

Mid Devon Local Plan Review Examination

Hearing Statement: Matter Policy J27, Issue 1

This statement should be read in conjunction with the representations¹ made by GL Hearn on behalf of Friends Life Ltd (c/o Aviva Investors Global Services Ltd) (herein FLL) and seeks to complement and expand on those representations as necessary to assist the Inspector in determining the extent to which the Local Plan meets the appropriate tests of legal compliance and soundness.

1. IS THE EVIDENCE BASE SUFFICIENTLY ROBUST TO DEMONSTRATE A NEED FOR THE SCALE OF THE TOURIST ATTRACTION PROPOSED?

- 1.1. The evidence base relied upon to support the J.27 policy approach is described within the Statement of Common Ground (SoCG) between Mid Devon District Council (MDDC), FLL and The Eden Project (Eden) (August 2017).
- 1.2. The Mid Devon Tourism Study (MDTS) November 2014 (ECO05) recognises within the Conclusions Section that the key tourism assets within the District comprise the three main market towns; the natural environment and green infrastructure for which the County is known more widely; and the important strategic routes by road and rail that pass through the district (M5 and A361 are noted particularly), which carry high volumes of tourist traffic through the district on route to destinations further afield within the South West peninsula. There is recognition that the District functions as a 'gateway' to regional attractions such as Exmoor and the North Devon coast; Dartmoor and South Devon and to the whole of Cornwall for visitors from the majority of the UK and for most international visitors. Junction 27 sits at the gateway to Devon and Cornwall, adjacent to the principal road and rail routes running from the North East Triangle down through the Heart of the South West into the Western Peninsula. It is a uniquely accessible transport node that provides a regional opportunity to expand on growth in the tourism sector by getting tourists to stop in Mid Devon and to increase length of time and spend in the District.
- 1.3. The MDTS recognises that the existence of these routes and the high number of visitors that pass along them on their way to visit other destinations provides a key opportunity to create tourism infrastructure that will capture/intercept visitors to the region and persuade them to stop and experience attractions that the District can offer more widely. As summarised within the SoCG (paragraph 4.23) the report recommends a multi-faceted approach to attracting visitors. Across a series of six identified 'strands' a number of themes are developed that are carried forward directly and indirectly into the J.27 Policy.
- 1.4. The MDTS recognises that Mid Devon occupies a strategic location between Exeter and Taunton and that accessibility to the area from the rest of the UK is strong as a consequence of the motorway network and mainline rail connections. Tourism forms an important component of the local economy, but there is recognition within the report that total tourism spend is relatively low (compared to other areas in Devon), reflecting the lack of major visitor attractions². In 2015 tourism accounted for 5% of the proportion of all employment, representing 1,505 FTE and 2,084 of actual employment. Total visitor related spend amounted to £101,133,000.

15th August 2017

¹ Representations To Mid Devon District Council's Consultation On Its Proposed Submission Local Plan (February 2015) on Behalf Of The Eden Westwood Partnership (April 2015); and Representations To The Mid Devon Local Plan Review Proposed Submission (Incorporating Proposed Modifications) January 2017 on Behalf Of Friends Life Limited (C/O Aviva Investors Global Services Limited) (February 2017) ² ECO05 para.3.28

G:\KLM\170815 Hearing Statement Issue 1 FINAL.DOCX



- 1.5. Notwithstanding the importance of tourism to the local economy, Mid Devon's performance in the retail economy is relatively low compared to the region and this reflects the lack of major visitor attractions. Mid Devon's day visit spend is calculated as accounting for only 6%³ of the County's day visit expenditure despite it being predominantly a day visit destination⁴
- 1.6. The evidence base recognises that this is a missed opportunity; drawing on references outlined within the SoCG the MDLPR seeks to exploit the development/inward investment opportunity presented by the strategic location alongside junction 27 of the M5. GL Hearn's representations to the Main Modifications consultation (February 2017) outline the changes to the MDLPR that are considered necessary to ensure that the scale of the opportunity and the ambition enshrined within the J27 Policy are properly reflected within the Vision and Spatial Strategy of the Development Plan.
- 1.7. Planning Practice Guidance (PPG) recognises that tourism is an extremely diverse sector and covers the full range of activities undertaken by visitors to an area⁵. The PPG advises that local planning authorities should articulate a vision for tourism within their Local Plan, including identifying optimal locations for tourism development. The Council has recognized this objective and has incorporated Policy J27 into the Local Plan as a targeted and positive response to the challenge of attracting more visitors to the district and increasing the economic spin-offs from tourism, to address Mid-Devon's relative under-performance in this regard.
- 1.8. Importantly, when planning to meet the needs of the tourism sector the PPG advises that local planning authorities (LPAs) should:
 - Consider the specific needs of the tourist industry, including particular locational and operational requirements;
 - Engage with representatives of the tourism industry;
 - Examine the broader social, economic, and environmental impacts of tourism;
 - Analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment; and
 - Have regard to non-planning guidance produced by other government departments.
- 1.9. The PPG also advises that it is appropriate for LPAs to take into account guidance produced by other Government departments and best practice produced by the tourism sector, including having regard to publications and advice contained on the Visit England website. This is perhaps not surprising given that there is a limited amount of specific planning guidance provided for a sector that is increasingly important to the UK economy and which, in a location such as Mid Devon, forms a critical part of the economy and the future prosperity of the area⁶.
- 1.10. The Government's Tourism Action Plan⁷ opens with a foreword from the Prime Minister which acknowledges that "*Tourism is vitally important to the UK*". In the opening statement there is reference to the fact that tourism provides over £22bn in revenue to the UK economy, but that a high proportion of that revenue is concentrated within London; the Government's objective is to spread the benefits that tourism brings beyond the capital city and out into the regions. To this end there is a commitment from the Prime Minister that "*We must do everything we can to make sure that visitors are encouraged to explore beyond the capital*".

³ The Economic Impact of Mid Devon's Visitor Economy and Evidence Base 2015

⁴ Mid Devon Visitor Survey Report November 2016

⁵ Planning Practice Guidance 007 Reference ID: 2b-007-20140306

⁶ The Economic Impact of Mid Devon's Visitor Economy and Evidence Base 2015

⁷ Tourism Action Plan: Welcome to Great Britain (DCMS August 2016)

G:\KLM\170815 Hearing Statement Issue 1 FINAL.DOCX



- 1.11. In describing the Tourism Landscape the Action Plan advises that there is an undertaking to include tourism as part of the Government's overarching industrial strategy and to ensure that all Government Departments work to deliver a coordinated approach to increasing the attractiveness of the UK as a visitor destination. The document advises that there is a framework of Government support for encouraging the growth of tourism with the objective of making it easier for local areas to develop their own strategies to expand their tourism offer and to provide more certainty for businesses when making investment decisions. The establishment of a £40mn *Discover England Fund* to help incentivise the expansion of tourism development more widely provides a clear signal that Government is serious about maximising the benefits that tourism can bring to the UK economy as a whole, and about ensuring that there is a supportive framework in place to allow for the economic benefits that flow in particular from overseas visitors to cascade outwards from London and the South East to all regions.
- 1.12. The Tourism Action Plan undertakes to ensure there is joined-up working and common-sense regulation across the industry to help support local initiatives and growth as a key component of the Government's post-Brexit industrial strategy. A key part of this is encouraging overseas visitors to come to the UK, a trend that is on the rise, with 36.1mn visits to the UK by international tourists in 2015 (5.1% higher than in 2014). Within this group the greatest proportionate growth in expenditure amongst overseas visitors was experienced in the West Midlands, the North East and the South West, all of which grew at a faster rate than London⁸.
- 1.13. The Government's "*Backing the Tourism Sector: A Five Point Plan*" also recognises the importance of tourism to the economy as a whole, with almost 1 in 10 jobs in the UK being supported by the sector. A key objective within the Plan is to attract and retain talent and to support businesses which are driving growth in the tourism sector. The Government also understands that because tourism is a dynamic and developing area, with new business models emerging all the time, the regulatory framework that impacts on how tourism is promoted and delivered should be kept under review. It is telling in this regard that the Plan states that:

"We will keep our regulatory framework under review to ensure that common sense prevails and we miss no opportunities to protect and grow the tourism sector"⁹

1.14. Visit England has recently published a report on 'Trends for Tourism Product Development'¹⁰ (July 2017). The report reflects on the changing traveller landscape based on key structural societal shifts and the emerging trends that are evolving and affecting the tourism experiences on offer. Within the report Visit England outlines the key implications and action points for English tourism products against the 5-10 year horizon. In respect of 'Inspiration and Pre-planning' Visit England recognises that tourism products will have to work hard to stay on the traveller's radar; and travellers will opt for trips that allow them to collect as many unique experiences as possible on their journey, without having to invest considerable time and money in getting about:

"While travellers are generally thrifty when it comes to booking flights and other sources of transport, there is a clear willingness among people to spend more on unique experiences and activities once arrived at their destinations. Seeking value means choosing destinations which pack in as many great experiences as possible in a single trip..."

"Personalisation will be increasingly key too, with travellers seeking to customise their journey and pick and mix those experiences most relevant to them."

⁸ Tourism Action Plan: Facts and Figures pp.4-5.

⁹ Backing the Tourism Sector: A Five Point Plan (DCMS) p.6

¹⁰ Visit England: The Future Travel Journey – Trends for Tourism Product Development (July 2017) <u>https://www.visitbritain.org/future-trends</u>

G:\KLM\170815 Hearing Statement Issue 1 FINAL.DOCX

^{15&}lt;sup>th</sup> August 2017



- 1.15. The Visit England/Visit Britain website referenced within the PPG also provides data on the value generating activities associated with tourist movements, seeking to quantify expenditure on trips and the purpose of those trips. The principal revenue generating activity for domestic holiday and day visitors (Annual average 2012-2014) by a clear margin is visiting specific 'visitor attractions' (theme parks, famous buildings, museums etc.), with the total average annual spend on such trips being £11.1mn. The next highest revenue generating tourism activity over the period being walking/hiking with a total annual average of £5.2mn¹¹.
- 1.16. The notion of 'need' when planning for tourism related development does not fit easily into a conventional assessment of planning for town centre uses, as set out within PPG and the NPPF. While tourism uses are characterised within the NPPF as Main Town Centre uses it is notable that tourism involves far more than the narrow definition contained with the NPPF; indeed the Government recognises that tourism is a dynamic and rapidly evolving sector (see above) and therefore to ensure that opportunities to promote growth and innovation are not lost the regulatory framework (in all senses) should be kept under review to allow common-sense to prevail when promoting sectoral growth.
- 1.17. In this regard the most pertinent piece of guidance is set out within the PPG: Where appropriate LPAs should articulate a vision for tourism in the Local Plan, including identifying optimal locations for tourism-related development. Critically in this respect the LPA should consider the needs of the industry (particularly from a locational perspective) and should engage with appropriate representatives to help shape the vision and any policies that flow from the vision in support of this important part of the UK's emerging industrial strategy.
- 1.18. The Council has engaged in such an exercise in developing the policy at Junction 27 of the M5. The long-established dialogue between FLL, Eden and MDDC has been driven by a collaborative relationship inspired initially by the desire of the District Council to create an exceptional visitor-attraction that would put Mid Devon on the tourist map and help achieve a step-change in tourism-related revenue generation within the district. The objectives also included creating an attraction that would have broad appeal and would not be limited to seasonal trade.
- 1.19. The Policy has been developed in partnership, in accordance with the guidance within the PPG, to ensure that the Council's Vision and ambition for developing the tourism economy in Mid Devon is understood by the scheme promoters and that in turn the Council is able to draw on the knowledge of the Eden Project and FLL in operating large-scale visitor/tourism/leisure attractions, in developing an appropriate policy that can deliver against its aims.
- 1.20. The scale of the attraction is a product of the ambition to make a step-change in the tourism-offer in Mid Devon. The strategic location at the regional gateway is such that it presents a unique opportunity to create a regionally significant destination, the scale of which will be important in increasing its appeal. The multi-faceted nature of the offer also seeks to trade on a range of factors that have redolence both for the region and for the type of attraction that is being sought: namely a cohesive scheme that will appeal across ages, abilities and interests; temporally and geographically. The objective is to create a collection of different uses and activities that combine to offer individual or linked attractions depending on the nature and length of the visit being considered. In designing the scheme there has been careful consideration of the extent to which the components will appeal either individually or in combination, and across the whole of the year and to both domestic and international visitors alike. Specifically in this respect the scheme promoters are able to draw on extensive experience in promoting, developing and operating major leisure attractions, using that

G:\KLM\170815 Hearing Statement Issue 1 FINAL.DOCX

Page 4 of 6

¹¹ Visit England: The Value of Activities for Tourism. <u>https://www.visitbritain.org/sites/default/files/vb-corporate/Documents-Library/documents/England-documents/summary_of_activities_template_v2_0.pdf</u>



experience to forecast how the sector is likely to develop and change over the Plan period and to bring that knowledge together to create a unique destination¹².

- 1.21. The nature and scale of the attraction is driven by: the objectives and opportunities identified in the evidence base¹³; the Council's desire to create a tourism attraction that will meet those objectives and make the most of the opportunity that has been identified by having an appeal and reach across the region; the expertise and experience of the scheme promoters in terms of what is required to make a successful attraction that would meet the stated objectives (Appendix 1A); and the particular spatial requirements of the attractions that are proposed to be included within the allocation. In this regard, Colliers International Destination Consulting, who are the market leaders on feasibility advice for the newly evolving sector of surf parks¹⁴, advise that the surf lagoon requires at least 22,500 m² of lagoon area¹⁵, plus additional space for the associated surf school, café, shop facilities. An area of approximately 5 hectares is required to facilitate this element of the allocation.
- As is set out within the concept brochure¹⁶ prepared on behalf of Eden Westwood, Sir Tim Smit the 1.22. co-founder of the Eden Project, has stated in support of the project:

"Eden Westwood has the potential to revolutionise Mid Devon's profile in the region and nationally, making it a leader in tourism, education, farming and sustainability, delivering huge opportunities for local people and ultimately transforming the fortunes of the area"

1.23. The 'need' for the scale of the scheme proposed at Junction 27 is therefore a product of the Council's desire to deliver an exceptional and transformational tourism destination and recognition of the needs of the industry to create a multi-faceted attraction that caters effectively for a range of visitors drawn from both domestic and international markets. The components have synergy and combine to create a unique proposition that is the product of a long-standing and ambitious partnership between promoter and regulator that reflects the Government's ambition for the UK tourism sector, which is a key part of the UK's 21st century industrial strategy.

Page 5 of 6

¹² See also: Sir Tim Smit Forward April 2015; A Major Tourism and Leisure Opportunity Narrative April 2015; and Eden Westwood: Food Farming and Life in Devon 2016

³ Mid Devon Tourism Study November 2014

¹⁴ Colliers International Destination Consulting has been instructed to carry out market and financial feasibility work on fourteen potential surf park projects across the UK, Europe and further afield, including Surf Snowdonia (the world's first Wavegarden lagoon, opened 2015), Bristol, Edinburgh, London, Barcelona, Madrid, South Carolina, Hamburg, Munich, Tokyo (for 2020 Olympics) and Singapore. ¹⁵ There are various options available on the market (Wavegarden, Kelly Slate Wave Co, Surf Loch, American Wave Machine) which different demands on area requirements, capacities, operation etc. Colliers advice would be to assume the surf lagoon is a Wavegarden® Cove. This would be most appropriate for the market location - it allows for a large volume on lower skill/learner surfers,

and provides the best balance of size, capacity, cost and deliverability. ¹⁶ Eden Westwood Food, Farming and Life in Devon

G:\KLM\170815 Hearing Statement Issue 1 FINAL.DOCX



APPENDIX 1A: THE EDEN PROJECT: THE NEED FOR EDEN WESTWOOD AND THE ARK

J27 Allocation Proposals

Background

Britain is an island nation. Food security is therefore of immense importance to it. The basis of much of its former Imperial power was built on the exercise of control over plants and their development into commercial and sustaining crops; quinine, sugar, rubber, cocoa, cotton, coffee, bananas, potatoes and so on. The hub of the Imperial operation was the Royal Botanic Gardens at Kew and its outposts around the world. As this influence waned the agronomic/horticultural expertise for mass production and genetic improvement fell to the emerging scientific research centres such as Wellsbourne, Rothamsted and West Malling. As Britain entered the 1970's it could be argued that it was the foremost nation in the world for agronomic research and development. A network of agricultural, horticultural and silvicultural colleges had emerged across the country, supported by specialist faculties within the universities.

Today, the horticultural colleges represent a rump of what they once were. Many have closed and those that remain are subject to low morale in a profession that has been allowed to wither, patronised with the stigma of presenting a career of low financial expectations and low social standing. The assumption casually made is that agronomy is a vocation for those unsuited to intellectual or technical pursuits.

This is an area of science that has become overlooked. Sadly, there are now no Botany Departments at any university in Britain. It is mentioned at a few as an adjunct or part of a combined Natural Sciences degree. The major research stations have in most cases either been decommissioned or at the very least reduced.

Yet Agronomy is an applied science the equal to engineering, pharmacy or medicine, both in terms of knowledge and skill, but also in its importance to the human condition.

In Scandinavia and much of the rest of Northern Europe Horticulture and agriculture are seen as professions, their practitioners are professionals, their financial expectations are high, their social status is on a par with other professions such as accountants, lawyers, engineers etc..

In Britain attracting high aspiring young people into this field has become increasingly difficult (with some notable exceptions discussed later in this document). The vision held out for it is of a service industry to amenity horticulture in parks and gardens, or farm labouring, or, in rare cases, niche growing for crops and the making of products for the affluent. There is little or no expectation of an entrepreneurial skillset, management expertise or marketing/branding understanding. There are tens of millions of pounds worth of studies and research papers on novel crops and techniques on shelves across the country, all destined to be unread, unutilised because those carrying them out had little understanding of how to address the making of markets, the influencing of politics, or high finance.

The Eden Westwood proposals (as informed by the J27 allocation in the draft Mid Devon Local Plan) aims to tackle some of the difficulties (outlined above) within this important development, such that people are inspired to desire a meaningful, scientific career in agronomy.

According to the Stockholm Resilience Centre, advisors to the UN and most major international bodies concerned with their emerging scientific concept of Planetary Boundaries (Rockström et al.) agriculture is responsible for c. 43% of the total negative impacts on the planet, through its use of fossil fuels, over use of nitrates, phosphorus etc. and the impacts of deforestation, pesticide use and so on, on soil erosion, soil fertility and water. Here is not the place to list the various impacts in any detail, but suffice it to say that agriculture is the most important global influence on our sustainable future.

The average age of farmers globally is now over 60 and in the UK it is 59. A rash of highly publicised small businesses growing salads in industrial environments and capturing media attention should not be allowed to disguise the fact that with a global population set to rise significantly further and global soil fertility falling...this represents a huge threat to humanity.

Britain still retains the folk memory of its proud agronomic traditions which gives us something muscular to build on. This memory will have gone within 15 years as the last of the 70's generation retire and their influence has gone. The Eden Project, with three projects in China, finds it remarkable that senior Chinese visitors still believe Britain is the leading horticultural nation and sets great store by its partnership in areas vital to China's interests; food safety and food security.

These are global trends that influence us all. Food security is a global, national and local issue.

Eden is a charity that engages people en masse to connect with each other and the living world. The messages through storytelling and public engagement are so critical that they cannot be confined to a destination, albeit a successful one, in Cornwall. This engagement needs to be conveyed on a local, national and international stage, which is why we have a national and international strategy.

If we are to discuss agriculture, horticulture and the coming together in agronomy, then you need to have a place where that heritage is credible. There is arguably no better place to do this then in the agronomic heartland of Devon.

The Need for Eden Westwood and The Ark

The Eden Project in Cornwall opened in 2001. The site at Bodelva has a total area of 22 hectares with around 10 hectares of outdoor gardens. As well as the iconic Rainforest and Mediterranean biomes, there are numerous supporting buildings and infrastructure that

eden project

support the educational and tourism offers. Part of the Eden Project's offer as it expands across the UK and internationally is that it will contain iconic architecture and that the sites will be of sufficient scale to allow both the creation of the icon and for many hundreds of thousands of visitors to enjoy the supporting facilities. The proposals at Junction 27 are no different.

In simple terms, part of the reason for the scale is to ensure that we do not repeat the errors of our Cornish opening. The original business plan saw market research indicate that a base case annual visitor number would be 500,000 with an upper case of 725,000 – this infrastructure was created to cater for this range. In the first year of opening, 1.8M visitors arrived at the site and it required the next four years to retrofit the infrastructure, such that it could cope with around 1.2 to 1.5M visitors which had become the norm at that stage. Today, despite its geographical disadvantages, Eden in Cornwall still enjoys more than 1 million annual visits.

Eden's offer is a particular brand of what has been termed "edu-tainment". Eden is an educational charity, social enterprise and exists to connect people to the living world. As part of this, visitors are the recipient of some of the charitable message. We term this "education by stealth" – i.e. you as the visitor do not realise that you are receiving learning, as you are also having a great day out. This leads us to the second issue is that we will wish to tell the particular story of agriculture (and Devon's role within it). In order to do this, it is important to understand that this will require both space and to understand the context which follows.

If one were to ask a large number of Britons which region and county represented their idyll for agriculture, it would be the West Country and most particularly, the Country of Devon with its soft rolling hills, happy livestock and wholesome produce. Were you to explore where you would locate an embassy for agriculture... a shop window both nationally and regionally for all that is best in agronomy, both present and, future... you would locate it at a point of maximum reach and audience awareness to residents and visitors, easily accessible by road and rail and, in the heart of where the profession is practiced near a ready supply of young people seeking to make choices about their futures (Exeter University, Petrocs College and Bicton College) at a location that in partnership with the world's leading creators of projects marrying science to entertainment and marketing will ensure that a captive audience can be persuaded to look afresh at what agronomy has to offer.

In 2014 Eden began a partnership with Cornwall College developing apprenticeships and Foundation degrees in agronomy. Deliberately we made it a high benchmark to get on the courses and offered business and management training alongside science and applied skills. In 2017, 63 students will enter the second year of their degree and the outcomes are hugely exciting with real flair being demonstrated in Landscape Design, propagation and product development, such that Eden has already committed to employing a number of its students going forward and is being approached by others to make recommendations of future staff.

Within this academic and applied faculty we are addressing the need to train up a new breed of teacher, literate across disciplines and unconstrained by the expectations of the past. This has begun. Eden itself demonstrates the power of advertising as we show our visitors what students are doing which in itself is attracting significant interest and applicants.

eden project

We believe the criteria above suggest that the ideal location for this venture would be at Junction 27 – the gateway to Mid Devon, alongside a motorway and train station.

If one believes that the future of agronomy and the ability to bring on a new generation of smart students into it, is important, it follows that one should begin by first soliciting the views of potential partners.

Eden has formed a science committee comprising representatives from Exeter University, Cornwall College (including Bicton of course), Petrocs. Future partners will include UCL, RBG Edinburgh and Plymouth University among others. All have agreed to assist in the development of exhibitions, courses and the exploration of creating academic facilities on site and developing strands of research into product development, incubation and health and wellbeing initiatives through nutrition etc. We will also be welcoming the Devon County Agricultural Association to ensure that within Devon the best opportunities can be made available to existing farmers and growers as well as providing inspiration to new entrants.

In order to do this properly, as part of a fully integrated tourism offer, one needs to create a -building with facilities that demonstrate the excitement of what is being proposed. The scale of the allocation as identified in the Local Plan is critical to ensuring there is flexibility to provide a multi-dimensional year-round facility whilst also respecting the environmental attributes of the site and being in a position to provide mitigation to off-set potential impacts. The Ark needs to feel like a hive of industry where food production, hi-tech growing and exhibition, real and virtual experiences and access to education and training can all be accommodated. Therefore we need the space to show the process of plant and livestock husbandry through to production. We need to provide a market where local producers and growers can exhibit and sell their wares. We will also want open ground where livestock and growing can be exhibited.

The main message is that whether you are urban or rural in your focus, growing will become relevant as cities develop urban farms and the technologies to do this at scale become available (which they are now on the cusp of). We will exhibit all these things and persuade people that old models of growing and production have developed and that so have many of the economic models which will demonstrate that added value can be created on smaller scales than previously imagined. This is going to be hugely important as it will ensure the removal of the current barriers to entry for this industry (which has traditionally required significant landholdings and had significant start up costs). Eden Westwood aims to promote a completely new picture of an agricultural revolution that Britain should be leading and which will have enormous global influence in both training and products in the export market. The reason that Eden has decided that it wishes to create "The Ark" in this location and with these partnerships is that it provides a stage of scale enough to have national and global influence and, most importantly, it will act as a stimulus to genuine regeneration - offering young people a sense of possibilities they were previously unaware existed, which in turn are in "The National Interest" to promote.

The reality of an undertaking like Eden is that it requires scale, in order to be an integrated year-round attraction. There will be a need to ensure sufficient cover and activities to visit, no matter the weather conditions. By the very nature of the attraction and the growing required to demonstrate and interpret the story, space will be required to ensure that these activities can take place and that there is room to expand operations into different areas, depending on the seasons.

The Eden Project is committed to developing the most sustainable operations and have been heartened by our partners' commitment to the same goals. We are conscious that the site in question is currently farmland. Given our early involvement in the scheme's development, we have been able to insist on the highest ecological and environmental protections, as well as mitigations for flora and fauna – indeed many acres of the future operation will continue to be unbuilt. We believe that educating the visiting public about the environment (in a way that allows a positive demonstration of what can be achieved together) will provide demonstrable mitigations against the change of land usage to enable the scheme.

There will of course be many new jobs created through this which will have a wider, beneficial socio-economic impact.

One of the clear elements that Eden Project has developed over the years is that a publicprivate partnership is the optimal strategy. This applies whether it is in the UK or internationally. When looking for partners, Eden seeks reassurance about access to infrastructure and/or public subsidy, as it ensures that the development is more likely to be successful. It is difficult to deliver substantial leisure/tourism proposals without this type of support, given the low returns. As an example, Eden worked closely with Cornwall Council in the provision of a link road to the Cornwall site, which was subsidised as part of the build programme.

It is a matter of public record that Eden in Cornwall's original structure was a combination of public-private funding. Of the original ca £105M investment, 80% came from a combination of regional development, European and Millennium Commission funding with the remainder financed through bank loans.

That said, the site in Cornwall was extremely challenging (given that it was an active mine up to the point of purchase by Eden) and significant funds were expended in the creation of both the infrastructure to enable and facilitate the site, as well as the facilitation of conditions suitable for construction. Specifically, the main site required raising by more

than 50 feet. These conditions will not be present in Mid-Devon and have enabled the creation of a business plan without some of those restrictions. That is not to say that it will not be challenging in terms of infrastructure, access and construction.

It should also be noted that the sources of funding will be different, as many of the sources of funds available to the Eden Project in the late 1990s are no longer available. Thus, a different approach has been undertaken to start to identify the appropriate funding sources for Eden Westwood. In broad sweep, this will again be a mixed-funding partnership approach.

Despite Eden's status as a charity and social enterprise, we are rooted in being a successful commercial business and no longer received any public funds for the day to day operations. Being a charity or a "not-for-profit" organisation does not mean that we do not aim to make profits / surpluses. Profits are critical for Eden, however, the difference is that we generate our profits for a purpose and all our profits are reinvested into the charitable mission of the Eden Trust.

As such, we see obvious synergies with retail. In simple terms, "Trade" makes the world go round. The difference is that we wish, at scale, to convey sustainable practices in businesses. At Eden we convey the concept of 'your wallet is your weapon' and this can only be done at scale and with the creation of supply chains that support the local area (as demonstrated in Cornwall where more than 75% of our suppliers are local). Good economic growth equates to investment in more far reaching educational programmes – the content that drives positive change in the wider area.

Eden will have a curatorial role at Eden Westwood (across all areas) to ensure that the retail offerings are aligned to the holistic and sustainable values that will be embedded throughout Eden Westwood. We have successfully done this through our supply chain network, and when we have engaged in high profile corporate relationships: Rio Tinto, Asda, Halifax, EDF for example.

The Eden Project

August 2017