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First Regulation 19 Consultation – East Devon Local Plan – Responses by Chapter

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9.1

Full name: David Morgan

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

9.1

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Page 3, Paragraph 3.

Quote: “Key to this vision is our commitment to delivering genuinely affordable housing and implementing strong measures to reduce carbon emissions both during construction and throughout the operational lifespan of new developments. We also aim to exceed government requirements for biodiversity enhancement and set out a comprehensive strategy to support thriving town centres, robust community facilities, and opportunities for local businesses to flourish.”

Comment: This approach to “support thriving town centres” suggests that effort to “support” will only be provided to town centres that are already identified by the methodology used for the East Devon Local Plan as “thriving”. It does not suggest initiatives will be identified, considered and implemented to try and support other town centres that are struggling rather than thriving, such as coastal towns and those with poor infrastructure. If the approach of the emerging East Devon Local Plan is to try and support all town centres to thrive, then the wording of this sentence needs to be adjusted to read as: “We also aim to exceed government requirements for biodiversity enhancement and set out a comprehensive strategy to support all town centres to enable them to thrive, and advocate robust community facilities and opportunities for local businesses to flourish.”

SE01

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE01

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: The county council notes that the Economic Development Needs Assessment (EDNA) from 2020 has been used as part of the suite of evidence base documents. DCC requests that references to the EDNA in the plan include additional wording to clarify how pre-covid trend estimates and changes in demand for the usage class split have been addressed, which may have been affected by more recent economic trends. DCC also recommends that Evidence Base document ECN-007 is updated. Please see further comments in Appendix 1. DCC considers that all references to the EDNA should include additional wording to clarify how the use of pre-covid trend estimates and the usage class split in the assessment has been addressed, as they may have changed in light of more recent economic trends. In particular, whether the volume of demand and the type of units may have changed since then. This could include, for instance, looking at impacts of remote working on office space and the potential change in demand for warehousing and light industrial.

Full name: Elliott Kelly

Organisation (where relevant): Avison Young

Other party name (if relevant): Aldi Stores Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE01

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: Yes

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: The objective of Draft Policy SE01 is to support employment growth within the built-up area boundaries of the district's towns. The Policy states: "On existing employment and business parks, and on land allocated for employment uses, uses other than E(g), B2 and B8 (offices, research and development, industrial process and storage and distribution) will not be permitted unless they can be shown to be subordinate to, directly compatible with and complementary to the overall business use and will enhance job provision and the effective operation and business appeal of the park or site". We are concerned that the current phrasing of this policy would preclude other employment generating uses which could complement, enable and produce a higher quantum of jobs than offices, research and development, industrial process and storage and distribution uses. Paragraph 85 of the NPPF confirms how the operation of the planning system should view economic growth in both its plan-making and decision-taking limbs. In the application of both it says that "significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development." Aldi believes that to support economic growth and job creation, and to unlock additional investment in the UK, it is vital that the jobs and economic benefits arising from applications for major retail development are recognised in the application of the terms "employment" and "economic development". Job generation, quality and accessibility Aldi food stores deliver the following wide range of positive economic benefits to the local area including:

- Employment provision of up to 40 gross jobs
- Temporary employment provision during the construction process
- Based on Experian data, which sets out that the average GVA per Wholesale and Retail FTE is £37,200 , it is estimated that these roles will deliver just under £1.5m in GVA to the economy each year or around £23m over two decades when adjusted to current values These gross figures do not consider a number of economic factors which would further elevate the associated benefits such as:
 - Leakage: A measure of the extent to which employment will be taken up by people living outside the target areas (i.e. East Devon and the South West)
 - Displacement: A measure of the extent to which investment displaces existing employment (in East Devon and the South West) rather than creating new demand for labour.
 - Multiplier Effects: A measure of the extent to which investment will generate further employment linked to supply chain spending and wage spending of employees. Proposals for a foodstore are considered to deliver more significant better economic benefits than, for example light industrial uses which are currently enabled under Policy SE01 as cited above, for the following reasons:
 - Supermarkets support higher employment densities than light industrial uses as stated in the Government’s Employment Density Guide.
 - The Wholesale and Retail sectors in East Devon generates higher GVA per FTE than roles in the Manufacturing, Transport and Storage sectors. An Aldi food store will also provide ‘good’ and ‘accessible’ employment opportunities. This is important because additional jobs are not necessarily better for a local population if they are not well-paid and accessible. In relation to ‘good’ employment, all hourly paid wages for store employees exceed the Government’s National Living Wage and the Living Wage Foundation’s recommended national rate and remain the only major supermarket chain to pay workers during their breaks. In relation to ‘accessible’ employment, Aldi foodstores create the following benefits:
 - Around 80% of the roles generated will be ‘shop floor’ focused with low barriers to entry. These roles tend to be accessible to people in lower skilled occupations or those with lower-level qualifications.
 - Aldi recruitment is focused locally with job vacancies advertised in nearby stores and in the local press alongside ALDI’s website. This approach usually results in the majority of staff being recruited from the local area. In addition, it is not unusual for the retailer to work with the local Job Centre Plus when recruiting for a new foodstore so that residents of the local area are specifically targeted.

- Aldi ensures employment mobility, with the two of the most successful apprentice schemes and graduate programmes in the UK. Apprentices are trained to work in all parts of the business including at store, distribution, logistics and management level, as well as progression through to the Store Management Team.
- Aldi's on-going graduate scheme secures an annual intake for the Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK-wide programme. These types of roles are important in the Exmouth and East Devon context. This is because over 15% of people in the district have no qualifications and a further 25% only have Level 1 or 2 qualifications which are equivalent to GCSEs or below. There are also challenges related to deprivation across Exmouth – primarily driven by Education, Skills and Training as well as Employment. Complementary and Enabling Uses As is the case with the Dinan Way, Exmouth site, new food stores can also help enable the delivery of more traditional employment uses. Most development sites require significant investment in roads, power, water, sewerage and other utilities in order to bring development forward – an Aldi foodstore is able to provide a serviced plot to help facilitate future employment units on the adjacent plot. Where they are not directly enabling employment or other development, we would also note that retail food stores are inherently complementary uses, serving residents and works in a local area. Where residents/workers are not served by an accessible foodstore, they may be pushed to journeying by car to further destinations to meet their day-to-day requirements given which would in turn generate more vehicle trips during the day contributing to congestion, noise and air pollution. These 'mixed-use' environments also reflect an increasing focus on ensuring that business and industrial parks offer a greater range of amenities to cater to workers. Occupiers are looking for amenity-rich environments to attract and retain employees who now have higher demands from their workplaces. With the above in mind, we would recommend that Policy SE01 is redrafted to put less emphasis on the Use Class Order and more emphasis on the specific economic benefits associated with a particular application in order to realise the wider plan's goals of creating a diverse, inclusive and thriving economy, as well as the desire to boost economic growth which is at the heart of the planning system.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Suggest wording is amended to the below to avoid preclude other employment generating uses that may be equally if not more beneficial in economic terms to that area, as well as compatible with overall uses as set out above.

"On existing employment and business parks, and on land allocated for employment uses, development proposals will be expected to demonstrate that they are directly compatible with and complementary to the overall business use and will enhance job provision and the effective operation and business appeal of the park or site"

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE01

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Natural context is missing from this policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reference should be made to the inclusion of the natural environment within employment areas in order to ensure that people are able to work in areas where they are connected with nature.

Full name: Alexandra Robinson

Organisation (where relevant): Cranbrook Town Council

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE01

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Proposals for Lodge Trading Estate (page 71) could have been more radical to redevelop the whole site for employment (or mixed use), remove the existing issue of HGV movements and, with the right quantum of development, provide parking on the north of the railway line and a footbridge link to the platform of the train station.

SE02

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to be able to address any queries about deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: See attached representation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: We wish to be able to participate in order to provide information to the inspector on matters of importance to rural employment owners.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): GB House and Son

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To emphasise the importance to the local rural economy of supporting the expansion of existing employment sites.

Full name: Claire Alers-Hankey

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Waddeton Park Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: Yes

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Policy SE02: Employment development in the countryside

The theme within this policy is that outside development limits, support for development will be very limited to expansion of existing sites only, and only within the existing operational site boundaries. There are often circumstances where local businesses want or need to grow, and by restricting the ability of a site to expand beyond the existing operational boundary of a site is overly restrictive and has the potential to stifle local businesses. This is not positively planned, is overly restrictive as is not sound due to being unjustified and ineffective.

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To present the case for the inclusion of land north of

Sowton as an employment allocation and to scrutinise the deliverability of the new community within Plan period timescales.

Full name: Nick Matthews

Organisation (where relevant): Savills

Other party name (if relevant): FWS Carter and Sons

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Introduction

1. This representation is submitted by Savills on behalf of FWS Carter & Son (from hereon referred to as 'FWS') owners of Greendale Business Park in response to the Regulation 19 Consultation on the Draft East Devon Local Plan. FWS has instructed Savills on their behalf to submit a series of representations to the relevant policies of the Regulation 19 Local Plan, including this policy. Policy SE02

2. There are huge economic growth and productivity challenges within the UK, with growth virtually stagnant for many years. A key objective of the Labour Government is to drive economic growth and planning reform is a key tenet of that objective.

3. In her Statement on 27 January 2025, Chancellor of the Exchequer Rachael Reeves MP set the scene, reaffirming her commitment to delivering economic growth and stating: "I am fighting every single day in our mission to kick start the economy, deliver on our Plan for Change, and make working people better off. That includes avenues that others have shied away from. Too often the answer to new development has been "no". But that is the attitude that has stunted economic growth and left working people worse off. We need to do things differently and that journey began as soon as I started at the Treasury in July. These are our next steps and I can say for certain, there is more to come."

4. There can be no doubt that this Government is committed to delivering economic growth in the short, medium and long-term. To achieve this step change within East Devon will require a policy framework in the Local Plan which moves away from the

traditional predict and provide approach and allows for greater flexibility in securing economic growth.

5. Such an approach would be entirely consistent with national policy in paragraphs 85 and 86 of the Framework. Paragraph 85 sets the scene stating that: “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support East Devon Local Plan: Regulation 19 (Phase 1) Policy SE02: Employment Development in the Countryside Savills on behalf of FWS Carter & Sons March 2025 2 economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.” [emphasis added]

6. Paragraph 86 then goes on to provide a direct policy requirements for local plans. Of particular relevance to policy SE02 is criterion E of paragraph 86 which states: “Planning policies should: ... be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.”

7. By restricting growth outside of existing designated employment areas, Policy SE02 as currently drafted is unnecessarily restrictive, inflexible and therefore incompatible with the Framework. It does not incorporate the flexibility sought by Paragraph 86 of the Framework and on the contrary restricts economic growth to land within existing operational site boundaries. Such an approach is also in conflict with the spirit of Government economic policy on the drive to support growth. The policy is not therefore consistent with national policy and is therefore unsound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Whilst the allocation of land plays an important part in this and provides certainty, alongside this national policy envisages a flexible approach which enables further land to come forward where it is demonstrated that this would support economic growth in locations which are desired by the market and are capable of responding rapidly to changes in economic circumstances.

9. To that end, and in order to remedy the unsoundness of the local plan, we advocate the addition of the words "or adjacent to" within the first paragraph of policy SE02. This change would enable the growth of existing businesses and business parks beyond their existing boundaries where it is demonstrated that they are currently operating at or close to full capacity and that there is a demonstrable economic need which that expansion would satisfy. 10. In addition to addressing the unsoundness of the Local Plan, there would be a number of benefits in making this change to the policy. East Devon Local Plan: Regulation 19 (Phase 1) Policy SE02: Employment Development in the Countryside Savills on behalf of FWS Carter & Sons March 2025 3 11. First, it would provide considerably greater flexibility to ensure that the wider economic needs of the functional economic area are accommodated. As explained within other representations, there is significant change proposed within the Exeter City Local Plan which will see the replacement of many traditional employment areas with mixed use residential and office floorspace. This will inevitably displace existing businesses and remove land and buildings available to a wide range of businesses including many SME and start up operators. These businesses will either close or look to relocate and opportunities therefore needs to be provided to accommodate this growth within the wider functional economic area. 12. Second, as paragraph 86 of the Framework suggests, flexibility is required to enable a rapid response to changing economic circumstances. It is impossible to determine and defined through the Local Plan precisely where all businesses will seek to locate. There may be some where the profile of the Exeter Science Park is important, whereas for others affordable, less prestigious surroundings are needed to meet the requirements of the business. Positively supporting growth across a wider variety of locations would ensure that all opportunities are taken to achieve economic growth objectives. Conclusion 13. In conclusion, Policy SE02 as currently drafted is unduly inflexible, not consistent with the Framework and therefore unsound. A relatively minor change to the policy which enables the growth of existing businesses and business parks where there is a proven economic need, would remedy this unsoundness and deliver economic benefits to East Devon during the plan period.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Nick Matthews

Organisation (where relevant): Savills

Other party name (if relevant): FWS Carter and Sons

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: 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: East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 2

- 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 East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 3 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 East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 4 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 East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 5 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 East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 6

- 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: East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 7 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 collocation 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 East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 8 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

[Table available in the PDF of this document]

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: East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 10 “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 it 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: East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 11 “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 East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 12 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 East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 13 require engagement and negotiation with landowners.

///// END OF PART 1 - CONTINUED IN PART 2 681e26906efb0400131fe8f8 /////

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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 East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 20 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. East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 21 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:

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Nick Matthews

Organisation (where relevant): Savills

Other party name (if relevant): FWS Carter and Sons

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: Yes

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please refer to the supporting representations attached to this response.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the supporting representations attached to this response.

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: FWS Carter and Sons, as the owner of Greendale Business Park, is a significant landowner and employer within East Devon and is capable of delivering significant development to address the needs and aims identified within the draft Local Plan.

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: This policy should be reworded to include reference to the requirement for protection and enhancement of our natural environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This policy should be reworded to include reference to the requirement for protection and enhancement of our natural environment.

SE03

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE03

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To address any queries regarding the deliverability of this policy.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Glanvill Partners Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE03

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please see attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To emphasise the cruciality of local farming businesses having the ability to diversity without overly-restrictive development management policies.

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE03

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: This policy should be reworded to include reference to the requirement for protection and enhancement of our natural environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This policy should be reworded to include reference to the requirement for protection and enhancement of our natural environment.

SE04

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE04

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: Yes

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.:

4.85. Strategic Policy SE04 considers the loss of employment sites to other uses. This includes sites which are allocated for employment development. The policy states that such changes of uses will not be permitted.

4.86. The policy, however, notes that those sites in B2 and B8 uses will only be permitted for other types of employment use, if it can be demonstrated that, inter alia, the alternative use is in accordance with, or does not undermine, the plan's overall spatial strategy, the site is no longer viable for the current type of employment use but is viable for an alternative type of employment use (evidenced by a compliant viability statement), and there is a lack of demand for the current type of employment use at the site (evidenced by a compliant marketing statement).

4.87. Compliant viability, marketing and supply statements must adhere to the respective requirements set out in the relevant guidance published and be available online via the Council's website. If an alternative use is acceptable, then applicants will be required to demonstrate that they have endeavoured to incorporate an appropriate (in terms of scale and type) element of employment floor space as part of the new development.

4.88. The supporting text allows for exceptions where alternative employment uses or mixed-use regeneration can be justified, provided they support the sustainability and viability of employment areas (Paragraph 9.20) whilst Paragraph 9.22 states as the

economy evolves, not all employment areas will remain viable for their current uses. The policy allows for alternative uses if there is no realistic prospect of continued employment use, but this must be supported by robust evidence of viability and market demand. If an alternative use is appropriate, incorporating an element of employment provision should be considered.

4.89. The direction of this policy is supported by Bloor Homes. It notes that there will be a presumption against alternative uses of employment sites unless there is sufficient evidence to demonstrate that these uses will provide for suitable job creation, that there is a demand for this use, and that conversely there is no demand for more-traditional employment uses.

4.90. In this regard, we would refer to our representation to Strategic Policy SO4. This states that if technical evidence demonstrates there is demand for a non-traditional employment use and that the supply of employment land for offices, industrial and logistics is sufficient then alternative employment uses should be permitted on sites. This approach will allow for a responsive and evidence-based allocation/development of employment land ensuring that East Devon can attract and retain a diverse range of businesses.

4.91. Provision within the policy should also provide greater flexibility in the quantum of land required for employment uses, as it might be the case that emerging industries require less space (than that allocated in the Local Plan) to meet the same level of employment creation.

4.92. It is considered that the current draft of Policy SE04 reflects this, however, we would note that criteria for when exceptions to the presumption against can be applied are drafted only in relation to existing employment sites, whilst the first paragraph states that the policy relates to those sites that are allocated. The provisions in the policy therefore needs to address existing employment sites and proposed employment allocations

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

4.93. Bloor Homes does not object to proposed strategic policy.

4.94. That said, they consider that its wording should be re-considered so that it more clearly addresses proposed employment allocations, particularly, when the exceptions apply to the presumption against alternative uses on employment sites/allocations.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE04

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not legally compliant. Please be as precise as possible.: A supporting Statement has been submitted on behalf of Bloor Homes in respect of the Land to the South of Littleham, Exmouth. It has been submitted in respect of Policy SP01 but considers Policy SE04 and others

2(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please see Supporting Statement

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Please see Supporting Statement

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The matters raised in our representations affect matters of strategic importance that run to the heart of the East Devon Local Plan 2020 to 2042. In our capacity as a major housebuilder, we would welcome the opportunity to partake in the hearing session(s).

SE05

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Taylor Wimpey Exeter

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE05

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: The policy refers to adhering to the requirements set out in "relevant guidance published and available online via the Council's website." We are not clear what guidance is referenced here noting the supporting text at para 9.26 states that "guidance on these plans and statements will be published on the Council's website" (emphasis added). If the policy requirement is based on existing available www.carneysweeney.co.uk guidance this needs to be confirmed so it can be reviewed. Conversely if there is no guidance published yet we cannot properly comment on the merits/reasonableness of the policy. Ultimately, any conditions or obligations will need to be broad and flexible enough to be achievable for larger developments to properly implement, as workforce strategies over the course of a number of years can face changing environments.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Further clarity required to properly comment.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: CORAL CURTIS

Organisation (where relevant): Grass Roots Planning

Other party name (if relevant): BROADCLYST LVA LLP (LVA)

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE05

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: Yes

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Policy SE05 relates to Employment and Skills Statements. It states that all major developments will be required to submit a basic Employment and Skills plan. Any developments over 100 homes or on employment sites of 5,000 square metres or greater will also need to provide an Employment and Skills Statement, which commits to maximising the provision of skills and employment opportunities, to benefit the local population as well as the employer. We appreciate the reasoning for this Statement, to enhance employment and skills in the area. We, therefore, do not have an issue with this requirement.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: TO RESPOND, AS REQUIRED, TO ANY QUESTIONS IN RELATION TO POLICY SD07 AND IN PARTICULAR SITE BRCL_12.

Full name: Jeremy Gardiner

Organisation (where relevant): Pegasus Group

Other party name (if relevant): Taylor Wimpey Strategic Land

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE05

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: This policy states that “Compliant Employment and Skills Statements must adhere to the respective requirements set out in the relevant guidance published and available online via the Council’s website.” That guidance does not appear to be available – it could not be found in the evidence base for the local plan. If the guidance has not been published yet, that is required before any meaningful comments can be made. In any event, any conditions or obligations will need to be broad and flexible enough to be achievable for larger developments to properly implement, as workforce strategies over the course of a number of years can face changing environments.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE05

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.:

4.95. This policy requires all major development over 100 homes to submit a basic Employment and Skills plan. The purpose of this plan is to commit the applicant to maximise the provision of skills and employment opportunities, to benefit the local population as well as the employer. These documents should be submitted with planning applications and will be implemented through a planning obligation or condition.

4.96. The supporting text notes that these statements should outline commitments to local employment and seeks to support economic growth by raising skill levels in the district.

4.97. Bloor Homes supports the Council's approach in seeking to ensure that the economic and employment benefits of major developments are focussed on the local area. However, they would note that such Statements are likely to replicate much of the

information that is required to be submitted with major developments such as Socio-Economic Chapters within Environmental Statements.

4.98. This is not to say that Bloor Homes does not wish to support the local economy and, as a company, they seek to employ as many local firms as possible given that they are usually the most convenient and have the most appropriate skill sets for work on their sites. However, it is felt that there are better mechanisms to achieving this goal than the provision of an additional statement or report. Rather, Bloor Homes would wish to work closely with the Council's Economic Development Team during the pre-application stage to agree and confirm the approach to be adopted. This process can then agree how the approach to focus employment and spending in the local area can come forward.

4.99. This is the approach that is currently being adopted at Land to the South of Littleham, Exmouth and it is considered one that will not be aided by the preparation of an additional, unnecessary statement.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

4.100. Bloor Homes object to this policy.

4.101. It is not considered that an Employment and Skills Statement is needed and it will add extra expense and time to the planning application process. These matters can be adequately addressed in other supporting information and through negotiation and agreement with Officers during the pre-application stage.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE05

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not legally compliant. Please be as precise as possible.: A supporting Statement has been submitted on behalf of Bloor Homes in respect of the Land to the South of Littleham, Exmouth. It has been submitted in respect of Policy SP01 but considers Policy SE05 and others

2(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please see Supporting Statement

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Supporting the Economy and Town Centres chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Please see Supporting Statement

4(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Please see Supporting Statement

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The matters raised in our representations affect matters of strategic importance that run to the heart of the East Devon Local Plan 2020 to 2042. In our capacity as a major housebuilder, we would welcome the opportunity to partake in the hearing session(s).

SE06

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE06

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: DCC notes the sequential test evaluation was undertaken in 2023 and the most recent town centre retail vacancy rates from December 2024 indicate that there are currently high retail vacancy rates, particularly in Axminster and Honiton. The county council recommends that this evaluation is updated and wording within the Local Plan revised accordingly. However, should an update not be possible, DCC requests that the following wording is added to the end of paragraph 9.33 to make clear that the evidence (ECN-007) was produced in 2023: “It should be noted the sequential test was undertaken in 2023 and the most recent town centre retail vacancy rates from December 2024 indicate that there are currently high retail vacancy rates, particularly in Axminster and Honiton.”

Full name: Terry Sneller

Organisation (where relevant): Dorset Council

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE06

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: It is however important that through the application of Policy SE06 that Lyme Regis town centre is recognised. The role and function of Uplyme is very different when considered alongside Lyme Regis. This is particularly relevant when applying the sequential approach to retail development and when undertaking any retail impact assessments in reasonable proximity to Lyme Regis.

SE07

Full name: Ian Wasson

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE07

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: With small towns like Budleigh Salterton, frankly there are now too many shops for the size of the town, which lies very near to Exmouth with a much larger shopping centre. This means that shops remain empty, look dreadful and reduce the overall attractive appearance of the town. Landlords should be encouraged to maintain their shop fronts, and more importantly it should be easier to convert commercial premises to housing to help meet housing needs that having to build on open countryside.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE07

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: ‘and enhance the natural environment wherever possible’

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ‘...wherever possible’ is superfluous and should be removed as it undermines the point which is being made. It is always possible to enhance the natural environment. Even small enhancements such as hanging baskets or planters on the corners of streets can provide enhancements for nature. The provision of well designed, connected, diverse natural corridors through town centres can act as important flagship projects showcasing the benefits of the natural environment.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE07

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: We are supportive of Policy SE07 insofar as it promotes vibrant town centres while protecting historic shop frontages in cases where the ground floor may be converted to another use.

SE09

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE09

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To address any queries regarding the deliverability of this policy.

SE10

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE10

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to be able to address any queries regarding the deliverability of this policy.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr and Mrs Feast

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE10

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Richard John Eley

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE10

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not legally compliant. Please be as precise as possible.: This policy has been refined and improved, so my concerns are somewhat reduced.

However, with current policy, which it is proposed to continue for the duration of the Plan, we will see a continued decline in our tourism industry and a further trend towards downmarket tourism. Specifically, current policy allows hotels to close, but precludes new hotels to open, except in unusual circumstances. In the UK, the number of hotels is slowly but steadily increasing, whilst in East Devon they are in decline. We must ask why. East Devon remains an attractive tourism destination, but hotel guests, who spend much more than other tourists, are declining in number. The explanation is surely that planning permission for new hotels is very difficult to obtain, but permission for closure and replacement with residential development is much easier. In Sidmouth, we have lost 75% of our hotels in the last 50 years, and the trend is continuing: most recently we have seen the loss of the Fortfield and Glendevon hotels to residential development, and the closure of the Sidholme Hotel with the same outcome very likely. No new sites can be delivered in Sidmouth, as all suitable locations are outside the BUAB, and thus undeliverable given current planning policy.

We know that new hotels are likely to thrive, because we see the Premier Inns at Exmouth and Seaton apparently flourishing. Likewise the much improved and upgraded Lymptone Manor and The Pig at Combe.

The problem is that EDDC does not appear to know that many hotels have closed. The Council still believes that the Brownlands Hotel in Sidmouth is open even though it closed and was changed to residential use twenty years ago.

This aversion to hotels, which offer all year round staff jobs, and bring high value business throughout the year, is matched by an enthusiasm for camping and caravan sites, which are often a blight in the countryside. Whilst East Devon's hotels are closing quite rapidly, they are being replaced by unwanted development in the countryside and second homes. East Devon has far more caravan parks than any other Devon district.

Tourism, especially with quality hotels, is important and offers well paid jobs, training and career opportunities.

This Chapter does not include any policies for improving our town centres and making them more attractive and viable. There is the feeling that the Council has given up on tourism and would prefer industrial sites instead. We need a more balanced economy that is less Exeter-focussed, and supports our Tier 1 and 2 towns. We also need to support our villages and the shops, pubs, and community facilities they provide. We could for example promote cultural activities and health and wellbeing, by encouraging walking and cycling, especially the former, which could greatly improve the local economy if supported and promoted. Sports such as golf can generate a lot of economic growth if they were to be encouraged.

2(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A specific section on promoting new hotels and supporting those already operating should be included. A section on the economic benefits of sport and recreation should also be added. We also need to identify how we can improve public realm, and address the continuing decline and deterioration of the condition of our town centres. We must raise our game, and identify policies to improve the presentation of our towns and villages, and to attract more upmarket visitors, especially during the shoulder seasons and the winter.

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: See above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See above.

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Supporting the Economy and Town Centres chapter's compliance with the duty to co-operate, please use this box to set out your comments.: See above.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like to discuss the benefits of encouraging new hotels, improving the appearance of our town centres and promoting recreation, health and wellbeing to support our tourism economy.

Full name: Margaret Leppard

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE10

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Policy dissonance - where do priorities lie? Nature based tourism? Seaton along with other areas in East Devon promotes itself as a destination for nature based tourism. However, the draft Strategic Plan still proposes SEAT_02, 03, 05 and _13a for development. Other contributors to the consultations have commented on the impact of these sites on the local environment and ecology. The Seaton Tramway has recently invested in an additional stop for tourists to access the wetlands. However recent planning applications have not included any visualisation data from the top of the tram or from the new stop. How can we genuinely promote nature based tourism when the view to the west is of housing estates? Also visible from the B3172 and Harepath Road!

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE10

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: ‘Positively contribute to the natural beauty, wildlife and cultural heritage of the District’. We welcome the inclusion of this requirement within this policy, but it is unclear why this is included here and not elsewhere within the Local Plan. This statement will result in enhancement of the natural environment, working towards the council’s objective of ‘an outstanding natural environment’.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This type of phraseology should be included within the majority of policies.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE10

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: This policy requires several key details and requirements but fails to mention flood risks and management of wastewater, which would contribute to the overall sustainability of the proposals.

SE11

Full name: Andrew Eric Langman

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE11

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: I support this policy and believe it to be legally compliant

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: I fully support the adoption of this policy with a few tweaks to tighten the policy against it be misconstrued, misinterpreted or having unforeseen consequences by omission of policy specific detail. The following suggestions for amendments and additions to the draft text are proposed based on experience of local residents in how the new owner of Salcombe Regis Caravan and Camping park has deployed numerous legal experts over the last 3 years to try every trick in the book and seemingly endless attempts to re-imagine existing planning permissions and bypass local consent for changes that would drastically alter the mix and type of accommodation provided, the season of use and the impact on the local community. Had this policy been in place 3 years ago, a huge amount of planning officer workload and local resident angst would have been avoided.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It

will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Amendments to second introductory paragraph of the policy as the original was silent on: changes (as different to extensions) and requirement for compliance to other pertinent policies and existing planning permissions ... as follows :

Proposals for the change to, extension of, or related and ancillary facilities on, existing sites will be permitted provided they align to other pertinent policies, comply with existing planning permissions and meet the following criteria in full:

Additional criteria to be added following bullet point A as the original was silent on several important policy specific matters ... as follows:

A1. No re-designation of camping pitches to touring pitches or of touring pitches to permanent pitches are to be provided;

A2. No change to the dates of seasonal use restriction is to be provided;

A3. No change from seasonal use to all-year use is to be provided;

A4. No change of use from holiday accommodation to residential accommodation is to be provided;

A5. No reduction of on-site green spaces or recreational amenities is to be provided;

Amendments to bullet point C. of the policy as the original is largely silent on local impact ... as follows:

C. The proposal would not have an adverse impact on local character or the amenities of the local community;

Amendments to bullet point E. of the policy to clarify that the proposal should include for provision of services and utilities ... as follows:

E. The proposal will provide for adequate services and utilities;

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

Full name: Robert Maynard

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE11

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: Yes

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.:

1. Introduction

I would like to bring to your attention that Policy SE11: Holiday accommodation parks in designated landscapes is unsound because it fails:

a) to effectively restrict new holiday accommodation parks in East Devon's most sensitive landscapes,

b) to comply with the requirements of NPPF paragraph 187 sub para c) by maintaining the character of the undeveloped coast, while improving public access to it where appropriate.

2. Background Information

The Regulation 19 - Local Plan Policy states:

“Policy SE11: Holiday accommodation parks in designated landscapes

Within the District’s most sensitive landscape areas, including National Landscapes, Coastal Preservation Areas and Green Wedges, new caravan, chalet or other holiday parks will not be permitted.

Proposals for the extension of, or related and ancillary facilities on, existing sites will be permitted provided they meet the following criteria in full:

- A. No additional permanent pitches or accommodation are to be provided, although upgraded accommodation of a similar size and height will be allowed on the footprint of existing permanent accommodation where this will result in an environmental improvement;
- B. The proposal relates sensitively in scale and siting to the surroundings and includes extensive landscaping and visual screening to mitigate against adverse impacts;
- C. The proposal would not have an adverse impact on local character or the amenities of adjoining residents;
- D. The proposal would not use the best and most versatile agricultural land;
- E. The proposal will be provided with adequate services and utilities;
- F. Traffic generated by the proposal can be accommodated safely on the local highway network and safe highway access to the site can be achieved;
- G. The proposal will be subject to the provisions of plan policy in terms of sustainable construction, on site renewable energy production and biodiversity net gain; and

H. Any structures beyond the existing boundary of the site are temporary and any visual or other harm can be satisfactorily mitigated.

This policy does not apply in the Cranbrook Plan area.”

3. Policy SE11 should be amended to ensure it is effective and consistent with National Policy

Not permitting new caravan, chalet or other holiday parks or proposals for extensions of existing sites in National Landscapes (AONB), Coastal Preservation Areas and Green Wedges to protect the most sensitive landscapes is consistent with:

a) NPPF policy that give “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes” (Paragraph 189).

b) CroW Act Duty to protect

c) Objective 8 of the Local Plan “To protect and enhance our outstanding natural environment and support an increase in biodiversity.” (Objective 8)

Policy SE11 should be amended to ensure it is effective and consistent with National Policy to maintaining the character of the undeveloped coast

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It

will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

4. Recommendation

The Policy SE11 be amended as follows

Policy SE11: Holiday accommodation parks in designated landscapes

Within the District’s most sensitive landscape areas, including National Landscapes, Coastal Preservation Areas and Green Wedges, new caravan, chalet or other holiday parks INSERT “and proposals for the extension of existing sites or the conversion of existing touring caravan sites for such uses” will not be permitted.

Proposals for DELETE “the extension of, or related and” INSERT “upgrading accommodation” and ancillary facilities on, existing sites will be permitted provided they meet the following criteria in full:

A. No additional permanent pitches or accommodation are to be provided, although upgraded accommodation of a similar size and height will be allowed on the footprint of existing permanent accommodation where this will result in an environmental improvement INSERT “(sites with three or more static caravans will be expected to reduce the overall number of units/pitches)”;

INSERT “A+. There is no intensification of use or activity, the existing site area is not extended and the site is retained as a single business unit;”

INSERT “A++ Seasonal holiday restrictions and short stay holiday occupancy conditions will apply to mitigate adverse impacts of light pollution and local amenity. “

B. The proposal relates sensitively in scale and siting to the surroundings and includes extensive landscaping and visual screening to mitigate against adverse impacts;

C. The proposal would not have an adverse impact on local character or the amenities of adjoining residents;

D. The proposal would not use the best and most versatile agricultural land;

E. The proposal will be provided with adequate services and utilities;

F. Traffic generated by the proposal can be accommodated safely on the local highway network and safe highway access to the site can be achieved;

G. The proposal will be subject to the provisions of plan policy in terms of sustainable construction, on site renewable energy production and biodiversity net gain; and

DELETE “H. Any structures beyond the existing boundary of the site are temporary and any visual or other harm can be satisfactorily mitigated.”

This policy does not apply in the Cranbrook Plan area.

INSERT NEW POLICY

“New Policy SE??

Permissions for campsites and touring caravan sites will be subject to conditions requiring that:

a. Tents, motorhomes, and caravans are restricted to short-stay holiday occupancy only; and

b. no tent or caravan occupies any pitch for more than 28 days.”

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure Policy protects and enhances our outstanding natural environment

Full name: Giles Sadler

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE11

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: I support this policy and believe it to be legally compliant

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: I support the adoption of this policy but with some additional specific policy detail to help avert misinterpretation and unforeseen consequences.

The following suggestions for amendments and additions to the draft text are based on the experience of local residents of Salcombe Regis where the current owners of the Camping & Caravan park have utilised loopholes in planning policies to avoid proper public scrutiny of a full planning application. These includes the use of ‘variation’ applications to historic planning permissions and the use of Section 73 Applications to remove historic conditions that would result in fundamental changes to the way the site operates and impact on the amenity of the local community and historic environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Suggested addition

to second Introductory paragraph to deter proposals that challenge or undermine policies designed to protect sensitive and historic landscapes:

"Proposals for the extension of, or related and ancillary facilities on, existing sites will be permitted provided they align with all relevant policies and existing designations and meet the following criteria in full:"

Suggested additional text to follow criteria A to prevent trend of converting grass camping pitches to hardstanding touring pitches and then to permanent static caravans and lodges: "A.1: No re-designation of camping pitches to touring pitches or of touring pitches to permanent pitches are to be provided; To address the creep of open amenity space lost to hard standings and permanent structures" "A.2: No reduction of on-site green spaces or recreational amenities is to be provided;"

Suggested amendment to wording of criteria C to acknowledge the impact can be wider than just the adjoining residents (e.g. traffic congestion, light pollution).

C. The proposal would not have an adverse impact on local character or the amenities of the local community;

Suggested new criteria 'F'. In the case of Salcombe Regis Campsite - the applicant has used a section 73 variation application that would remove the condition on historic planning permission that prevents winter occupation of the site. The removal of the condition would result in the site's status changing from seasonal (closed over winter months) to all-season which would be a fundamental change in the way the site operates and have a significant impact on the amenity of the local community and the historic environment.

"F. If the proposal would result in a significant change to the way the site currently operates full planning permission will be required."

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE11

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: This policy needs reference to the requirement for protection and enhancement of the natural environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: In areas where existing nature value is high, where land forms important nature corridors/buffers and where land has high potential for nature recovery alongside other uses, then DWT would urge higher BNG expectations such as 25%.