Exeter Local Plan Examination – EDDC Statement on Employment Land

Introduction

1.1 The following submission pertains to Matter 1 (Issue 1) and Matter 2 (Issue 3), i.e. the duty to cooperate and employment land requirement. This statement seeks to respond directly to a number of the inspector's questions on these matters where these cover issues of disagreement between East Devon District Council (EDDC) and Exeter City Council (ECC) as identified in their statement of common ground[1].

Matter 1 – Legal Compliance, Issue 1 - Duty to Cooperate

Q3. Have any neighbouring authorities approached the Council to help address their unmet needs or vice versa? If so, what process did the Council follow and what was the outcome?

1.2 East Devon District Council (EDDC) has engaged in several meetings with Exeter City Council (ECC) to discuss their respective approaches to employment land provision and how these contribute to meeting the needs of the FEMA. This stemmed from the EDNA's explicit finding that Exeter generates a substantial share of FEMA-wide need and faces supply constraints indicating that some needs would need to be met beyond the city boundaries.

1.3 EDDC has sought to better understand the impacts of ECC's emerging strategy on employment land provision across the FEMA through jointly commissioning further work, but it could not reach agreement with ECC over this further work. Although there has been open and productive engagement on both sides, the Exeter Local Plan relies on employment land allocations outside the city boundaries to meet the need identified for the city in the EDNA. However, there has been no request under the Duty to Cooperate (DtC) to EDDC to assist in meeting the city's employment land needs. EDDC has therefore proceeded on the basis of planning to meet East Devon's own needs only, as set out in our Regulation 19 Local Plan evidence and objection to the Exeter Plan.

1.4 ECC's Topic Paper assembles a higher notional FEMA supply by combining emerging plan allocations across authorities[2]. This does not substitute for

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[1] See Exeter Plan Statement of Common Ground, Exeter City Council and East Devon District Council (September 2025)

[2] See Topic Paper: Economy and Jobs (September 2025)

plan-level clarity about Exeter's own need and the distribution of unmet need via the Duty to Cooperate.

1.5 In its September 2025 Topic Paper, ECC state that "*There has been no request under the Duty to Cooperate as the need for employment land has been exceeded across the FEMA*."[3] It has been suggested that most of this need can be accommodated through 'oversupply' in East Devon and Teignbridge. EDDC object to this notion, rather stating that undersupply remains across the FEMA (see Table 1).

1.6 EDDC's employment allocations were selected to meet its own specific requirements, not to absorb Exeter's unmet need.

Matter 2 – Housing, Employment and Retail Need, Issue 3 – Employment Land Requirement

8. The Economy and Jobs Topic Paper identifies a need for about 255 hectares of employment land across the Greater Exeter Functional Economic Market Area (FEMA) and around 71 hectares for Exeter, based on the mid-point economic growth scenario.

Q1. How has this requirement figure for Exeter been established? Is it robust and based on appropriate available evidence? Is this a minimum requirement and is it adequately set out in the Plan?

1.7 The Planning Practice Guidance sets out how economic need can be determined for policy-making, stating that "authorities will need to prepare a robust evidence base to understand ***existing*** business needs" and "will need to develop an idea of ***future*** needs".[4]

1.8 The Economic Development Needs Assessment (EDNA) comprises of two reports:

I. The JLL report published in November 2022 providing a "market overview" of current supply and demand at the time of the report's development.[5]

II. The Hardisty Jones Associates (HJA) published January 2023 which models for the future scale and location of economic growth across the area.[6]

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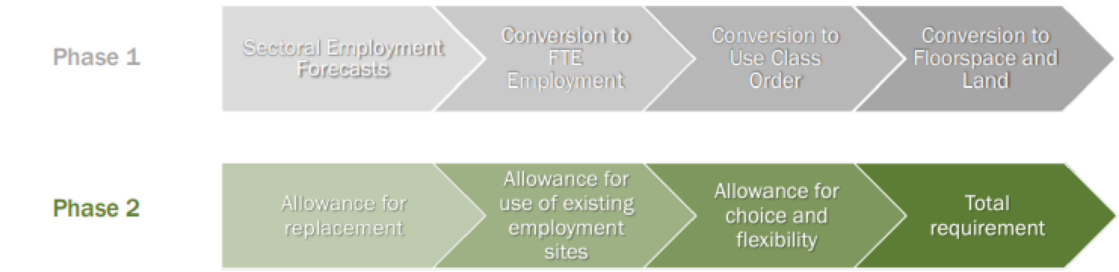
[3] Ibid, page 14.
[4] See Housing and economic needs assessment (February 2025)
[5] See Greater Exeter Economic Development Needs Assessment, JLL (November 2022)
[6] See Greater Exeter Economic Development Needs Assessment Final Report, HJA (January 2023)

1.9 Together, the two reports are in accordance with the expectations set out in the Planning Practice Guidance. However, it should be noted that JLL's 2022 'known demand' figures have not been incorporated into HJA's long-term forecasts.

1.10 Section 5 of the HJA EDNA, as shown illustratively in Figure 5.1, does not include existing unmet need in the methodology for forecasting future need. It is also not considered or 'added on' to any of the scenarios underpinning the forecasting[7].

Figure 5.1: Approach to assessing sites and premises requirements



1.11 It has been suggested that as JLL's known demand figures were as of November 2022 that these are somehow 'priced in' to HJA's forecasts for 2020-2040. However, for this to be a robust assumption, it must assume firstly that there was no unmet demand prior to 2020, despite JLL noting 'market failure' in the Greater Exeter FEMA. Secondly, it must assume that 148ha of demand[8], or 52% of the 284ha for the whole 2020-2040 period, only came about in the first two years of the twenty year period. Clearly, this is not a robust or reasonable assumption.

1.12 To ensure that both existing business needs and future business needs were taken into account, as per the PPG guidance, EDDC considered this to be a material reason for the allocation of additional employment land. When balancing out the FEMA-wide average of known demand equally between the four districts, this comes to around 37ha of additional employment land per district.

[7] See '4.5 Alternative Scenarios' in Greater Exeter Economic Development Needs Assessment Final Report, HJA (January 2023)

[8] As known demand is footloose between the four different districts, an average of 519,819m2 of industrial and office demand is considered, converted to 148ha of land once a curtilage rate of 65% is considered for industrial land and 60% for office land.

TABLE 1					
Demand and Supply (ha)	**Exeter**	**East Devon**	**Mid Devon**	**Teignbridge**	**Total**
Known unmet demand (2022)[9]	37	37	37	37	148
Forecast demand (2020-40)	54	85	51	59	249
Total demand	91	122	88	96	397
Forecast supply (2020-40)	21	125	*50*[10]	100	296
Difference (under-supply)	70	-3	38	-4	101

1.13 It should be noted that Teignbridge District Council have already taken a similar approach in their plan, which has recently been considered at examination, by allocating land in addition to HJA's forecast future need requirement. TDC state that this "*provides choice and competition in the market (particularly given how the evidence references issues of unsatisfied demand)*".[11] EDDC is therefore taking a consistent and reasonable approach by factoring in both unmet known demand and future forecast need, as expected in the PPG.

1.14 Lastly, it should also be noted that unmet demand is expected to be higher than JLL's 'known demand' figure. JLL state that "*we would anticipate that the actual figure for industrial demand is higher with a significant amount of latent demand, which would come forward if opportunities were brought to the market*".[12] Latent (unexpressed) demand is difficult to evidence but nevertheless needs to be factored in to some extent.

Demand = latent unmet demand + known unmet demand + future forecast demand

Q2. The Topic Paper also suggests that the Plan will supply about 21 hectares of employment land. Is the Plan justified in seeking to allocate less employment land than required? If this need for employment land cannot be met in Exeter, how and where will it be met?

[9] Ibid.
[10] For Mid Devon, which is at the Reg.18 stage of their Local Plan, no specific forecast supply figure has been indicated. The JLL EDNA report identified 50.3ha of land for Mid Devon has been applied as a placeholder.
[11] See Teignbridge District Council's response to Inspectors' Matters, Issues and Questions (3.1 - 3.11) in relation to: Matter 3: Overall Scale of Housing and Employment Growth, section 3.6.24, page 28.
[12] See Greater Exeter Economic Development Needs Assessment, JLL (November 2022), section 2.3.3

1.15 The Topic Paper assumes that much of the unmet need in Exeter will be met in East Devon, however this is not the intention of the emerging East Devon Local Plan. The East Devon Local Plan allocates a quantum of employment land that is designed to achieve self-contained communities, address historically low job densities and other factors such as choice in the market as well as seeking to address the impacts of Biodiversity Net Gain (BNG) and SuDs requirements that reduce job densities on employment sites.

Achieving settlement self-containment in East Devon

1.16 Strategic Policy SP04 (employment provision and distribution strategy) of the Reg.19 draft of the East Devon Local Plan specifies a quantum of employment provision to meet expected need for the district of East Devon only. This provision is made up of five constituent parts, which have since been revised, as shown below:

A. Sites allocated in this plan (not at new communities) – 88.66ha
B. Sites at Cranbrook – 19.2ha
C. Sites at Marlcombe (up to 2042) – around 17.5ha
D. Sites built 2020-2024 – 6.8ha
E. Sites with planning permission or under construction at 2024 – 44ha

Total – 176.16ha

1.17 For the site allocations (A sites), this new figure includes most but not all of the sites identified in the JLL report. Some of the JLL sites are being proposed for deallocation, primarily due to major site constraints, like flooding for example. New sites proposed for allocation have been included here (see Appendix 1 for full list), following various 'call for sites', as part of the Local Plan process.

1.18 Sites to be allocated outside of the new communities (A sites) can be broken down further as follows:

I. Sites allocated in this plan to promote settlement self-containment/form the employment element of a mixed-use scheme – 42.3ha
II. Small scale allocations to enable the expansion of existing, or start up, rural businesses – 6.72ha
III. Strategic allocations north and east of the airport for high-tech airport related uses, clean growth businesses and logistics – 39.64ha

Total – 88.66ha

1.19 Allocating employment land within East Devon's towns is vital to supporting their self-containment and promoting a more sustainable pattern of development, consistent with the NPPF's overarching requirement for plans to achieve sustainable development (para. 7).

1.20 The provision of well-located employment allocations directly within towns such as Exmouth, Honiton, Axminster, Sidmouth and Ottery St Mary can reduce out-commuting and reduce travel distances as well as helping to shift journeys to more sustainable modes. This aligns with NPPF policies on promoting sustainable transport (paras. 109–118), which support reducing the need to travel and encouraging patterns of development that promote non-vehicular transport modes. It also supports a strong, competitive local economy (paras. 85–89), and ensures that economic growth is not hindered by a lack of suitable land. This element of the emerging Local Plan's spatial strategy ensures that employment land allocations can deliver more balanced communities, strengthen the district's economic resilience, and support sustainable placemaking across the East Devon towns.

1.21 For Cranbrook and Marlcombe, the second new community, (B and C sites), sites are identified through the Cranbrook Plan, for the former, and specific sites have not yet been identified at Marlcombe as these will be developed through various masterplanning exercises. The purpose of these allocations is to help supply future forecast demand for these specific communities, to support their self-containment.

1.22 Employment sites built between 2020 and 2024, along with those granted planning permission or under construction by 2024 (referred to as D and E sites), are accounted for in the council's Employment Land Review. Although it is not possible to know if these sites could accommodate the enquirers in JLLs known demand data, it is likely that at least some of this development could help to address this and an element of latent demand as of 2022.

TABLE 2					
East Devon (ha)		**Demand**			
		Latent	Known	Future	Total
Supply	(A) Allocations	40.36	0	48.3	88.66
	(B) Cranbrook	0	0	19.2	19.2
	(C) Marlcombe	0	0	17.5	17.5
	(D) Built	0	6.8	0	6.8
	(E) Planned	13.8	30.2	0	44
	Total	54.16	37	85	176.16

1.23 The table above shows how the three different types of demand can be accommodated through the five different types of supply. It shows how allocations (outside of the new communities) can help to address future forecast and latent demand. Given that JLL state that there is a "significant amount of latent demand"[13] in addition to current known demand, the 54.16ha of employment land to address latent demand should be sufficient.

[13] See Greater Exeter Economic Development Needs Assessment, JLL (November 2022), section 2.3.3

1.24 As the table below shows, the quantum of land to be allocated, along with land already developed or permitted for development since 2020, should be sufficient to meet identified need in East Devon.

TABLE 3	
East Devon Demand and Supply	**ha**
Latent demand (2022)	54
Current demand (2022)	37
Forecast demand (2020-40)	85
Total demand	176
Forecast supply (2020-40)	176
Difference (under-supply)	0

Responding to East Devon's historically low job-density ratio

1.25 It should be noted that the 176ha of employment sites identified is significantly above the 85ha required to meet forecast employment requirements stemming from housing growth. However, East Devon had a job density ratio of 0.74 (74 jobs per 100 residents aged 16-64) in 2023, below the Exeter ratio of 1.15.[14] As such, the development of 176ha of employment land will not only help to address business need, but also help to address East Devon's low job density ratio and therefore support self-containment.

Other Considerations

1.26 Since the EDNA was produced, policy changes requiring BNG, sustainable drainage systems, and other environmental improvements have reduced the achievable job densities on employment sites. As such, it is envisaged that more land will be needed to meet the identified employment land needs. There is also a need to allow choice within the market and allocate beyond the identified need to allow for sites that may not be delivered due to unforeseen costs or other constraints.

1.27 The two-page 'Employment Change in Exeter' document states that "the majority of new jobs in Exeter will not require employment sites and premises".[15] The Topic Paper continues by stating that "*over the period from 2020 to 2040, the City of Exeter is expected to see growth of between 11,300 and 11,900 FTE jobs that do not require employment premises*"[16]. Such assumptions are not sufficiently evidenced and are therefore neither robust nor useful in helping to determine a reasonable projection of employment land to meet Exeter's current unmet and future need.

[14] See Nomis, local authority profile for Exeter and East Devon, 2023
[15] See Employment Change in Exeter (June 2025)
[16] See Topic Paper: Economy and Jobs (September 2025), section 8.13

Appendix 1: Updated Site Sizes (excluding deallocated sites)

When composing the EDNA report, JLL noted that "*further, detailed, assessment work will be undertaken by the local authority and that the status, and therefore quantum of supply, may be revised in light of this*".[17] Since the report's publication, site sizes have been checked against planning permissions and officer assessments to provide accurate and up to date figures.

Site	**Size (ha) (JLL, 2022)**	**Size (ha) (EDDC, 2023)**
Alexandria Industrial Estate, Sidmouth	0.2	0.2
Exeter Gateway Office Park	1.5	1.6
Exeter Logistics Park	10.1	13.7
Exeter Science Park	14.9	4.5
Finnimore Industrial Estate, Ottery St Mary	2.2	2.2
Goodmores Farm, Exmouth	2.3	2.0
Honiton Gateway	1.4	1.4
Land north of Sidford	5	5.8
Land off Devonshire Road, Heathpark (011B)	0.9	0.9
Land off Devonshire Road, Heathpark (011D)	0.3	0.3
Land to the north of Harepath Road, Seaton	4.6	2.2
Land west of Hayne Lane, Honiton	14.5	15.1
Liverton Business Park Phase 3, Exmouth	2.8	2.8
Millwey Rise, Axminster	6.5	2.7
PowerPark Exeter, Long Lane	6	7.5
Skypark Exeter	25	12.8
Treasbeare Farm, Clyst Honiton	8.1	9.7
Total	106.2	85.4

[17] See Greater Exeter Economic Development Needs Assessment, JLL (November 2022), section 4.2.5