

East Devon Local Plan – 2021 to 2040 - Issues and Options consultation for the attention of the Planning Policy team

We would encourage you to complete the on-line response form – see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Please only use this paper version of the questionnaire if you lack internet access. Receiving on-line submissions will help us save time and money and will mean we can be more accurate in our work.

Your Title	<input type="text"/>	First name or initial	<input type="text"/>	Surname	<input type="text"/>
		Your email address	<input type="text"/>		
		Your telephone number	<input type="text"/>		
		Your postal address and post code	<input type="text"/>		
		Organisation name (if relevant)	<input type="text"/>		
		If you are an agent acting for a client please provide the name of your client	<input type="text"/>		

Your Age Range

- 0-18
- 19-25
- 26-40
- 41-55
- 56-70
- 70 plus

In what capacity are you responding to this consultation - what most closely describes you or if you are an agent what best describes, in respect of this consultation, what your client does?

- Private individual
- Environmental body
- Government department or agency
- Local authority
- Parish or town council
- Politician
- Religious body
- Cultural group or body
- Education provider
- Amenity group
- Land owner
- Developer
- Private company
- Emergency service provide
- Utility or transport provider
- Community or resident group
- Representative of commercial organisation or business
- Other – Please specify (in the box below)

Guidance notes

We have produced a local plan issues and options consultation document that we are consulting on from 18 January 2021 to midday on 15 March 2021. In the consultation document we include a series of questions. Please note that this questionnaire should be read alongside the full consultation document.

Please respond to this consultation event, on-line, if possible, see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Paper copies of this completed of this questionnaire should be posted to:

Planning policy
East Devon District Council
Blackdown House, Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

To arrive no later than 12.00 noon on Monday 15 March 2021.

Data Protection

Any personal information which you provide will be held and used by East Devon District Council for the purpose of local plan production. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the relevant Privacy Notice which can be accessed at: <https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices>

Please note that responses received will not be treated as confidential and they will be published on our council web site along with your name and if relevant the name of the organisation you represent. If you are an agent your name and organisation will be published as well as those of your client. Postal or email address will not be published unless they are embedded in documentation and cannot be readily blacked out.

Question 1 - Local Plan Objectives

In paragraph 2.1 of the Issues and Options report we set out a series of suggested objectives for the future local plan that cover issues like climate change, meeting housing needs and supporting the economy. Question 1 seeks your views on these objectives.

Do you think these are the right objectives for the new local plan, are there any further objectives that you would wish to see added or amendments made?

- Yes, these are the right objectives
- No, there are further objectives or amendments I would like to add

Please give details

Question 2 – The scope of the local plan

In paragraph 2.2 of the Issues and Options report we propose producing a single plan, but it would be possible to produce a series of plans to cover the different issues. Do you think we should?

Which option do you think we should take?

- Option 1 - Single Plan.** Produce a single local plan covering all policy matters
- Option 2 - Multiple Plans.** Produce a plan that deals with strategic matters (the bigger stuff) first and then subsequent plans that deal with more local concerns and detailed matters later
- Option 3 - Other.** Do an alternative or neither of the above

Please provide any further comments in the box below

Question 3 - Neighbourhood Plans and the new Local Plan

Neighbourhood plans have been agreed for many of our neighbourhoods and more are in preparation. In paragraph 2.11 of the Issues and Options report we explain the role of neighbourhood and their relationship with the local plan.

How do you think we should make best use of existing neighbourhood plans to inform the new local plan that we are producing?

Question 4 - Planning for health and wellbeing

In Chapter 3 of the Issues and Options report we set out the health and wellbeing benefits of active lifestyles and the ways in which planning can promote this.

How important do you think it is that we should actively promote health and wellbeing throughout our new local plan?

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all

Please provide comments below on any health and planning matters you consider to be particularly important

Question 5 - Energy efficiency of new buildings

In paragraph 4.4 of the Issues and Options report we identify ways of reducing carbon emissions from new developments, including setting higher energy efficiency standards for new buildings. Do you think we should?

Do you think we should

- Option 1 - Plan for net-zero carbon from plan adoption.** This would require all new development to be net-zero carbon upon adoption of the plan. However, it would be at a cost and as a consequence we may see less affordable housing built and maybe fewer other social and community benefits from development
- Option 2 - Plan for net-zero carbon from a future date.** This would require all new development to achieve net zero carbon from a future date in the plan process. It could allow time for the development industry to adjust to the higher standards and may mean we can secure more affordable housing and community benefits from development
- Option 3 - Do neither of the above and not have a policy.** Under this option we could just wait for and apply any Government policy

Please provide any further comments

Question 6 - Provision of solar arrays/farms and windfarms

Paragraphs 4.5 to 4.7 of the Issues and Options report deals with maximising energy from renewable sources. Question 6 seeks your views on what level of support we should give.

Which option do you think we should take?

- Option 1 - Identify suitable areas for renewable energy developments
- Option 2 - Not identify areas but offer general support
- Option 3 - Take a restrictive approach to renewables
- Option 4 - None of these options

Please provide any further comments on wind farms and solar arrays/panels

Question 7 - Carbon saving measures

Paragraph 4.8 of the Issues and Options report sets out seven policy objectives for helping to achieve carbon neutrality including using 'waste heat', and promoting community led renewable energy schemes.

Do you think we have identified the appropriate carbon saving and related policy matters to be addressed in a new local plan and are there any other policy areas that you think we should be considering?

- Yes, the appropriate carbon saving policy matters have been addressed
- No, there are other policy areas that should be considered

Please give details

Question 8 - How many new homes should we plan for each year?

In Chapter 5 of the Issues and Options report we set out the current Government requirement for us to build at least 928 new homes a year (although this figure can change). Paragraph 5.4 explains that we would need to almost double the number of affordable homes (to 461 every year for the next 20 years) to meet current and future needs. Do you think we should?

Which option do you think we should take?

- Option 1 - Plan for an average of at least 928 new homes being built each year** – This would accommodate levels of house building that accord with current Government requirements. It may mean, however, that we fall a long way short of meeting all affordable housing needs.
- Option 2 - Plan for a greater number of homes, for example 1,200** – this may meet more of the affordable housing need but not all of it.
- Option 3 - Plan to build considerably more homes each year** - A figure of 1,614 homes would align with Governments previous thinking and would potentially result in all affordable housing needs being met.
- Option 4** - Select option 4 if you think none of the above are appropriate

Please provide any further comments and justification in the box below, especially if you think a different number of new homes being built each year is appropriate.

Question 9 - Sites for small scale housing developments

Paragraphs 5.5 to 5.7 of the Issues and Options report sets out Government policy that at least 10% of new homes should be built on smaller sites (below 1 hectare). This provides more opportunities for smaller, local businesses and is more likely to reflect local character than mass produced homes. Do you think we should?

Which option do you think we should take?

- Option 1 - Allocate or identify land for around 10% of homes to be on small sites** - this approach would meet minimum government standards.
- Option 2 - Allocate or identify land for around 11% to 25% of homes to be on small sites** - this approach would be higher than Government minimum standards.
- Option 3 - Allocate or identify land for 26% to 50% of homes to be on small sites** - this approach would be substantially higher than Government minimum standards.
- Option 4** - Allocate or identify land for 51% or more of homes to be on small sites - with such a high figure this approach could fundamentally change the nature of house building in East Devon.
- Option 5 - None of the above or an alternative**

Please provide any further comments in the box below

Question 10 - Planning for housing for people at all stages of their life

Paragraphs 5.8 and 5.9 of the Issues and Options report sets out the reasons for building a range of homes that can accommodate different circumstances. What approach should we take to encourage this, or is it not something the local plan should deal with?

Which option do you think we should take?

- Option 1 - We should explicitly require housing provision for people at all stages of life.** This approach could place demanding standards on developers to provide housing for all stages of people lives. It could though reduce monies available to pay for other wider community benefits from development.
- Option 2 - We should encourage but not require housing provision for people at all stages of life.** Under this approach we could encourage and support such housing but be less demanding on specific standards to be met.
- Option 3 - Not set standards for differing types of housing provision.** This approach would leave developers to determining the types of houses that should be built rather than policy seeking to require specific outcomes
- Option 4 - None of the above or an alternative**

Please provide any further comments in the box below on how we may best plan for housing for all.

Question 11 - Additional housing policy objectives

Paragraph 5.10 of the Issues and Options report identifies nine additional housing policy objectives, including encouraging more self-build homes, allocating sites for retirement housing and setting minimum space standards for new homes.

Do you think these are appropriate housing policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate housing policy areas to be addressed
- No, there are other major policy areas that should be addressed

Please give details

Question 12 - Preference for location for future job provision

Paragraphs 6.4 to 6.7 of the Issues and Options report explains why much recent employment development has occurred near to Exeter and where future job growth would best be located. We set out below a number of differing potential areas in East Devon that could accommodate future job growth and development. Please indicate your in principle levels of support for each option

12a - Continued focus on big employment sites in the West End of the District	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12c - Encouraging greater business development at and within the main towns of East Devon	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12d - Encouraging business expansion and development in the villages and across the countryside of East Devon	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12e - Encourage and enable more home working	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
If you have any comments on the above or alternative options please set these out below.	

Question 13 - Differing jobs sectors in East Devon

Paragraphs 6.8 to 6.10 of the Issues and Options report discuss what sort of jobs the local plan should encourage, including the opportunities to attract new and emerging sectors with highly skilled jobs. To what degree do you support, or not, the following approaches to future jobs or differing types of jobs?

13a - More jobs overall – with an emphasis on attracting new/larger employers and inward investment in any or all sectors	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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If you have any comments on the above or alternative options please set these out below.

Question 14 - Additional economic policy objectives

Paragraph 6.11 of the Issues and Options report identifies six areas where policies could be developed to help support the economy. These include promoting jobs close to where people live, encouraging people to patronise local businesses, supporting shared workspaces, allocating additional employment sites and links between economic development and developing a greener economy.

Do you think these are appropriate economic policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are the appropriate economic policy areas
- No, I think there are other policy areas that should be addressed

Please give details

Question 15 - Town centre uses

Chapter 7 of the Issues and Options report considers options for the roles of our town centres. Question 15 seeks your views on these options. We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate your in principle levels of support for each potential option or approach.

15a - Retail to dominate – support retail uses in town centres and if possible resist other uses.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15c - Redefine town centres to smaller core areas – concentration on retail and commercial uses in the core and allowing much greater flexibility for other uses in peripheral areas	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15e - Support community uses - promote more community spaces in town centres	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15f - Leisure uses – promote new gyms and sports facilities in town centres.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose

If you have any comments on the above or other distribution matters please set these out below

Question 16 - Additional town centre policy objectives

Paragraph 7.6 of the Issues and Options report identifies three additional area where policies may be appropriate including the use of vacant stories over shops, resisting ‘out of town’ uses to support town centres and producing town centre masterplans to identify key areas for improvement.

Do you think these are appropriate retail and town centre policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate policy areas
- No, there are other major policy areas that should be addressed

Please give details

Question 17 - Designing beautiful spaces and buildings

Chapter 8 of the Issues and Options report explains how attractive places can be planned and Question 17 seeks to find out how important you think it is that this is done.

How important do you think it is that we should actively plan to create beautiful spaces and buildings?

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all

Please provide comments below on design matters you consider to be particularly important. We would be especially interested in your views on whether we should include design codes in our future local plan for each allocated development site or whether we should make it simpler and just have general guidance.

Question 18 - Additional design policy objectives

Paragraph 8.8 of the Issues and Options report identifies two areas with the potential for additional policy work. These are encouraging innovative designs and incorporating wildlife friendly elements into developments.

Do you think these are appropriate design policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate housing policy areas
- No, there are other major policy areas that should be addressed

Please give details

Question 19 - The importance of conserving and enhancing heritage assets

Chapter 9 of the Issues and Options describes our heritage assets and sets out the positive impacts they can have on our quality of life and local economies.

Through a new local plan (and in the work of the council more generally) how important do you think it is that we should conserve and enhance our heritage assets?

- Absolutely essential
- Very important
- Quite important
- Not really of any importance

Please provide any further comments on heritage asset conservation and enhancement below including on any specific matters you think a new local plan should address.

Question 20 - Development in protected landscapes

Paragraphs 10.3 & 10.4 of the Issues and Options report sets out the importance of protecting our protected landscapes and the potential limitations this may place on how much and where development should be placed. Question 20 seeks views on the levels of restriction you favour.

In considering whether we should allow for development in protected landscapes do you think

- Option 1 - Place significant restrictions on development.** This approach would apply very tight constraints on development. However, it could mean more development pressure elsewhere in East Devon.
- Option 2 - Allow for development to meet local needs.** This would allow for limited development, specifically where it will meet smaller scale local social, housing or economic needs, it could still mean more development pressure elsewhere in East Devon.
- Option 3 - Allow for greater levels of development.** This approach would allow for much more development in protected landscapes, in so doing it could however reduce the need to build elsewhere.
- Option 4 - None of the above or an alternative**

Please provide any further comments in the box below

Question 21 - Net gains in biodiversity

Paragraphs 10.5 to 10.7 of the Issues and Options report explains the new approach of quantifying the potential impact of development on biodiversity to inform planning decisions and ensure that there is a 'net gain'. Question 21 seeks views on the approach you would favour to gain biodiversity improvements.

In order to gain biodiversity improvements which option would you prefer?

- Option 1 - On-site provision**
- Option 2 - Secure the habitats locally**
- Option 3 - Pay a cash tariff towards a strategic delivery scheme**
- Option 4 - A combination of the above**
- Option 5 - None of the above or an alternative**

Please provide any further comments in the box below

Question 22 - Additional natural environment policy objectives

Paragraph 10.8 of the Issues and Options report identifies 10 additional themes for the natural environment that may benefit from policies in the local plan.

Do you think these are appropriate natural environment policy issues to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are the appropriate natural environment policy issues
- No, there are other major policy areas that should be addressed

Please give details

Question 23 - Promoting accessibility by walking and cycling

Chapter 11 of the Issues and Options report sets out the issues for promoting sustainable transport. Question 23 seeks your views on how important you think it is that new development is sited so that it is within walking distance of services and facilities.

In order to promote walking and cycling and ensure that facilities are accessible we could adopt the possible approaches detailed below, which one would you favour?

- Option 1 - Focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services and facilities** - This will limit the potential location of new development and will require existing facilities and services to have the capacity to cope with extra customers/users
- Option 2 - Focus new development on a small number of growth areas where the large scale of development will support the delivery of new accessible services and facilities** - This may require very high levels of development to support facilities, which may overwhelm a small settlement.
- Option 3 - A combination of options 1 and 2** – This will enable some growth where existing facilities and services are accessible and have capacity with the remainder focused on growth areas to be developed with new services and facilities.
- Option 4 - Do not require facilities and services to be within walking or cycling distance of new development but require them to be available within the settlement** - This option would not require access by foot or cycle to facilities and services but would require them to be available locally. It may however encourage car use.
- Option 5 - None of the above** - Perhaps you think that accessibility by walking or cycling is not a relevant concern?

Please provide any further comments in the box below

Question 24 - Additional sustainable transport policy objectives

Paragraph 11.7 of the Issues and Options report identifies 13 key issues that may need to be considered around the theme of sustainable transport.

Do you think these are appropriate sustainable transport policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate sustainable transport policy areas
- No, there are other major policy areas that should be addressed

Please give details

Question 25 - Facilities and services that are important

Chapter 12 of the Issues and Options report deals with infrastructure requirements and asks what facilities are important to people to help us prioritise what may be needed and where. Please score the services and facilities listed below in accordance with their importance to where you live or would want to live

Please score the services and facilities listed below in accordance with their Importance to where you live or would want to live?	Please tick one box only for each item			
	Essential	Very Important	Quite Important	Of little Importance
Convenience store/Post Office	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supermarket	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare and nursery school provision	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Primary school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Secondary school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Children’s play area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sports & leisure facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health care facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Open spaces	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Easy access to a range of jobs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regular bus service (5 plus per day)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Train station	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paths for walking and cycling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Access to full fibre broadband	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public house	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Place of worship (e.g. a church)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High quality road links	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Emergency services (police, fire, ambulance)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community hall	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If you have any other comments or would identify other facilities please set these out below.				

Question 26 - Additional infrastructure and service provision policy objectives

Paragraph 12.9 of the Issues and Options report identifies five other infrastructure and service policy objectives.

Do you think these are appropriate infrastructure and service provision policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate policy areas to be addressed
- No, there are other major policy areas that should be addressed

Please give details

Question 27 - Retaining and refining the existing settlement hierarchy

Chapter 13 of the Issues and Options report considers strategic options for the distribution of new development expressed in terms of a settlement hierarchy. Question 27 seeks your views on what your preferred pattern of development would be.

Which of the following options do you prefer for a potential settlement hierarchy?

- Option 1** - Same hierarchy as current local plan: 7 Towns plus Cranbrook and the 15 Villages
- Option 2** - A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development
- Option 3** - A hierarchy that retains towns and Cranbrook but has a higher number of villages that may accommodate development
- Option 4** - Do something different in terms of a hierarchy or not have one

Please provide any comments below on the potential hierarchy, especially if you do not support the listed options.

Question 28 - Broad distribution of housing development

Paragraphs 13.12 to 13.14 of the Issues and Options report considers the strategic spatial options for accommodating housing growth. Question 28 asks which broad approach to the distribution of housing development you favour.

Which broad approach to the distribution of housing development would you favour in a new local plan?

- Option 1 - As existing.** Continue with a distribution pattern of planned new development that is in line with the current local plan – for 60% of new homes at the West End, 30% in Towns and 10% in Villages and rural areas
- Option 2 - More West End focused.** This approach would focus more of the future new house building close to Exeter, perhaps as much as 75%, with the remaining 25% being in town and villages (for example 20% in towns and 5% in villages).
- Option 3 - A less West End focused pattern.** This approach would seek to accommodate far less development close to Exeter, maybe as little as 20% of future new homes, with the bulk of new housing, 80% of provision, being dispersed across towns and villages (for example 50% in towns and 30% in villages and rural areas).
- Option 4 - An alternative to the above.** You may consider that there are different ways or approaches to look at development distribution (if so we would welcome your thoughts and comments)

Please provide any comments on the above in the space below

Question 29 - Future options for the type and location of development

Paragraphs 13.15 & 13.16 of the Issues and Options report sets out a range of option for accommodating development. Which do you prefer?

How do you feel about the development types and locations listed below	For each option please tick one box only					
	Strongly support	Support	Neither oppose or support	Oppose	Strongly oppose	None of the options
Infilling in towns and at larger villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building one or more additional new towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Planning for new villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
large scale (over 50 home)urban expansions to existing towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
small scale (under 50 home) urban expansions to towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building houses on the edges of East Devon villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Do you have any further observations on the alternative development options and approaches? Please provide comments below						

Question 30 - Establishment of a Development Corporation

Paragraphs 13.17 to 13.19 of the Issues and Options report explain the role that a development corporation could plan in delivering very large scale developments. Question 30 asks for view on how important you consider this would be.

If one or more big strategic sites for housing or mixed use development are allocated in the new East Devon local plan how important do you think the creation of a Development Corporation would be?

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all
- It would be a bad thing

Please provide any further comments below

Question 31 - Planning for development beyond 2040

Paragraph 13.20 of the Issues and Options report considers the timeframe that the local plan should consider.

Do you consider that it would be appropriate to start to plan for development in East Devon for a date well beyond 2040 in this Local Plan?

- Yes it would be very sensible whether a new town is proposed or not
- Sensible only if a new town is proposed
- It does not really matter what end date is set
- It would be undesirable and the end date should be 2040
- None of these options

Please provide any further comments below

Question 32 - And finally...?

Are there any big planning issues that you think we have missed in this report or are there any further comments you would like to make?

East Devon Local Plan Issues and Options Consultation

Savills on behalf of FWS Carter & Sons Limited



Introduction

- 1.1 The Greendale Business Park is home to a large number and range of businesses, providing employment for circa 1,600 people. Through incremental growth over a number of years it has become a major contributor to the East Devon economy and a significant source of Business Rates income for the Council.
- 1.2 Even during the difficult economic climate resulting from the COVID-19 pandemic the Business Park has continued to enjoy 100% occupancy (with the exception of one recent re-letting) and demand for expansion space from existing tenants. There remains a waiting list for space, particularly for compound areas and small to medium size buildings, as well as some larger warehouses.
- 1.3 This continued success and expression of confidence in the Business Park has been a catalyst for the owners – F W S Carter & Sons Limited – to investigate the potential for further future expansion. However, rather than approaching this in an incremental, *ad hoc* way, the owners have chosen to take stock of the current position and, through a systematic and robust analysis of environmental and landscape considerations, develop a 10–15-year Masterplan and a sustainable vision for the future of the Business Park. The Masterplan has now been completed and a copy submitted in support of the HEELA ‘call for sites’.
- 1.4 The implementation of the Masterplan would deliver a major boost to the East Devon economy in the long-term:
- creating an estimated 1,368 new permanent jobs;
 - generating circa £90m Gross Value Added, which represents a 3.5% growth on the current GVA in East Devon;
 - delivering an additional £2.3m in business rates, approximately half of which would go to the authority to support local priorities;

- rebalancing the employment market, diluting the reliance placed upon the service industry and boosting average wages;
 - addressing unemployment; and
 - reducing out-commuting from the authority to employment in Exeter and elsewhere.
- 1.5 We believe that through the environmental and landscape-led masterplanning of the Business Park we have demonstrated how these considerable economic benefits can be delivered in a manner which would not have a detrimental impact on the environment.
- 1.6 The Masterplan and long-term vision for the Business Park is not solely concerned with mitigating the impact of expansion; it provides an opportunity to take stock of the existing environment and incorporate measures designed to enhance the Business Park as a whole for the benefit of both the current and potential future tenants. These enhancement measures would achieve a minimum 10% net gain in biodiversity and deliver substantial areas of woodland planting.
- 1.7 Finally, given the importance placed upon climate change by EDDC and the recognised need to support sustainable development opportunities, it should be noted that at present the entire energy demands of the Business Park are provided from 100% renewable electricity generated by the on-site anaerobic digestion plant. There is potential to increase the electricity drawn from the plant to meet the electricity demands of the expansion area and therefore deliver the increased employment through 100% renewable energy.
- 1.8 For this and other reasons explained throughout these representations and within the 'call for sites' submission, we consider the proposed expansion of the Greendale Business Park represents a highly sustainable and sound means of delivering economic growth and new jobs in East Devon.

The East Devon Local Plan

- 1.9 In preparing the representations we have reviewed in detail the Issues and Options consultation document. The consultation document is extremely well written, incorporates what we believe to

be exactly the right level of detail for a Regulation 18 consultation and asks insightful questions to help guide the preparation of the Local Plan.

- 1.10 Within this submission we have responded directly to the questions proposed and, where relevant, have taken the opportunity to provide information specifically relating to the proposed expansion of the Greendale Business Park.
- 1.11 In addition to these representations, we have also responded to the separate HEELA 'call for sites' with information specific to the Greendale Business Park proposals. The submission summarises the extensive and detailed evidence base that has been prepared covering all relevant technical and environmental matters including ecology, heritage, landscape, mobility and flood risk & drainage. Submitted in support of the 'call for sites' form is the 'Greendale Business Park Strategic Masterplan' (December 2020). This Masterplan explains how the proposals have come together and the benefits that could be delivered should an expansion of the Business Park be included as an allocation in the Local Plan
- 1.12 We hope that this consultation provides a catalyst for engagement on the opportunity at Greendale and would welcome further dialogue with officers and members on the potential for the site to deliver a significant proportion of the authority's future economic growth needs.

Key Issues and Potential Priorities

Question 1 - Local Plan Objectives

- 2.1 We broadly support the ten objectives for the new Local Plan set out in the table under paragraph 2.1, in particular Objective 4 - 'Supporting jobs and the economy'.
- 2.2 It is absolutely right that a core objective of the new local plan should be to *“support business investment and job creation opportunities within East Devon and support a resilient economy”*. This objective is arguably even more important in the current economic climate than it has been historically. The pandemic has had a devastating impact upon many sectors of the economy, but few have been as hard-hit as 'accommodation and food service'. This has had a disproportionate impact upon East Devon where the economic evidence from the Economic Development Needs Assessment (EDNA) indicates that there is a significantly higher than average concentration of such employment within the authority¹.
- 2.3 In contrast, other sectors, notably transportation and storage, have proved to be far more resilient. Indeed, elements of the sector have seen substantial growth with changes to consumer habits including the rapid acceleration of online retailing.
- 2.4 In support of achieving this objective the policies of the new Local Plan should broadly encourage a wide range of economic growth and investment. Included within these policies should be specific support for the expansion of existing employment areas to enable successful businesses and locations to grow and evolve as market-led opportunities arise.

Question 2 - The scope of the Local Plan

- 2.5 We entirely agree that it would be preferable to produce a single local plan for East Devon rather than a series of separate plans. There are many benefits to such an approach including, most notably, simplicity and consistency.

¹ Hardisty Jones, March 2017, page 17.

Question 5 - Energy efficiency of new buildings

- 2.6 We entirely agree that climate change is one of, if not the biggest threats facing humanity and that East Devon should play its part in tackling the 'climate emergency'. The challenge for East Devon, which is the same as the challenge for all authority areas across the UK, is balancing the response to the climate emergency with housing and economic growth proposals which continue to meet needs over the long-term. This is not just about viability, although viability is an important consideration, but it also needs to take into account supply chains and the availability of new technologies which will enable the transition to zero carbon development.
- 2.7 The Greendale Business Park is well placed to meet the challenges of climate change. Presently all of the electricity demand from the circa 100 businesses located within the Business Park is provided by renewable energy generated from the on-site anaerobic digestion plant. The plant takes waste product from the dairy farm and combines this with energy crop to feed two electricity turbines, one of which provides a direct supply to the Business Park, whilst the other feeds into the National Grid.
- 2.8 As part of the expansion of the Business Park there is potential for further renewable electricity from the anaerobic digestion plant to be directed to the new units. There may also be an opportunity to install photovoltaics on future buildings or incorporate new renewable technologies into the expansion area.
- 2.9 Whilst the Greendale Business Park is well placed to deliver sustainable employment growth, this will not be the case for all development opportunities across the authority area. In direct response to this question we therefore consider that Option 2 represents the most appropriate and balanced response.

Question 7 - Carbon saving measures

- 2.10 Paragraph 4.8 contains a number of emerging themes and potential policy areas which could be incorporated into the Local Plan to deliver carbon savings. Some of the measures proposed are based upon existing and operating technologies whilst others are in their infancy. No doubt

before the plan is adopted there will be further new technological advances on the horizon.

- 2.11 Since the technology in this field is developing at such a great pace it is crucial that the policy approach is flexible in order to avoid it becoming rapidly out of date. Rather than specify particular technological solutions, we would endorse a policy approach, which establishes a target, and that the means of achieving the target is addressed through the planning application process.

Question 12 - Preference for location for future job provision

- 2.12 Before responding directly to the question posed, we first set the context for jobs and the economy in East Devon.
- 2.13 Businesses choose to locate their premises based upon a number of factors that are specific to their operations. One factor which is common to many is accessibility and, to be more precise, accessibility to the strategic road network. Of particular importance in East Devon is the M5 motorway and the fast connection is that this provides north and south of Exeter. This, we contend, is arguably of equal, if not greater, importance for businesses than the proximity of Exeter city.
- 2.14 East Devon is not alone in having good access to the M5. Indeed there are locations not only in the other Devon authorities but also north within Somerset which can offer such opportunities. It is important to consider the alternative spatial strategy options presented in Question 12 within this wider context. Indeed, for the employment strategy to be successful and result in the creation of new jobs within East Devon, it must provide commercially attractive opportunities to the market having regard to all of the potential employment destinations within the functioning economic area. In other words, if the employment strategy within East Devon is not attractive to businesses then they will simply locate outside of the authority area.
- 2.15 Access to the strategic road network, and in particular the M5, is also likely to be a major contributing factor to the limited employment growth on allocated employment sites at the main

towns in East Devon². Whilst we recognise the positive moves of the authority to unblock barriers to investment, many fundamental challenges remain. The strategy established in the Local Plan must be realistic and deliverable having regard to these locational considerations.

- 2.16 The Consultation Document also rightly highlights the economic challenges arising from the Covid-19 pandemic. As noted in the report to Cabinet on 28 October 2020 entitled ‘Covid-19 Economic Response and Recovery’, *“the economic impact of the pandemic on the District has been profound. Vulnerabilities have been ruthlessly exposed and the scale of job losses has been unprecedented. The potential for further large-scale redundancies is very real”* (paragraph 8.1).
- 2.17 The Report also summarises the output of economic modelling commissioned by the County Council to understand the potential impact of the pandemic. Paragraph 1.3 states that *“whilst the most optimistic of these [economic scenarios] anticipates a return to 2019 levels of employment and productivity in 2022, more pessimistic scenarios indicate that a return to pre-Covid-19 levels of performance is unlikely until 2027 and that employment rates will not recover until 2030 without significant investment between local partners and Government”*. It further highlights the particular challenges facing East Devon where the unemployment rate has increased from below 2% to nearly 5% with specific sectors such as hospitality and leisure having been particularly hard hit.
- 2.18 Whilst there remains a great deal of uncertainty, the likelihood is that there are implications for certain sectors of the East Devon economy which will be structural and long-term. For example, there is little doubt that there will be an increase in the number of people working from home on both a part-time and full-time basis. In addition, the acceleration of pre-existing trends in retail are unlikely to be reversed once the pandemic has passed, with an increasing proportion of shopping being undertaken online in the future.
- 2.19 It is this backdrop within which the economic policies of the new Local Plan must be prepared and why we strongly encourage the authority to adopt an explicitly pro-growth/recovery approach to the policies of the plan which create an attractive environment for new businesses to locate in

² See paragraph 6.6 of the consultation document.

East Devon and for existing businesses to expand.

2.20 Within the context set out above we comment upon each of the five options presented in the question and explain our reasons for opposing or supporting each of them.

1. Continued focus on big employment sites in the West End of the District

2.21 We do not oppose the principle of large employment sites in the West End of the District forming part of the economic strategy. Indeed, the location of Sky Park, the Airport Business Park and Exeter Science Park are well placed to deliver a range of employment opportunities from large format warehousing to commercial research and development. There is however a considerable amount of existing allocated land within this area which has yet to be developed and whilst this area is appropriate for employment use, it is our view that the focus should be upon delivering the existing allocations as opposed to adding additional opportunities at this stage. For that reason, we neither oppose no support this option.

2. Encouraging greater business development in other areas close to Exeter

2.22 We strongly support the option of encouraging business development in locations close to Exeter such as the Greendale and Hill Barton Business Parks. As established locations, the two Business Parks identified as examples are home to many businesses and provide employment for a substantial number of East Devon residents.

2.23 The Greendale Business Park for example currently accommodates circa 100 businesses which collectively employ approximately 1,600 people. These businesses range considerably in terms of scale, number of employees and operation. The primary sectors are manufacturing, construction and storage & distribution, though the businesses employ a wide range of managerial, administrative and operational jobs.

2.24 Of particular importance, given the context set out above, is that employment within the Business Park has been remarkably resilient during the pandemic. Indeed, not one of the businesses located at Greendale has ceased trading on a permanent basis as a consequence of the pandemic.

- 2.25 Unlike other prominent sectors of the economy in East Devon, many businesses at the Greendale Business Park have not only survived, but in some cases thrived, during the recent economic challenges. Indeed, the owners of the Business Park have in fact received a large number of enquiries from existing tenants seeking to expand their operation and new businesses looking to locate their operation at Greendale over the course of the past 6-9 months.
- 2.26 A supportive planning framework within the new Local Plan which enabled appropriate and controlled growth of the Business Park would likely yield significant results, providing a range of new employment opportunities for the residents of East Devon at a time when many, particularly the young, find themselves out of work.
- 2.27 A key consideration for this, and the other economic strategy options, is whether the employment growth is deliverable within environmental limits and, if so, what scale of growth could be accommodated. In order to answer these important questions, we draw reference to the Masterplan document submitted alongside the HEELA 'call for sites'.
- 2.28 This environmental and landscape-led assessment produced a masterplan which demonstrates that there is potential to deliver up to 20.5 hectares of employment land adjacent to the Business Park over the long-term. Alongside this new potential employment land there would be significant areas for strategic landscaping and ecological enhancement. Indeed, should the proposal be supported, the landowners will be willing to commit to deliver in excess of 10% biodiversity net gain.
- 2.29 On the basis of the evidence produced, we can say with considerable confidence that a policy framework which supports the expansion of the Greendale Business Park would:
- represent a deliverable and achievable strategy; and
 - Provide an immediate boost to the local economy in a location where there is proven demand for economic growth.

3. Encouraging greater business development at and within the main towns of East Devon

2.30 We appreciate that there may be good planning reasons why, in theory at least, it would be beneficial to have increased levels of employment at and within the main towns of East Devon. However, we would question whether such a strategy is deliverable.

2.31 As paragraph 6.6 of the Consultation Document acknowledges, there has been limited progress on the delivery of the existing allocated employment sites at the main towns since the adoption of the Local Plan in 2016. Given the length of time that has passed since these allocations were made, this suggests that there are significant challenges either with the physical delivery of the sites or there is insufficient market demand.

2.32 Rather than exacerbate the situation, we would encourage the authority to continue to work with the owners of these allocated sites in order to encourage their development. Until they have been delivered however we oppose the allocation of further land at the main towns.

4. Encouraging business expansion and development in the villages and across the countryside of East Devon

2.33 Many of the villages in East Devon have a relatively small population and only a limited level of services and facilities available. A large number are also within the protected landscape of the AONB, while others are accessible only by minor roads. A strategy based upon a wide dispersal of employment across the authority area would likely therefore meet many deliverability challenges including not only planning and environmental constraints but also limited market demand.

2.34 There may be certain villages where opportunities exist that are demonstrably deliverable and in those instances there may be merit in small-scale employment allocations. However, at the vast majority of villages across East Devon we considered this is unlikely to be the case. For this reason we 'oppose' this option.

5. *Encourage and enable more home working*

2.35 Most commentators believe that the increase in home working which has taken place during lockdown is likely to remain a feature of future working patterns. Whilst the extent of home working is likely to reduce when lockdown ends and offices reopen, many employees will continue to work from home for part of their contracted hours. The ability to work from home (including, most notably, the availability of superfast broadband) and the space within accommodation to do so are likely to be high on the list of requirements for many future house purchasers. In order to encourage and enable more homeworking, an objective we strongly support, we would therefore urge the authority to attach substantial weight to locations for housing development which benefit from connectivity to superfast broadband.

Conclusion

2.36 In conclusion, there is no one option which could, or indeed should, be the sole focus for economic growth in the new East Devon Local Plan. We strongly encourage the authority to take a very positive and proactive approach to economic growth. In so doing, it should focus additional growth at locations where there is current and demonstrable demand yet a shortfall in deliverable employment land supply. Such a strategy would support a quick recovery from the current economic challenges that have arisen as a result of the pandemic; increasing the number of jobs within the growing and more resilient sectors of the economy.

2.37 The Greendale Business Park is capable of delivering significant employment growth and with it a large number of new jobs, increased Business Rate receipts for the authority and a boost to GVA. In pursuing this option, we would welcome the opportunity to meet with officers and members in order to explain the opportunities that exist and the benefits that could arise from such a strategy.

Question 13 – Differing jobs sectors in East Devon

2.38 In the context section above we outline the profound economic impacts that have shaken the local economy. The rise in unemployment, particularly amongst young people is having a

devastating effect upon lives and livelihoods. Whilst we recognise the long-term ambitions of the authority to boost wages through the addition of higher value jobs within East Devon, in the short to medium term we believe a broad economic strategy should be pursued which promotes growth and new job opportunities across all sectors.

- 2.39 Through this Local Plan a demonstrably positive and supportive policy framework should be put in place which will enable growth not only in the ‘transformational sectors’ listed under paragraph 6.9 but also across a wide range of traditional sectors from manufacturing to construction and agriculture etc. For that reason we strongly support all four of the options listed under Question 13 and urged the authority to develop a policy framework which will help achieve growth and success across each of these four ‘options’.

Question 19 - The importance of conserving and enhancing heritage assets

- 2.40 The conservation and enhancement of heritage assets is a subject which benefits from its own dedicated section within the NPPF. Section 16 of the NPPF establishes a framework within which identified thresholds of harm are attributed degrees of weight in the decision-making process on planning applications. There is also a separate statutory duty upon local authorities prescribed in Section 66 of the Listed Buildings and Conservation Areas Act 1990.
- 2.41 This well trodden legal and policy framework has been tested through the courts and is well understood by practitioners. In developing policies related to the Historic Environment, we strongly urge the authority to closely follow this legal and policy framework to (a) ensure that the plan is consistent with national policy and therefore found sound, and (b) avoid any confusion or uncertainty.
- 2.42 A heritage assessment of the land around the Greendale Business Park has been undertaken by Cotswold Archaeology to inform the masterplanning process. This baseline analysis fed into the assessment of the opportunities for expansion. As a consequence there would be no detrimental impact on heritage assets as a consequence of the proposals contained within the masterplan.

Question 20 - Development in protected landscapes

- 2.43 We entirely agree with the context set out at the beginning of Chapter 10. East Devon is blessed with vast areas of outstanding countryside and coastal environments, which are rightly designated and protected through the planning system.
- 2.44 Whilst we do not believe that these designations should place an absolute moratorium upon development within protected areas, they must be afforded a very significant level of protection. As recognised under Option 1, this would indeed increase development pressure elsewhere within East Devon, however, since the areas where the pressure would be increased are the most sustainable within the authority, we do not consider this to be objectionable.
- 2.45 The expansion proposals for the Greendale Business Park have been prepared with a thorough understanding of the landscape and the potential visibility of development. Detailed landscape and visual impact techniques were employed to assess the theoretical visibility of different parts of the land from key viewpoints in the AONB. This approach led to the definition of development parcels and proposed maximum building heights designed purposefully to ensure there would be no adverse visual impact from the protected landscape.

Question 21 – Net gains in biodiversity

- 2.46 It is the Government's intention to pass legislation through the Environment Act to make it mandatory for all developments to achieve a net gain in biodiversity.
- 2.47 The strong preference is for the biodiversity enhancement to be delivered on-site and therefore as part of the development proposals. It is however recognise that in certain instances this will not be possible and that offsite and/or strategic enhancement schemes will be required to achieve this objective. In practical terms therefore, Option 4 is the only realistic solution albeit there should be a strong preference for on-site enhancement.
- 2.48 There is an opportunity through the plan-making process to allocate land which it is recognised at the outset can achieve, and in some instances exceed, this objective. We urge the authority to

have regard to the potential for biodiversity enhancement in selecting its preferred sites for meeting future housing and employment needs.

- 2.49 Insofar as the Greendale Business Park is concerned, there is an opportunity to incorporate a substantial area of new habitat within the masterplan area and as part of the expansion proposals the owners are committed to delivering significant biodiversity enhancement. Further details are provided in the appended masterplan document.

Question 25 - Facilities and services that are important

- 2.50 Paragraphs 12.6 and 12.7 of the context for this Question outline the importance of digital communications. Question 25 then asks how important “full fibre” broadband is to future residents. We suspect that in the current climate and with the surge in home working, online shopping, video streaming and socialising, and general communications, there is going to be a large number of respondents who tick the ‘essential’ box for this line.
- 2.51 Whilst this question is concerned with residents and not employees, access to full fibre broadband has become increasingly important for employers also. With a greater amount of communication moving on line, we would expect this to continue after the restrictions imposed as a result of the pandemic have been lifted. Accessibility to digital communications should therefore be afforded substantial weight in determining the most appropriate locations for major employment growth.

Question 28 - Broad distribution of housing development

- 2.52 Whilst Question 28 is primarily concerned with residential development, a sustainable distribution of development requires that the housing and economic growth strategies of the Plan to complement one another.
- 2.53 We consider the most sustainable and deliverable strategy to be one which focuses growth within the western part of the authority area where there is good strategic access (Option 4). As the context to this question explains at paragraph 13.13, “such an option would benefit from proximity to the existing jobs and services in Exeter, it should minimise need for travel, whilst avoiding

environmental constraints in other parts of East Devon". For these and other reasons, it is our view that a broadly defined 'West End' (i.e. beyond the current areas of Cranbrook and Skypark etc) represents the most sustainable strategy available for the Local Plan.

- 2.54 Furthermore, as we have explained elsewhere within these representations, the western part of the authority area is far better connected to the strategic road network and is therefore considerably more likely to attract inward investment. There is a clear logic to maximising the deliverable opportunities available in this area for employment growth as otherwise this will take place in other local authority areas where opportunities are available. In broad strategic terms, there is a logic to directing the majority of housing growth also to the western part of the authority area as this will minimise commuting and support active travel movements.

Greendale
BUSINESS PARK

GREENDALE BUSINESS PARK

Strategic Masterplan / December 2020



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

CONSULTANT TEAM



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Ecologist:
Green Ecology



EXECUTIVE SUMMARY

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

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

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

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

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

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

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

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

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

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



INTRODUCTION

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

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

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

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

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

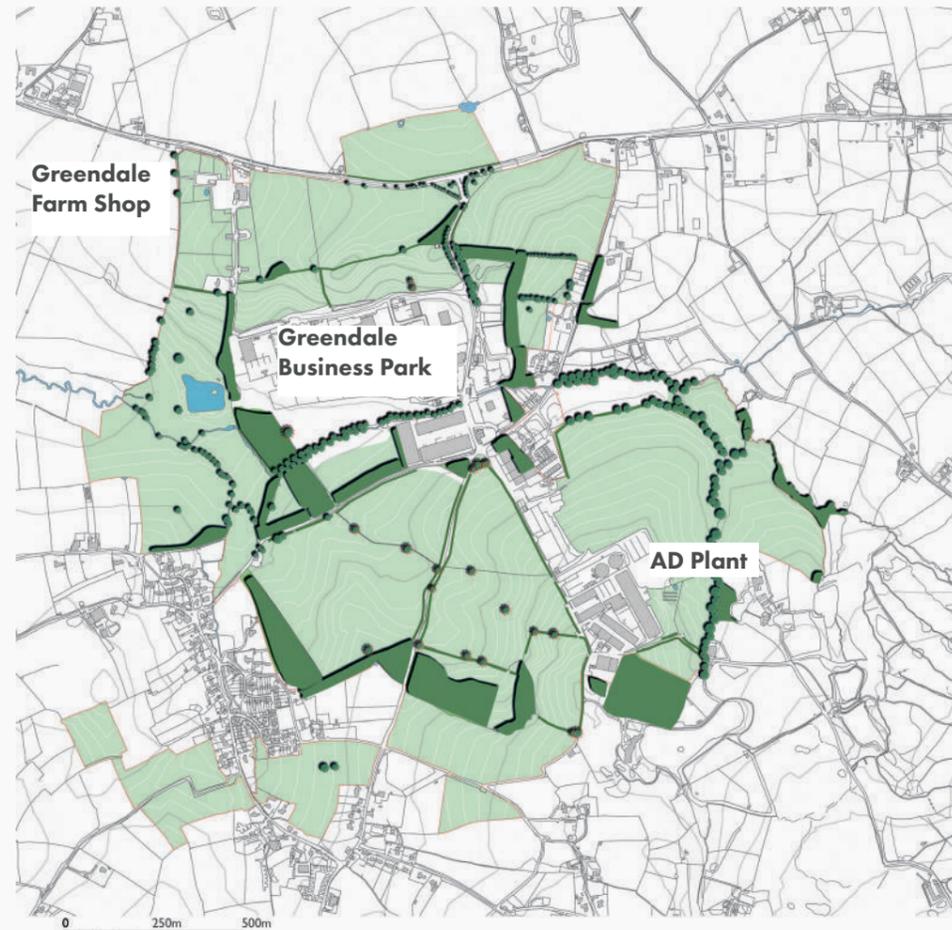


LOCATION

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

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

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

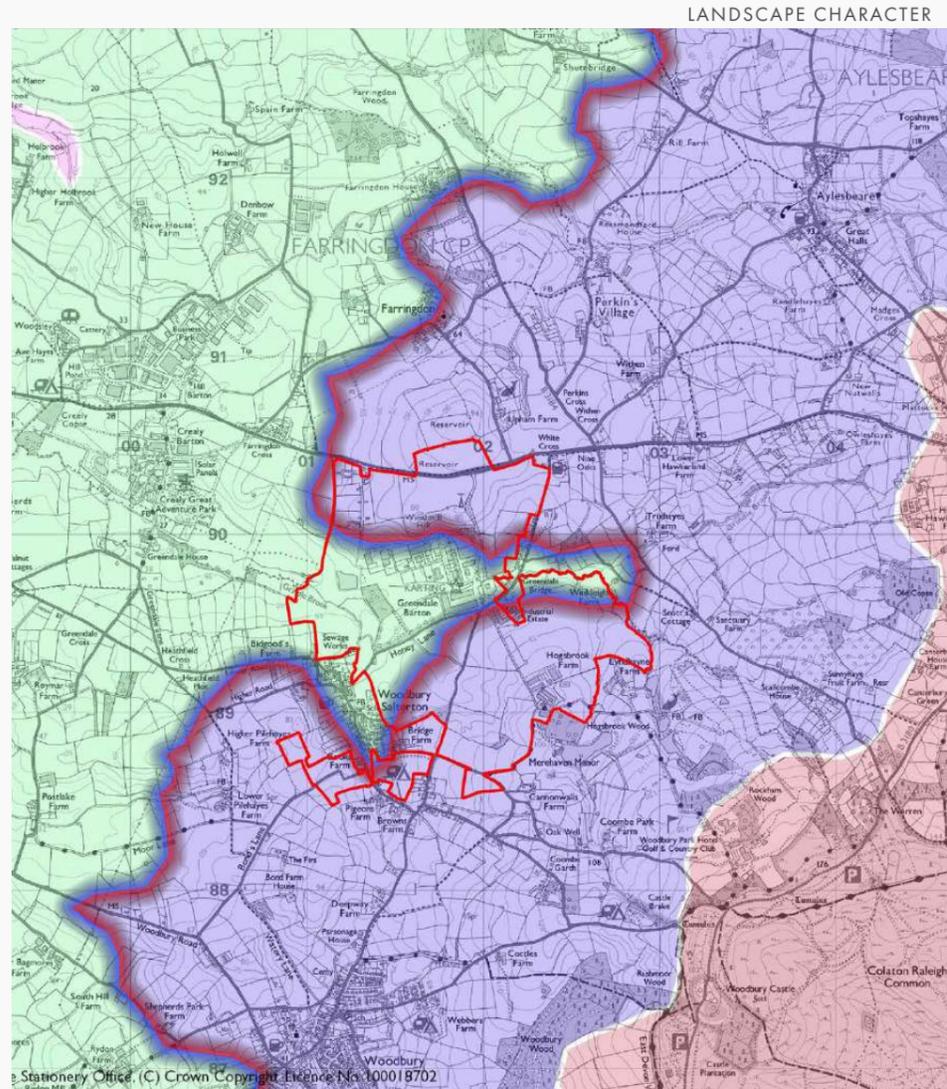


SITE LOCATION



SITE LOCATION IN CONTEXT OF SOUTH DEVON

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



BASELINE CONDITIONS

3.1 Landscape and Visual Appraisal

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

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

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

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

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

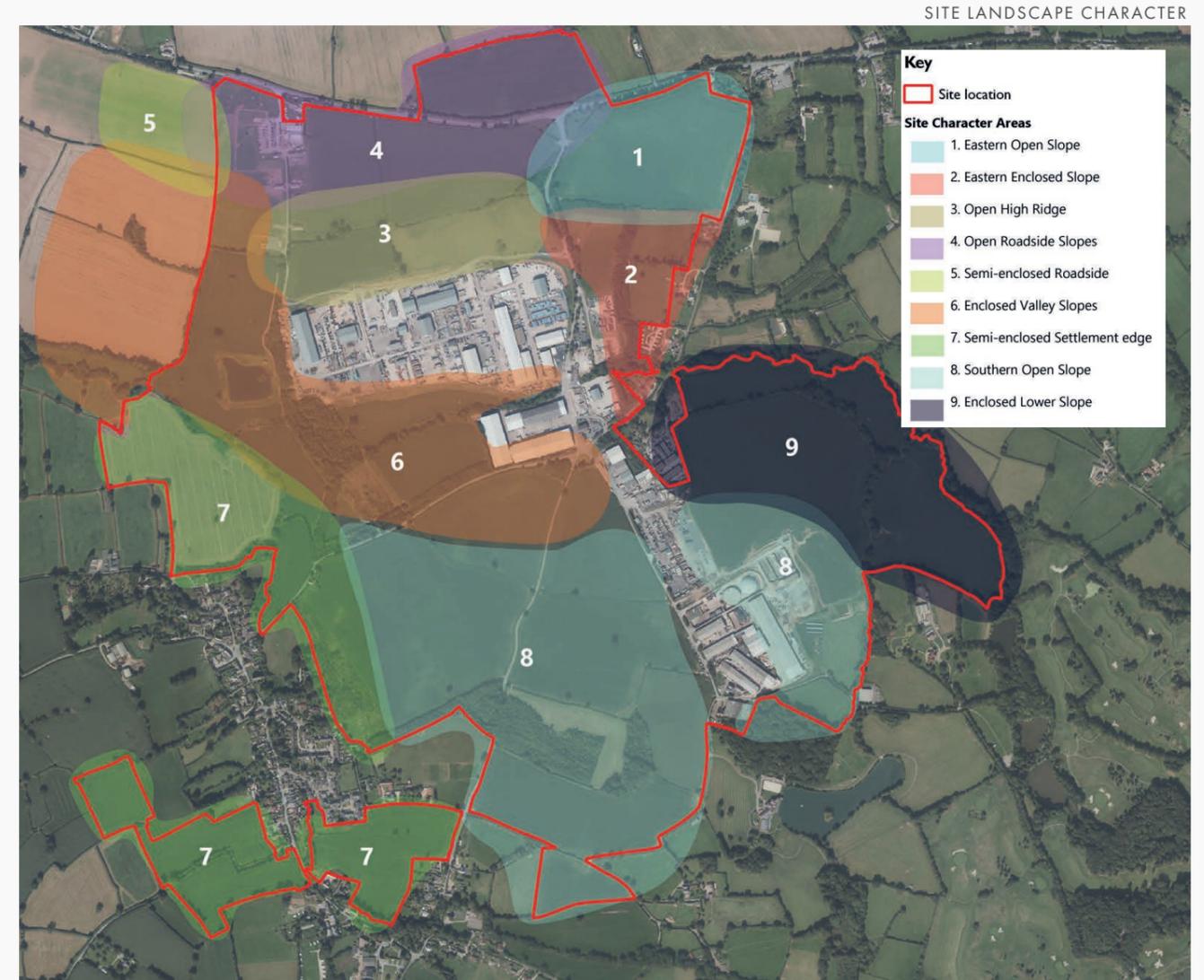
The East Devon Area of Outstanding Natural Beauty (AONB) is located approximately 1km to the south-east of the Site, at the nearest point.

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

the Site fall within the Clyst Lowland Farmlands LCA.

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

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

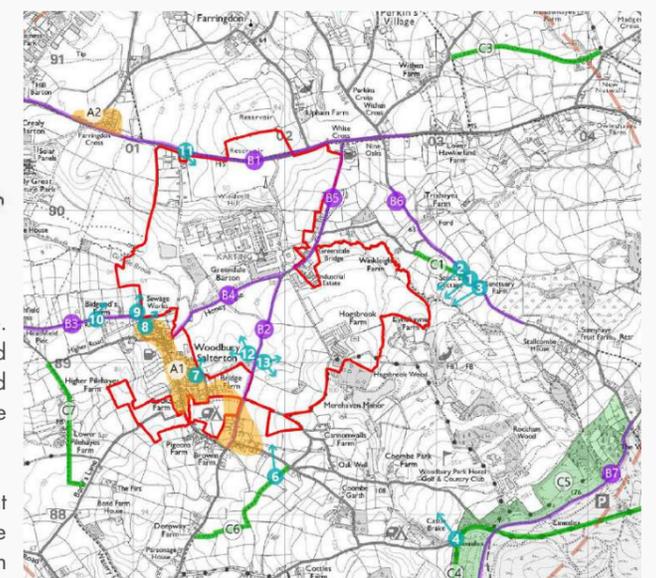


Visibility of the Site from the surrounding area is generally limited due to topography and intervening hedgerows, tree belts and woodlands.

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

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

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



VISUAL RECEPTOR GROUPS AND RESPECTIVE VIEWPOINT LOCATIONS



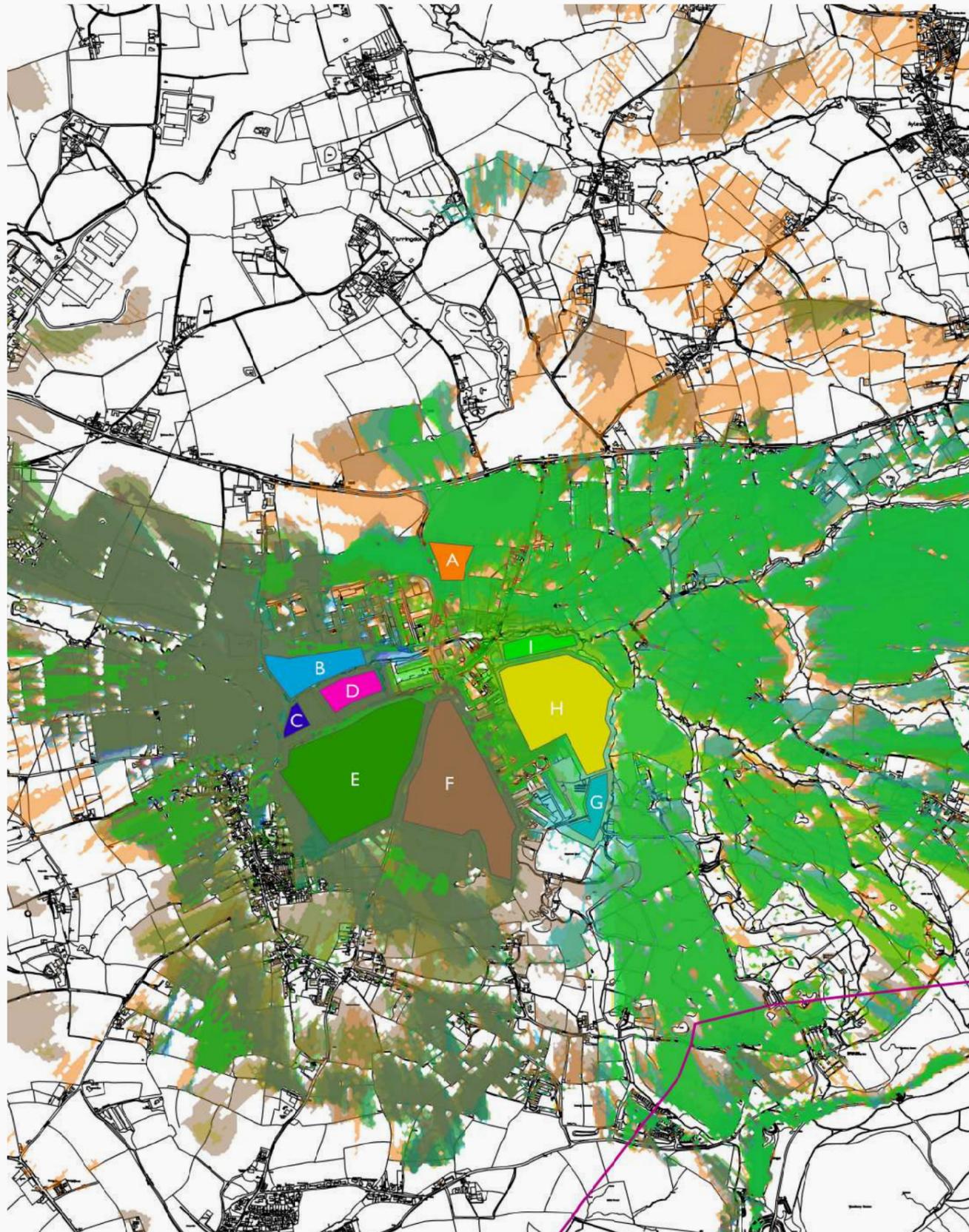
VIEWPOINT 10: View for Lower Road, looking North to North East towards Greendale Business Park



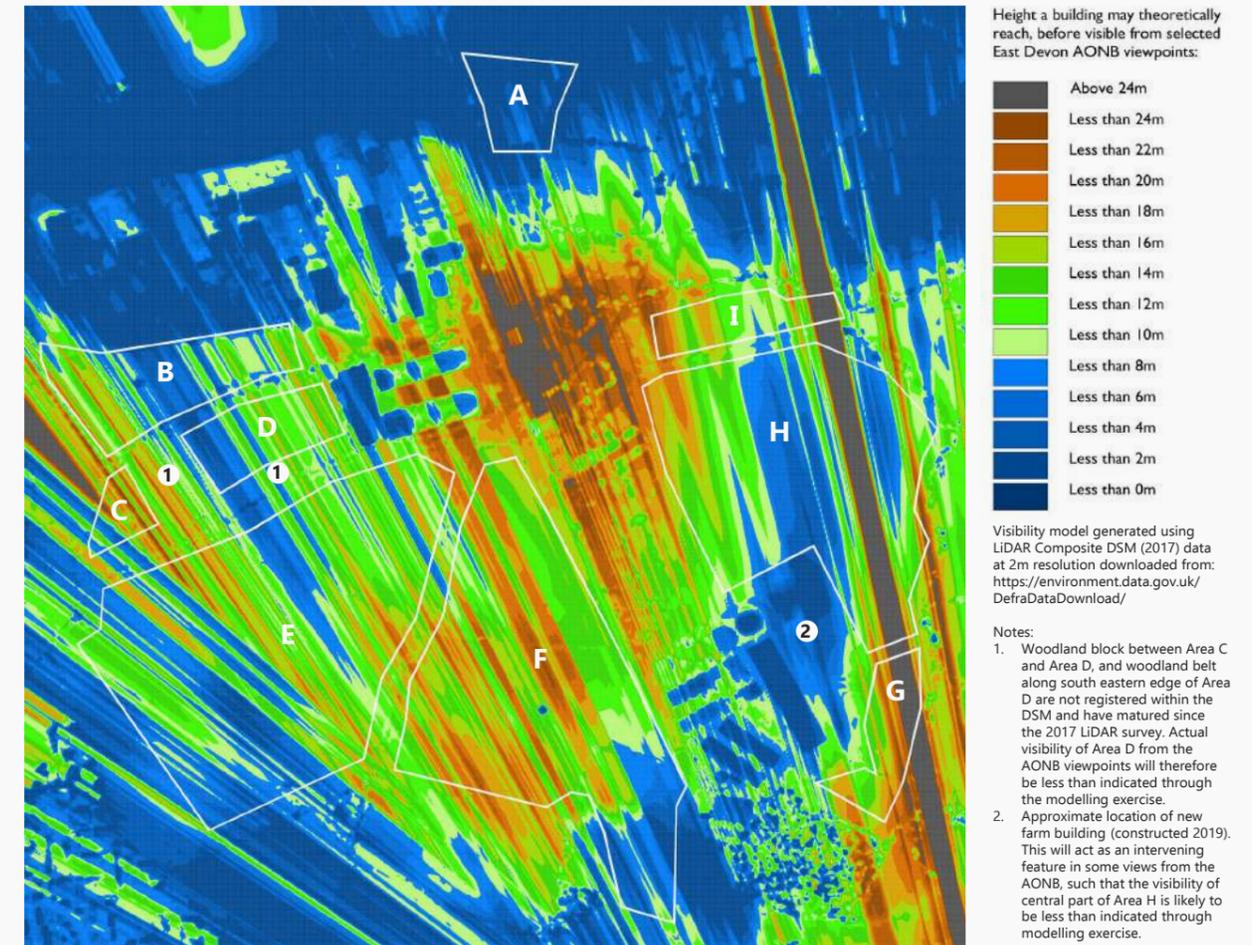
VIEWPOINT 5: Woodbury Common at Western edge of Woodbury Castle car park, looking North



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



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



VISUAL CONSTRAINTS TESTING FROM AONB VIEWPOINTS

3.2 Landscape Capacity Study

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

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

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

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

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

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

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

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

3.3 Ecological Baseline

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

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

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

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

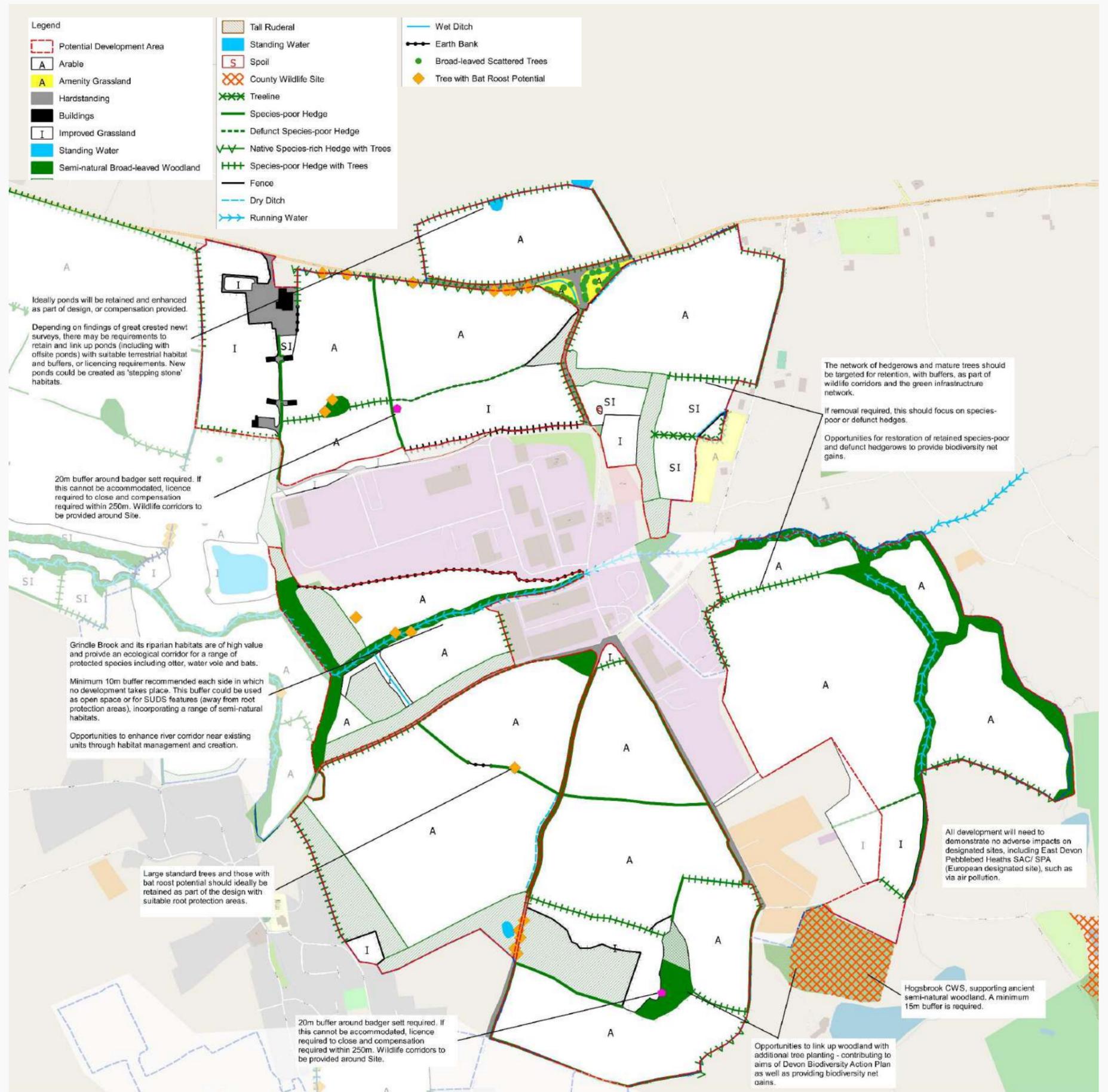
- Bat activity, including checks of tree for roosting potential
- Riparian mammals (otter and water vole)

- Breeding birds
- Dormouse
- Great crested newt
- Badger

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

The overarching ecological objectives for the design will be to:

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



ECOLOGICAL CONSTRAINTS AND OPPORTUNITIES PLAN

3.4 Transport and Access

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

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

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

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

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

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



3.5 Flood Risk and Surface Water Drainage

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

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

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

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

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

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

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

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



3. BASELINE CONDITIONS

3.6 Opportunities and Constraints

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

1. Site Visibility

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

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

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

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

2. Landscape

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

3. Site Ecology

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

4. Flood Risk and Surface Water Drainage

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

5. Transport and Access

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



OPPORTUNITIES AND CONSTRAINTS PLAN



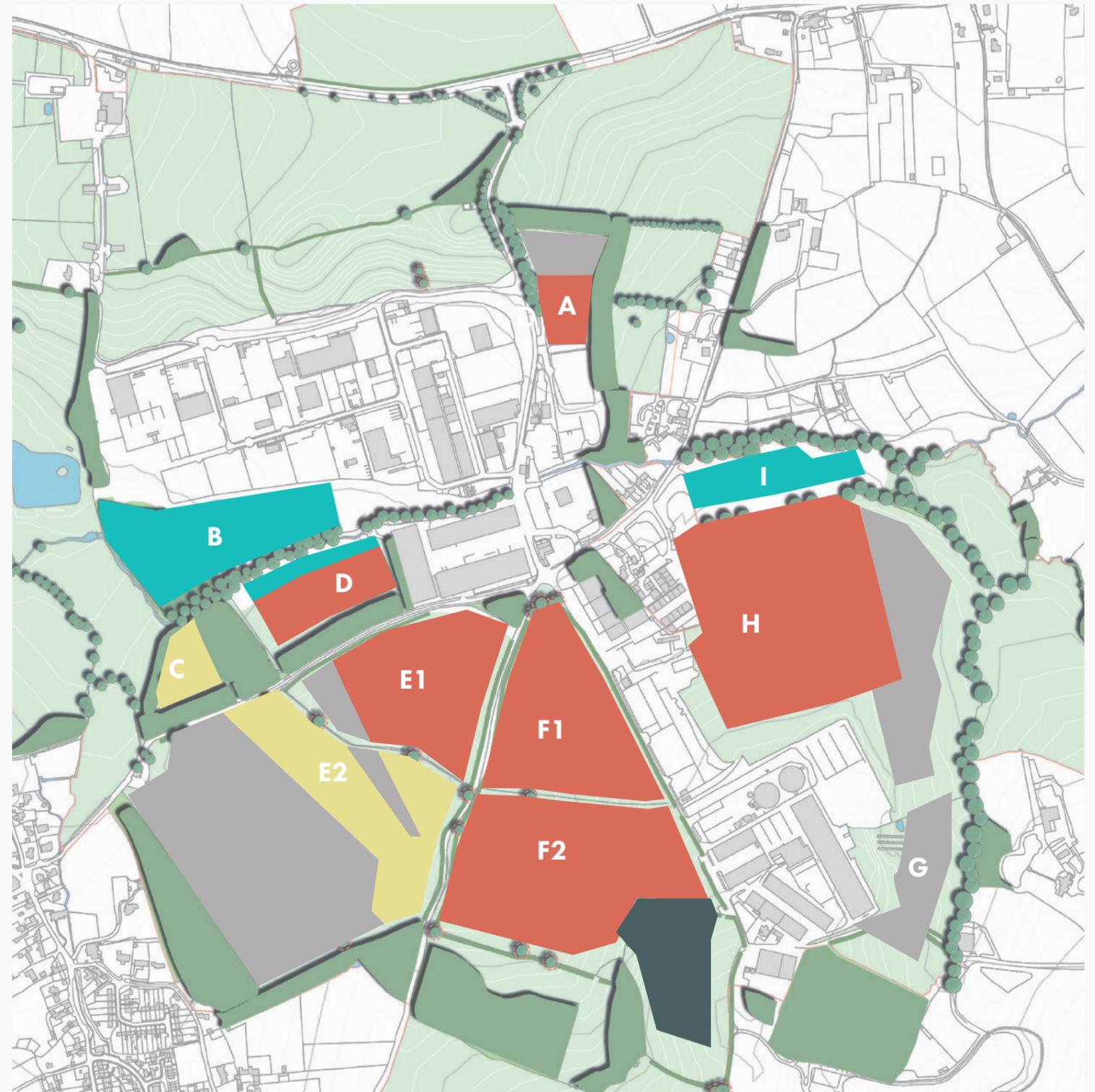
MASTERPLAN DEVELOPMENT

4.1 Selection of suitable Areas for future development

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

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

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



AREAS SUITABLE FOR FUTURE DEVELOPMENT





PROPOSED DRAINAGE PLAN

4.2 Proposed Drainage Strategy

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

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

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

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

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

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

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

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

4. MASTERPLAN DEVELOPMENT

4.3 Proposed Access Strategy

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

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

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

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

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

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



PROPOSED ACCESS PLAN

- Existing public road running through Site
- Existing Private Road Running through Site
- Proposed Vehicle Connection
- Section to be closed and diverted
- Proposed Realignment of Honey Lane
- Upgraded Private Road
- Proposed revised bus route
- Proposed pedestrian and cycle
- Proposed new roundabout

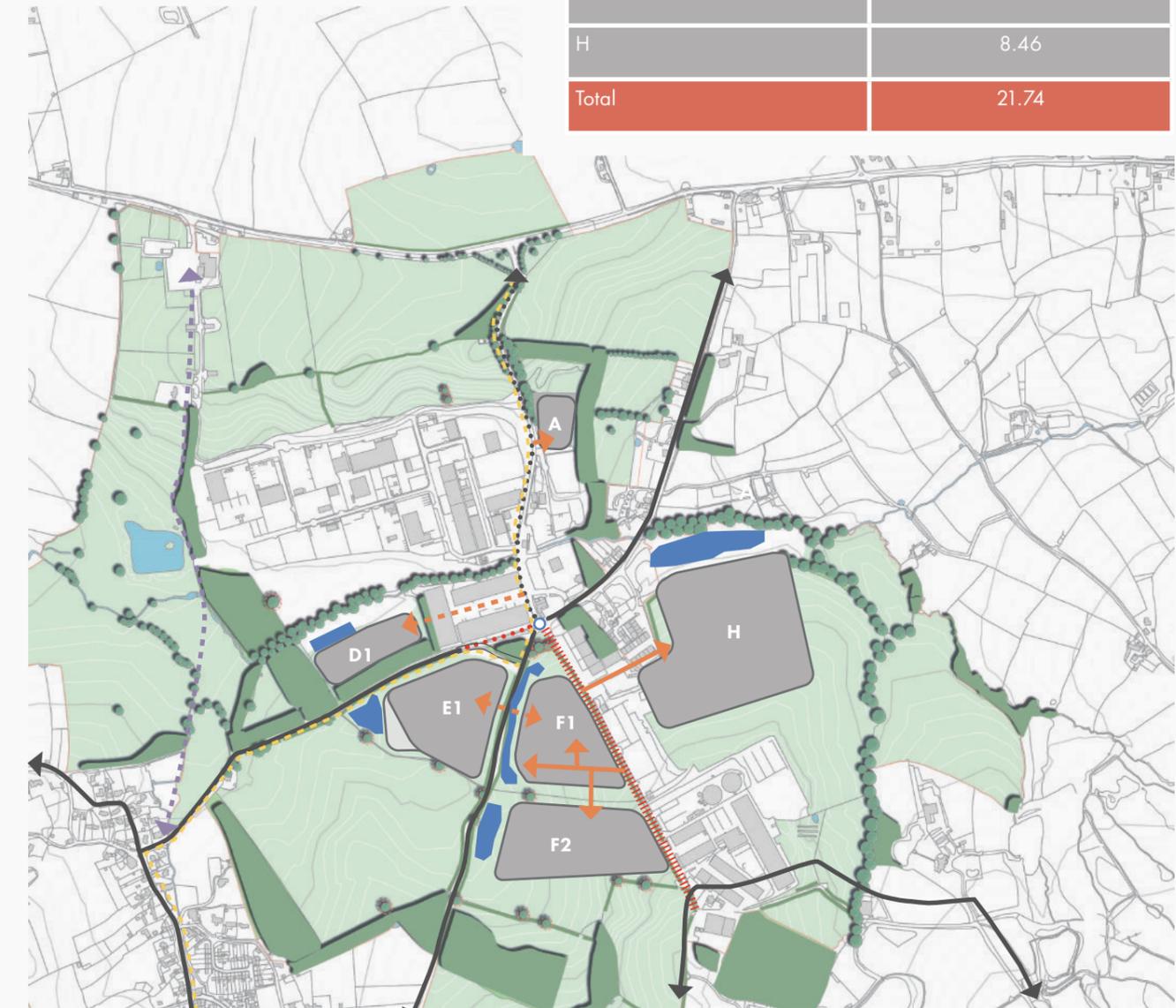
GREENDALE STRATEGIC MASTERPLAN

4.4 Proposed Parcel Plan

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

The adjacent table provides an approximate are for each parcel.

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



PROPOSED PARCEL PLAN

- Parcels to be developed (Suitable for built form)
- Compound area (not suitable for built form)

LANDSCAPE AND ENVIRONMENTAL ENHANCEMENTS

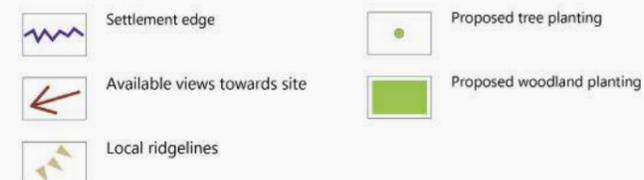
5.1 Visual Mitigation Strategy

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

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



PROPOSED LANDSCAPE AND ENVIRONMENTS ENHANCEMENTS PLAN





PROPOSED LANDSCAPE CHARACTER ENHANCEMENTS PLAN



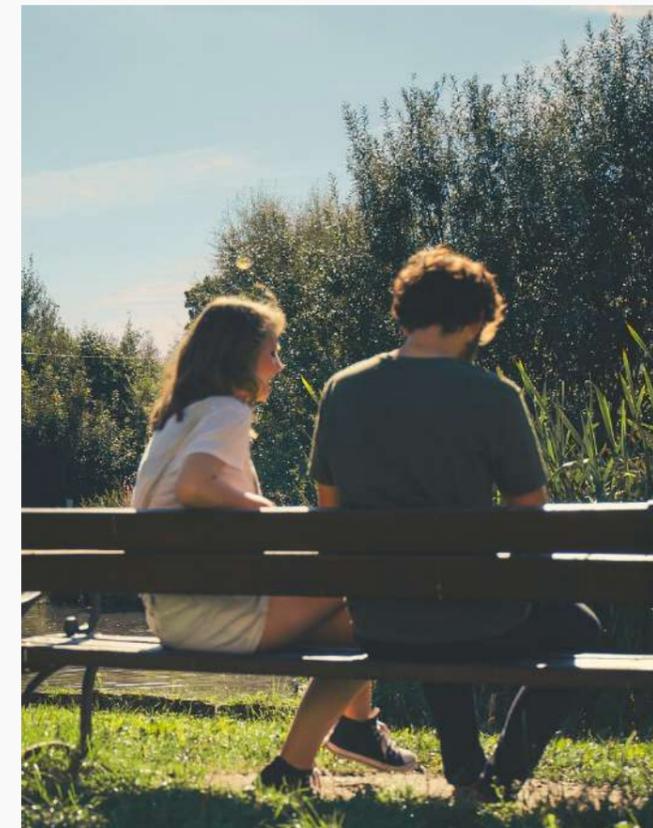
PROPOSED RECREATIONAL STRATEGY PLAN



5.2 Landscape Character Enhancement Strategy

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

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



5.3 Recreational Strategy

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

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

5. LANDSCAPE AND ENVIRONMENTAL ENHANCEMENTS



5.4 Biodiversity Enhancements

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

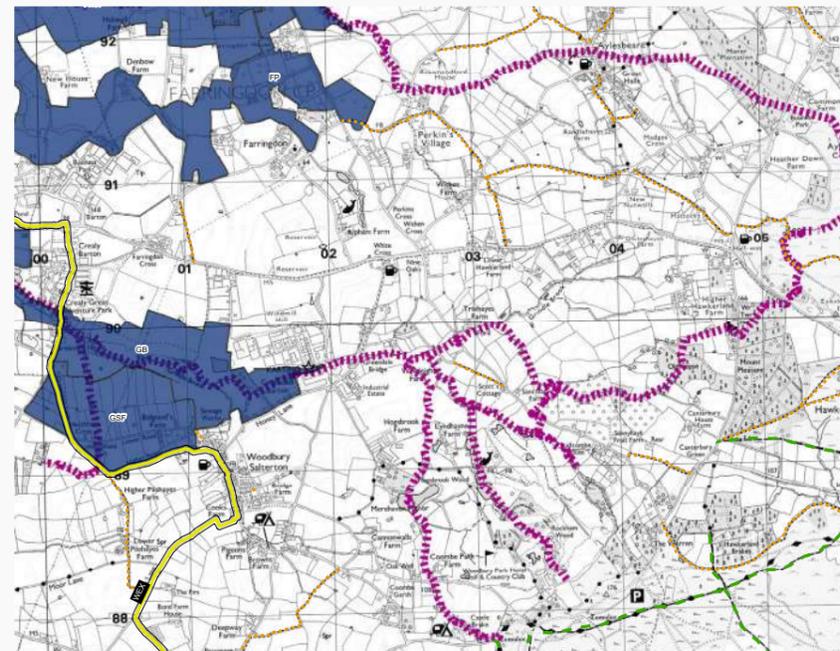
During masterplanning, the Defra biodiversity metric was also used to estimate the habitat required to prevent loss of biodiversity through the removal of low value habitats to facilitate development, such as arable land. This identified that the areas surrounding the development plots, along with the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

Detailed design proposals will focus on:

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



CLYST VALLEY REGIONAL DRAFT MASTERPLAN



EXTRACT FROM CLYST DRAFT REGIONAL MASTERPLAN DETAILED MAP



MASTERPLAN PROPOSALS

NOTES

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



PROPOSED STRATEGIC MASTERPLAN 250m 500m

KEY

Landscape structure and features

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

Recreational features

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

Landscape and visual considerations

- Settlement edge
- Available views towards site
- Local ridgelines

INDIVIDUAL PARCEL OPPORTUNITIES

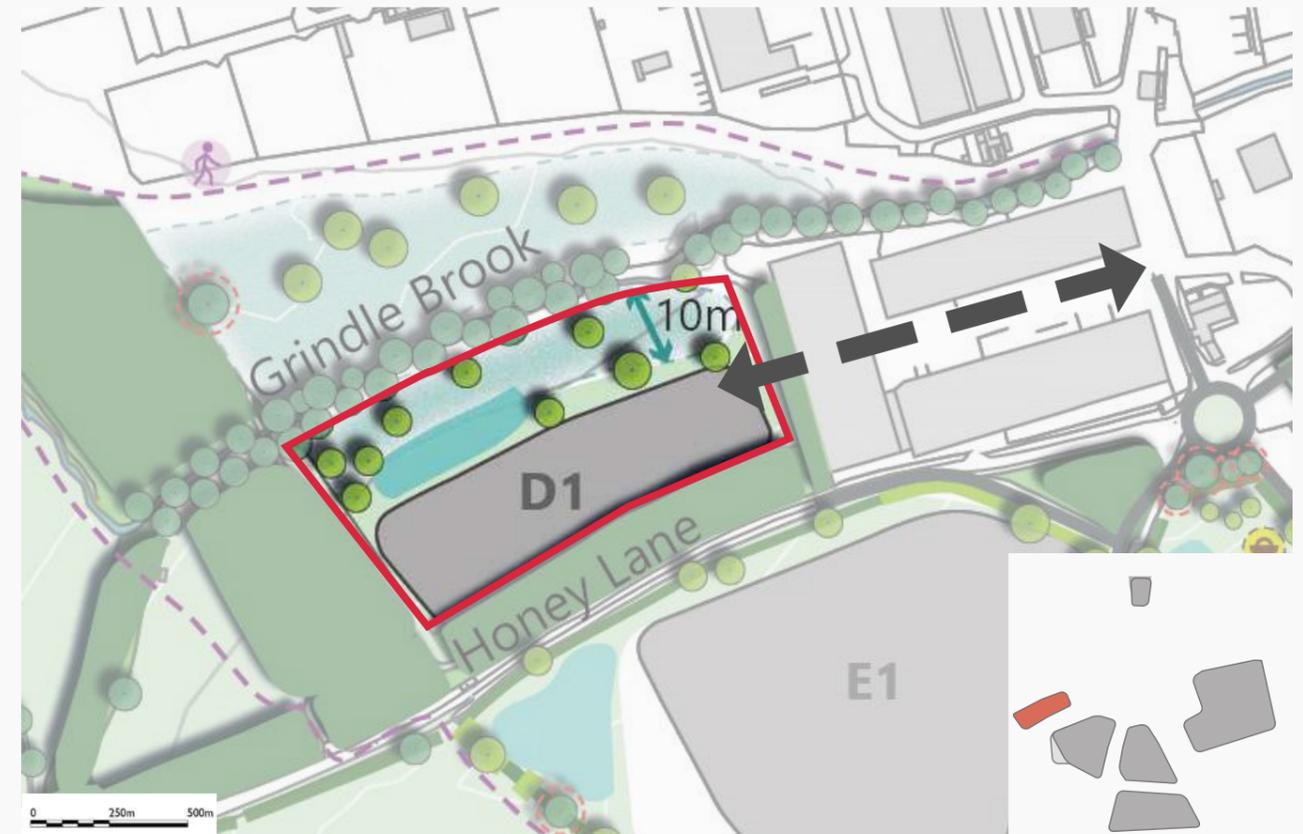
PARCEL A	
Maximum height of development before becoming visible from AONB	Parcel A has been identified as partially visible from the AONB. The design of any new buildings in this location will consider the wider context views from the AONB.
Potential Use Type	B1 use type. Considering the sensitivity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



PARCEL A DETAIL PLAN

KEY PLAN

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



PARCEL D DETAIL PLAN

KEY PLAN

INDIVIDUAL PARCEL OPPORTUNITIES

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



PARCEL E1 DETAIL PLAN

KEY PLAN

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



PARCEL F1 DETAIL PLAN

KEY PLAN

INDIVIDUAL PARCEL OPPORTUNITIES

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



PARCEL F2 DETAIL PLAN

KEY PLAN

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



PARCEL H DETAIL PLAN

KEY PLAN

ENERGY AND SUSTAINABILITY

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

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

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

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

- a. Conserving and enhancing the environment

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

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

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

- b. Prudent natural resource use

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

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

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

- c. Promoting social wellbeing

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

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

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

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

d. Encouraging sustainable economic development

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

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

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

e. Taking a long term view of our actions

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



ECONOMIC BENEFITS

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

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

