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East Devon District Council  
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06 January 2023

*By Email Only*

Dear Sir/ Madam

**MLPD 21019 On Behalf of Mr P Halse (Halse SW Ltd) East Devon Local Plan 2020-2040  
Preferred Options Regulation 18 Draft Plan Consultation Response**

On behalf of our client, Mr P Halse (Halse SW Ltd), we submit representations in relation to the Draft East Devon Local Plan. Our client is an important local employer with a regionally important and successful rural based business supplying and servicing farm machinery and implements from its state-of-the-art base at Daisy Mount in East Devon District.

**Employment Land Supply and Delivery**

Alongside housing growth, the strategic objectives of supporting business investment, job creation opportunities and building a resilient economy must be at the heart of the plan. Policies will need to help make the district an attractive and competitive place to start, grow and invest in a broad range of businesses, attracting more and higher skilled jobs and attracting and retaining people of working age.

A report to Strategic Planning Committee (22nd June 2021) states that in terms of achieving “matched” housing and employment new employment provision is around 1/3 (33%) behind in the delivery of new jobs compared to housing since the adoption of the current Local Plan.

There is a growing demand for additional employment land in the district and subregion to serve successful companies wanting to expand into the subregion and for businesses that want to relocate to the subregion. Additionally, there is demand for land to accommodate the strong and sustainable growth of existing successful businesses across the district and subregion; businesses like Halse SW. Supply is falling well short of demand causing significant negative economic and

social impacts. The Council independently recognised the imbalance in availability and supply with a Report to Strategic Planning Committee (22nd June 2021).

This is not a new issue. The HotSW Employment Land Study Research Findings, 5th December 2019 found that East Devon frequently failed to fulfil enquiries. The Report to Strategic Planning Committee (22nd June 2021) cited a lack of available, unconstrained sites and concluded that even though there was a supply of allocated sites, that many of these were not coming forward for development, suggesting they are not truly available or viable. Therefore, land ownership and viability must be considered critical deliverability issues when allocating employment sites in this plan.

Taken together EDDC committee papers confirm that the western part of the district is the area identified for growth mainly because the same papers recognise (rightly) that two thirds of the EDDC area is covered in the highest tier restrictive landscape policy designations (67% is AONB).

The neighbouring authority, ECC, does not have a five-year housing land supply putting pressure on the small amount of employment land that is available within the City for alternative uses, and some sites previously allocated for employment have already been granted permission for residential uses.

The draft ECC Local Plan proposes an unsustainable “vision” encouraging residential development on existing high performing employment areas such as Marsh Barton. This would result in the further displacement of employers and occupiers in the City, exacerbating the imbalance with surrounding authorities, and worsening the documented (including in Council papers) demand and undersupply of employment land within East Devon and the subregion.

Simplified, the current shortfall within EDDC and the additional context within adjoining ECC means that the emerging East Devon Local Plan must plan effectively and collaboratively for the sustainable release and delivery of high-quality employment land in the most suitable locations to benefit new, relocating and expanding businesses like our client’s. If it cannot demonstrate that the proposed strategy is appropriate and will meet the Local Plan objectives and the needs of the district and subregion up to 2040, then significant parts of the plan will fail.

It is likely that differing policies and strategies will be needed within East Devon to accommodate the growth that is required. Viably delivering the employment numbers required in the plan period means that more land will need to be released in line with market, district, and subregional needs.

Our client believes that the Council, in line with Sustainability Appraisal work commissioned by it, should continue to encourage development away from protected landscapes afforded the highest level of national planning policy direction (e.g., World Heritage Sites; Areas of Outstanding Natural Beauty; 2/3 of the district is covered by an AONB designation) and that strategic housing and employment development should continue to be focussed where key infrastructure exists or is planned for. (EDDC committee papers have also confirmed that the main town of Honiton should be a focus for growth within East Devon, too.)

An Employment Land Review undertaken by Alder King in March 2021 indicated that the total supply in the market including allocated land, development sites and existing buildings was equal to 8.36 years demand.

What this indicates is that more land is required to enable more of the demand to be fulfilled and help address the current imbalance between supply and demand.

Furthermore, the displacement of employers and occupiers in Exeter will create further imbalance with surrounding authorities, putting significant pressure on EDDC, exacerbating the already chronic undersupply of employment land within the district. This undersupply is well-documented.

### **Policy Specific Commentary**

Policy 52. Policy – Employment development in the countryside Intensification of existing employment businesses in the countryside. The Council's third priority is for a resilient economy, suggesting it will support and promote job growth in the district. Elsewhere in the Local Plan, supporting text recognises the importance of jobs to the functioning of the district's economy and the strong unmet demand for business premises.

The supporting text to this policy acknowledges that the EDNA will provide evidence about the mix of sites needed to support businesses. It recognises that there will continue to be a need for a wide mix of sites in terms of size and quality to suit the needs of businesses now and as they change over time. Our client supports this conclusion.

It is noted that paragraph 9.22 recognises that it is important for East Devon to develop its employment base and where established sites are successful, an intensification of employment uses, or extension of an existing employment site can be considered if this supports additional employment accessible to local communities. This enables development to make use of existing sites and infrastructure. Our client supports this conclusion.

It is welcomed that paragraph 9.23 recognises the need to balance matters of adverse aesthetic impacts relative to the expected economic, social, and environmental benefits of a proposal where there is evidence of high demand for employment development. This however should be given specific reference within the policy text rather than as supporting text only.

Similarly, the reference to additional consideration being given to existing East Devon employers where the proposed development will safeguard valuable existing jobs, should be given specific reference within the policy text.

## **Our Client**

Our client, Halse SW Ltd owns and operates a highly successful business south of Honiton off the A30 at Daisy Mount, specialising in the sales and servicing of farm machinery and implements across the UK and internationally.

Founded in the early 1880's and managed today by its fifth generation, the business is in state-of-the-art premises which it moved into in January 2017 and has gone from strength to strength since the move.

Our client thanks you for the opportunity to comment.

If you require further information, please contact us at the above address.

Thank you.

Yours faithfully

James

**James McMurdo MRTPI MRICS**

Director

For and on behalf of McMurdo

Copies: Client