

INTRODUCTION

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

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

CHAPTER 5. DEVELOPMENT IN THE TOWNS AND VILLAGES

Strategic Policy SD11: Development Allocations at Woodbury

GB House and Son supports the development allocations for Woodbury listed in Strategic Policy SD11 and identified on the Policies Map, particularly Land at Gilbrook (site reference Wood_10) and Land south of Broadway (site reference Wood_16). The inclusion of sites Wood_10 and Wood_16 for residential-led development is supported as they represent logical approaches to development and growth to the south of Woodbury.

Strategic Policy SD11 is not considered to be sound overall, however, as the approach that has been taken to site allocations is not the most appropriate when compared to other options that could have been chosen to make sure the area's need for housing and employment can be met and that growth is planned for in a strategic and comprehensive manner.

Throughout the new East Devon Local Plan consultation process, we have promoted our client's site in Woodbury - Land to the east of Higher Venmore Farm (**site reference Wood_12**) as a site that is capable of delivering, in the short term, housing, affordable housing and other services/facilities that the village needs. The site, which covers 8.1 ha, has been put forward and is available now. The land is close to the centre of Woodbury and abuts two sites allocated for housing development (Wood_10 and Wood_16).

Ultimately, East Devon District Council has so far chosen not to allocate the site as the view has been that the scale of development would be inconsistent with the spatial strategy when combined with other preferable sites in Woodbury. Some concerns have also been raised re. medium/high landscape

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

sensitivity given that the land rises to the south. We remain of the firm view that this site should be allocated for housing, which would make a meaningful contribution towards housing supply for the district. The merits of this approach are:

- Wood_12 abuts the boundaries of sites Wood_10 and Wood_16 (which are allocated for housing development) and allocating the three sites would enable a more strategic, comprehensive approach to growth to be taken. This is particularly important for matters such as pedestrian connectivity, which is a very hot topic locally, and vehicular access. Vehicular access could come from Eye View Lane to the west and/or from Wood_10 to the north. It is important to note that our client is already liaising with 3West (local housebuilder for site Wood_10) on more comprehensive development opportunities and, in particular at present, to deliver a new footpath and bridge link that would provide a new pedestrian link from Wood_12 to Wood_16 and Broadway, beyond. This will provide excellent connectivity for the site and enhance its sustainability credentials.
- The northernmost part of the site is on lower ground and, therefore, has lower landscape sensitivity. An initial landscape capacity study has been carried out by FPCR Environment & Design – a copy of which is included with these representations. Any future planning application would be supported by robust landscape and visual impact analysis.
- Allocating some additional land in Woodbury creates opportunities to deliver more affordable housing and other services/infrastructure/community facilities for the village (a doctor's surgery, for example, has been suggested previously). In addition to this, there are increasing obligations on developers to deliver biodiversity net gain, open space etc. and obligations of this type can often to be difficult to accommodate on development sites, which results in less joined-up financial contributions in place of on-site provision. Allocating Wood_12, in addition to Wood_10 and Wood_16, would create logical opportunities for more comprehensive growth.

For all the reasons set out above, Land to the East of Higher Venmore Farm (Wood_12) should be allocated for housing development within Strategic Policy SD11, alongside Wood_10 and Wood_16, which is a more appropriate strategy for meeting the area's need for housing.

In addition to the above, we have promoted throughout the new East Devon Local Plan consultation process our client's land adjacent to Woodbury Business Park, site reference **Wood_31** (see also the comments made on Strategic Policy SP04). Our client owns Woodbury Business Park, a well-

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

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

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

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

Our client also commissioned advice from landscape consultants Redbay Design on landscape sensitivity and a Preliminary Landscape Appraisal, dated June 2024, was included with representations made to the East Devon Local Plan Further Consultation in June 2024. Redbay Design considered a

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

development strategy for the site that would take account of the identified sensitivity and seek to avoid undue landscape and visual impacts. The strategy would include a development exclusion zone along the western flank of the site. Minor cutting into the ground would allow for buildings to sit into the site and views would be deflected over buildings' roofs. These measures would create a significant natural containment of the site from principal views from the west. Other mitigation/assimilation measures could include the introduction of new hedgerows, akin to the historic pattern, to contain the area of development and the introduction of new oak trees, which are a key feature of the local landscape.

It should be noted that Woodbury Business Park has been commended and EDDC organised a visit for planners and architects to view the site as a case study of a successful development in the countryside. The owner takes great responsibility for ensuring that any development at the business park is aesthetically pleasing and this is the approach that would be taken to the development of Wood_31.

Wood_31 should be allocated within Strategic Policy SD11 as employment land to facilitate the growth of local businesses, reduce out-commuting to Exeter and retain more jobs for the district. As drafted currently, this part of the Local Plan is not consistent with national planning policy objectives of creating prosperous rural economies or the draft Local Plan's own objective of providing a resilient economy and it is not, therefore, considered to be sound.