



CHARTERED TOWN PLANNERS

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EAST DEVON LOCAL PLAN 2020-2040

PREFERRED OPTIONS REG.18 CONSULTATION DRAFT PLAN – AUTUMN 2022

REPRESENTATIONS ON BEHALF OF CLYST HAVEN LTD

Introduction

Bell Cornwell acts as planning consultants for Clyst Haven Ltd – landlords, investors and developers of commercial property throughout the South West, based in East Devon. It is in this context that the following comments are made on the draft policies of the East Devon Local Plan Preferred Options. These follow on from representations made to earlier drafts of the plan, notably the Issues and Options version, and Call for Sites, in 2021.

The Vision for East Devon

Our client supports the Vision for East Devon, in terms of its encouragement of a more resilient local economy.

03 The Spatial Strategy of the Plan

1. Strategic Policy – Spatial Strategy

The following comments are made with a focus on the distribution strategy for employment provision.

A dispersed spatial strategy that increases the number of locations where some development can be accommodated is supported, as this will help to ensure that local needs are met more adequately than they have been in recent years.

It has been rehearsed at length that there are barriers to business growth across much of East Devon and that there is a significant imbalance between supply of certain forms of employment land and demand in East Devon. Whilst provision has been made for the delivery of large employment sites/floorspace in the West End, it is clear that there is an ongoing shortage of sites available for small and medium sized businesses elsewhere in the district. These businesses play an important role in the local economy and it is vital that proper provision be made for them in the right locations, for example, close to existing operations and main road networks. If adequate provision is not made, growth will be stifled or lost to locations outside of East Devon. Therefore, economic development right across the district must be encouraged.

To complement the type of employment provision made in the West End, support should be given to employment development in other areas closer to Exeter, such as along the A3052 corridor where there is already a considerable amount of employment and infrastructure and good access to the strategic road network. This would align with key objectives of national planning policy to support prosperous rural economies i.e. paragraphs 84 and 85 of the NPPF, which state:

“Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses;*”

“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

4. Strategic Policy – Employment Provision and Distribution Strategy

The draft policy states that provision will be made for a net increase of sufficient new employment floorspace to meet need and ensure that a choice of appropriate land is available in sufficient quantity, and of the right quality, to drive the economic growth of, and support prosperity in, East Devon. More clarity is needed on precisely what is meant by ‘a net increase’ and ‘sufficient new employment floorspace.’

The draft policy goes on to state that the level of need will be informed by the ongoing Economic Development Needs Assessment, which will be ‘available in time.’ The EDNA will also inform the Council’s site selection and site capacity estimates. This is a fundamental part of the strategy and it is premature to advance the draft local plan in advance of the EDNA being published. There are fundamental uncertainties which have yet to be addressed and which could have significant and important implications for the strategic approach to new development.

To re-iterate the comments made on the draft spatial strategy, it has been acknowledged widely that there is a significant imbalance between supply of certain forms of employment and employment land and demand in East Devon. It is clear that there is a shortage of sites available for small and medium sized businesses across the district, outside of the West End. These businesses play an important role in the local economy and it is vital that proper provision be made for them in the right locations, for example, close to existing operations and main road networks.

In terms of the location of development, the draft policy states that existing employment areas that will continue to be the primary locations for industrial, warehousing, offices, distribution development and other B Class Uses are identified on the Policies Map. It is noted, following discussions with the Council’s Planning Policy Manager on 5th January 2023, that not all existing employment sites are shown on the Policies Map. The policy wording needs to make it clear that this policy relates to all existing and allocated employment sites, as we understand is the intention, and not just those shown on the Policies Map.

Our client owns an employment site known as Hill Pond, which is located directly to the north of the A3052 and abuts the western boundary of Hill Barton Business Park. Full planning permission was granted at appeal in November 2018 for a high quality office development (planning application reference 17/1329/MFUL). The planning inspector who dealt with the appeal concluded that it is possible to access to site by walking or cycling, particularly from the Cat and Fiddle Inn bus stop, which benefits from a number of regular services. This development has commenced.

On behalf of our client, we submitted representations to the East Devon Local Plan 2021-2040 Issues and Options consultation in March 2021 (ref. **m813lpb**), promoting land immediately to the north of this site for employment use. The site is bounded by the office development site to the south, Hill Barton Business Park to the east and Axehayes Business Park is located to the north west, making this parcel of land an obvious rounding-off site. Included with this submission are copies of the following documents that were submitted in 2021:

- Completed Call for Sites form;
- Sketch layout plan;
- Transport Appraisal Report, dated February 2021.

A presentation was made to EDDC's Strategic Planning Committee on January 2022 on the merits of, and opportunities for, including this land as an employment land allocation in the new local plan. These are:

- The site is within single ownership, is available for development now and could be delivered quickly;
- This is an infill/rounding off site. The road to the west and north of the site would mark a clearly defined boundary to the employment development in this location;
- The site is not within any protective designation related to landscape character and any development would be viewed in the context Hill Barton Business Park to the east and Yeo Business Park to the north and, when built out, the employment development immediately to the south;
- There is an existing access to the site via Axehayes Lane, which has direct access to and from the A3052. There are opportunities to access the site directly from Axehayes Lane and through Hill Barton Business Park via Blackmore Road (via land in the owner's control) and there is also potential to form a pedestrian connection to the footway network within Hill Barton Business Park. Traffic impacts are predicted to be modest, even when combined with the already approved Hill Pond scheme.

In conclusion, there is insufficient evidence to inform the district's employment strategy at this time. It is crucial that the EDNA is completed and its findings and conclusions given proper consideration ahead of any finalising of strategic and non strategic employment policies. Ultimately, it is crucial that a sufficient supply of all types of employment land is made available across the district to facilitate business growth and allow for choice and flexibility in the local market, ensuring that businesses have a choice of possible sites to meet their current and future needs, local residents can work close to where they live and to make up for the significant shortfall that has been created.

Our client has questioned whether employment targets and delivery are being recorded and published. There is a significant imbalance between the supply/growth of housing and the supply/growth of employment space. The new local plan must be able to identify through its employment land targets and allocations where all the residents of the new housing being planned for will work.

7. Strategic Policy – Development Beyond Settlement Boundaries

Whilst it is important to protect the landscape, amenity and environmental qualities of the East Devon countryside, it is crucial that this is balanced against the needs of rural businesses and sensible and sensitive development must not be stifled by overly restrictive policies that do not allow windfall development to come forward and be judged on its own site-specific merits.

05 Future Growth and Development on the West Side of East Devon

8. Strategic Policy - Development of a second new town east of Exeter

The development of a second new town east of Exeter is a key element of the draft local plan's strategic approach. Three different options have been tabled.

Our client is of the opinion that existing settlements and the new town of Cranbrook should be improved and enhanced rather than creating a new settlement and that East Devon District Council must get all the basics sorted first, such as the imbalance between housing and employment land delivery, before looking to develop another new town.

09 Supporting Jobs and the Economy and Vibrant Town Centres

52. Employment development in the countryside

Our client supports the intensification of existing employment businesses in the countryside.

Draft policy 52 explicitly states that:

“For avoidance of doubt this policy applies to specific companies or businesses and their operational premises and is not applicable to business parks, industrial estates or similar where the business in question is the operation of that park or site.”

If that wording remains in the final version of the policy, then what opportunities will be provided in the new local plan for the expansion of existing employment sites? The draft policy wording does not reflect the supporting text (paragraph 9.22), which states 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.”

Development opportunities in the rural areas are more limited and the success of existing business parks and industrial estates and the potential for their future growth must not be curtailed by overly restrictive development management policies or by a local plan that is silent on matters of such importance to the local rural economy.

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- Completed Call for Sites form;
- Sketch layout plan;
- Transport Appraisal Report, dated February 2021.

On our client's behalf, we made a presentation to EDDC's Strategic Planning Committee on January 2022 on the merits of, and opportunities for, including this land as an employment land allocation in the new local plan. To help inform the future assessment of this potential employment allocation, the merits are re-iterated below.

- The site is within single ownership, is available for development now and could be delivered quickly;
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- The site is not within any protective designation related to landscape character and any development would be viewed in the context Hill Barton Business Park to the east and Yeo Business Park to the north and, when built out, the employment development immediately to the south;
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