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel A will be provided via the private access road to the Business Park.
Plot Area (Ha)	1.8
Developable Land Area (Ha)	0.74
Phasing	The phasing of parcel A is flexible and can come forward at any stage.



PARCEL A DETAIL PLAN

KEY PLAN

PARCEL D	
Maximum height of development before becoming visible from AONB	10m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Opportunity for tree planting and SuDS ponds to provide natural flood management and enhance the character of the tree-lined stream, in accordance with landscape character guidance, and objectives of the 'Grindle Brook' (GB) project within the Clyst Valley Regional Park Masterplan.
Attenuation strategy	An Attenuation basin is provided to the North West of Parcel D
Biodiversity Strategy	Buffer provided alongside Grindle Brook, used for creation of semi-natural habitats and SUDS/ wetland features, reducing existing agricultural run-off and contributing to aims of Clyst Valley Regional Park. Minimum 10m dark zone provided along riparian corridor to protect nocturnal wildlife. Existing tree belts enhanced through sensitive management. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel D will be provided through the existing business park (currently Greendale South Units 1/2).
Plot Area (Ha)	2.08
Developable Land Area (Ha)	1.09
Phasing	As providing access to Parcel D will require a reconfiguration of the existing Business Park, it is envisaged for parcel D to be one of the last parcels to be delivered.



PARCEL D DETAIL PLAN

KEY PLAN

# INDIVIDUAL PARCEL OPPORTUNITIES

PARCEL E1	
Maximum height of development before becoming visible from AONB	12/14m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Additional tree planting within hedgerows, including oaks, to assist in visual integration of the new development and enhance landscape character. Restoration of east – west hedgerow, to provide further visual integration and reinforce the green infrastructure network.
Attenuation strategy	An attenuation basin will be provided to the West of Parcel E.
Biodiversity Strategy	Existing hedgerows and hedgerow trees retained where possible and buffered to allow long-term management. Any losses compensated through new Devon hedgerow creation and enhanced management of existing hedges. Tree planting to increase canopy cover. Agricultural land compensated for and net gain provided through creation of semi-natural habitats and biodiverse SUDS. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel E will be via Parcel F1. Access across Honey Lane will be required.
Plot Area (Ha)	5.62 (including compound area)
Developable Land Area (Ha)	3.88
Phasing	Parcel E will come forward once the strategic landscaping to the South West of the Parcel has matured to the required extent. The delivery of this parcel will follow the completion of Parcel F due to the site access requirements.



PARCEL E1 DETAIL PLAN

KEY PLAN

PARCEL F1	
Maximum height of development before becoming visible from AONB	12/14m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Additional tree planting within hedgerows, including oaks, to assist in visual integration of the new development and enhance landscape character. Restoration of east – west hedgerow, to provide further visual integration and reinforce the green infrastructure network.
Attenuation strategy	An attenuation basin will be provided to the West of Parcel F1
Biodiversity Strategy	Existing hedgerows and hedgerow trees retained where possible and buffered to allow long-term management. New Devon hedgerow creation along eastern boundary to increase connectivity. Tree planting to increase canopy cover. Agricultural land compensated for and net gain provided through creation of semi-natural habitats and biodiverse SUDS. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel F1 will be provided from the private road to the East. It is intended for the road to be widened in advance of the parcel being delivered.
Plot Area (Ha)	5.3
Developable Land Area (Ha)	3.28
Phasing	It is intended for Parcel F1 to be part of the initial parcel to be developed. Some localised widening of the private road will be required for the delivery of this parcel.



PARCEL F1 DETAIL PLAN

KEY PLAN

# INDIVIDUAL PARCEL OPPORTUNITIES

PARCEL F2	
Maximum height of development before becoming visible from AONB	12m/14m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Orchard / woodland planting to south of parcel to provide additional visual mitigation. Additional tree planting within hedgerows, including oaks, to assist in visual integration of the new development and enhance landscape character.
Attenuation strategy	An Attenuation basin is provided to the West of Parcel F2
Biodiversity Strategy	Existing hedgerows and hedgerow trees retained where possible and buffered to allow long-term management. Enhancement of existing hedgerows and new Devon hedgerow creation along eastern boundary to increase connectivity. Tree planting to increase canopy cover particularly where this can join up blocks of existing woodland. Agricultural land compensated for and net gain provided through creation of woodland and other semi-natural habitats. Bat, bird and insect boxes provided on building or trees
Access	Access to Parcel F2 will be via Parcel F1 to the North.
Plot Area (Ha)	8.59
Developable Land Area (Ha)	4.29
Phasing	Parcel F will come forward once the strategic landscaping to the South of the Parcel has matured to the required extent. It will also be after parcel F1 is developed due to the access requirements.



PARCEL F2 DETAIL PLAN

KEY PLAN

PARCEL H	
Maximum height of development before becoming visible from AONB	12/14m
Potential Use Type	B2/B8 Use Type
Landscape Strategy	Woodland planting to south and east of parcel to provide landscape structure and screen parcel in views from the south-east.
Attenuation strategy	An Attenuation basin is provided to the north of Parcel H (previously Parcel I)
Biodiversity Strategy	Existing hedgerows and hedgerow trees retained where possible and buffered to allow long-term management. Tree planting to increase canopy cover and buffer riparian corridor to north-east. Agricultural land compensated for and net gain provided through creation of woodland and other semi-natural habitats. Field to north taken out of agricultural use and used to create biodiverse SUDS/ wetlands adjacent to the Grindle Brook. Bat, bird and insect boxes provided on building or trees.
Access	Access to Parcel H will be provided from the private road running south from the existing Business Park. It is intended for this road to be widened in advance of this plot being delivered.
Plot Area (Ha)	14.55
Developable Land Area (Ha)	8.46
Phasing	Similar to Parcel F1 it is intended for Parcel H to be delivered in the short term.



PARCEL H DETAIL PLAN

KEY PLAN

# ENERGY AND SUSTAINABILITY

Strategy 3 of the adopted East Devon Local Plan provides the over-arching policy context for the achievement of sustainable development. The strategy, which has been replicated in full below, provides a helpful framework within which to explain the sustainability of the proposals.

The objective of ensuring sustainable development is central to our thinking. We interpret sustainable development in East Devon to mean that the following issues and their inter-relationships are taken fully into account when considering development:

- a. Conserving and enhancing the environment - which includes ensuring development is undertaken in a way that minimises harm and enhances biodiversity and the quality and character of the landscape. This includes reducing the risk of flooding by incorporating measures such as sustainable drainage systems. Developers should maximise the proportion of their developments that take place on previously developed land
- b. Prudent natural resource use - which includes minimising fossil fuel use therefore reducing carbon dioxide emissions. It also includes minimising resource consumption, reusing materials and recycling. Renewable energy development will be encouraged
- c. Promoting social wellbeing - which includes providing facilities to meet people's needs such as health care, affordable housing, recreation space and village halls.
- d. Encouraging sustainable economic development - which includes securing jobs.
- e. Taking a long term view of our actions - Ensuring that future generations live in a high quality environment where jobs, facilities, education and training are readily available.

The proposals for the expansion of the Business Park represent an extremely sustainable form of development with social, economic and environmental benefits. In this section we provide a brief explanation of these benefits and how they achieve the five components of Strategy 3.

- a. Conserving and enhancing the environment

The starting point in developing the proposals contained within this masterplan has been a thorough understanding of the existing environment, including the sensitivity of the landscape and location of ecologically important habitats. The next stage of the masterplanning process has been to develop proposals which inherently respond to this detailed baseline understanding, locating development parcels where they would have the least impact upon the existing environment. The objective of minimising harm has therefore been embedded in the process from the outset.

With the harm minimised, the baseline evidence has then been used to establish the most effective means of enhancing the environment as part of the proposed development. To that end, substantial tree planting is proposed along with areas of dedicated biodiversity enhancement; the combination of which has the potential to achieve an overall net biodiversity gain.

Other environmental considerations have also been taken into account in developing the masterplan. For example, preliminary calculations of surface water run-off have fed into a sustainable drainage strategy which will both capture and clean surface water run-off before discharging it at the existing greenfield run-off rates. In all respect, the masterplan proposals seek to first conserve and then enhance the environment.

- b. Prudent natural resource use

The existing units within the Greendale Business Park are currently powered exclusively by renewable energy generated from one of the two turbines within the on-site anaerobic digestion plant. In terms of energy use, the existing Business Park is extremely sustainable and prudent in its use of natural resources.

The landowner are committed to maintaining this principle in the expansion of the Business Park and to continue to generate the vast majority, if not 100%, of the energy demands from renewable sources. There are a number of options available to achieve this objective such as drawing electricity from the second turbine within the anaerobic digestion plant or roof mounted photovoltaic panels etc.

With these options available, the masterplan proposal combine an opportunity to deliver economic growth with the very prudent use of natural resources.

- c. Promoting social wellbeing

Since the masterplan contains proposals for employment growth, this will not result in an increased resident population with the requisite need for community facilities such as healthcare, affordable housing or education etc. The Masterplan proposals nevertheless seek to address what the owners consider to be an existing shortfall in recreation and amenity space for the workday population.

New recreation routes have been incorporated within both the existing Business Park and expansion areas in order to provide recreation and relaxation space for employees. These new

paths connect to wider recreation opportunities on the Grindle Brook corridor and to the Greendale Café and Farm Shop. This element of the masterplan will enhance the social sustainability and well-being for both existing and future employees.

There is also an important social dimension to the economic development proposals. Researchers have found that those unable to access the labour market are more likely to have mental health problems as a result of poverty, stress, unhealthy behaviours, and the implications for future employment. Sustainable economic development and job creation is not only important for the local economy but for the social wellbeing of the community.

d. Encouraging sustainable economic development

We are undoubtedly at the start of a challenging economic period in the UK. The combined effects off the global Covid-19 pandemic and Brexit have increase public sector borrowing at the same time as substantial job losses. The impact is particularly acute for younger people and those in lower income household.

The proposals within this masterplan would facilitate substantial economic growth. Not only will this lead to a considerable increase in jobs at a time when many sectors of the economy are struggling but it will also increase the Council Business Rates revenue which will support the delivery of

public sector services. The following section of this document quantifies the range of economic benefits associated with the masterplan proposals. In a number of respects, the masterplan proposals would support the economic aspects of sustainable development.

e. Taking a long term view of our actions

Expansion of the Business Park as envisaged within this masterplan will have long-term social, economic and environmental benefits for future generations. At a time when the local economy is facing considerable challenges, the proposals within this masterplan present a welcome opportunity to increase employment and economic output at the same time as achieving social and environmental gains. For these reasons, we consider that the masterplan proposals would contribute to the three pillars of sustainable development.



# ECONOMIC BENEFITS

Savills Economic Research Team has produced an analysis of the economic benefits and labour market implications of the Business Park expansion proposals. This analysis is predicated upon the areas identified for development within the masterplan and a number of assumptions based upon the characteristics of the site, local evidence and economic indicators.

In supporting growth and creating these jobs, the expansion of the Business Park as envisaged in the masterplan would result in a range of substantial positive economic benefits. It would help:

