

CLYST HAVEN LTD
REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19
CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP

INTRODUCTION

Bell Cornwell acts as planning consultant for Clyst Haven Ltd, very well-established local landlords, investors and developers of commercial property in East Devon and beyond.

Clyst Haven Ltd is the sole owner of land located immediately to the north of the A3052 and west of Hill Barton Business Park in the West End of the district (please refer to the location plans copied below). Please note that the southernmost portion of the land (outlined in red) already benefits from an extant planning permission for a major office development (planning permission reference 17/1329/MFUL). The acceptability of developing this land has already, therefore, been established.



Location Plans

Our client’s land falls within the draft boundary of the proposed new community for East Devon. In this regard, we are actively participating in the new community masterplan stakeholder engagement process.

Against this background, the following representations are made on the East Devon Local Plan Regulation 19 Consultation Draft.

CHAPTER 3. THE SPATIAL STRATEGY

Strategic Policy SP04: Employment Provision and Distribution Strategy

Clyst Haven Ltd supports the provision of land for the full range of employment uses across the district and at the second new community, in particular. This is crucial to balance housing growth, which is to include the provision of at least 8,000 homes at the second new community during the Local Plan period.

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Notwithstanding this, our client objects to Strategic Policy SP04 as drafted currently because the level of employment provision proposed is not based on solid evidence. This part of the Local Plan has not been positively prepared to meet the area's critical need for jobs and employment land and, therefore, is not sound.

Strategic Policy SP04 states that the level of provision proposed gives range and choice when measured against a quantified need informed by the (Greater Exeter) Economic Development Needs Assessment (EDNA). The EDNA was produced by external economic development advisors and, perversely, East Devon District Council's own Economic Development officer had no involvement with this assessment. Crucially, this key evidence document that is informing draft economic policies and allocations for the district does not factor in unmet demand for employment land, which is a fundamental flaw in the process. All current demand should be factored in in order for this part of the Local Plan to be sound.

The Local Economic Review (LER) (2023) incorporates the most recent data available and must be used as the key evidence document in the preparation of the new Local Plan. The LER highlights the unmet demand for employment space in the district and this must be taken into account when considering the number of sites that need to be allocated and the level of employment provision for the district.

The LER highlights core challenges and demonstrates that even if every site identified as being potentially developable is developed within the next 21 years, there will still be a shortfall of 42.7ha of employment space (page 37)! Additional provision must be identified to meet local need (including the unmet demand), ensure there is choice in the market and prevent out-commuting to Exeter.