

## INTRODUCTION

Mr. and Mrs. Adams are the owners of Greendale House and Greendale Farm near Woodbury Salterton. The extent of their land ownership is shown on the aerial plan, below. The land is in agricultural use.



*Aerial Plan Google ©*

On behalf of Mr. and Mrs. Adams we have reviewed the information set out in the East Devon Local Plan 2020 – 2042 Regulation 19 Consultation Draft and make the following representations with regards to the policy and strategy for the Clyst Valley Regional Park (CVRP).

### **STRATEGIC POLICY WS09: CLYST VALLEY REGIONAL PARK**

The draft East Devon Local Plan 2020 – 2042 provides for the expansion of the existing CVRP. The additional land to be allocated is shown on the draft Local Plan Policies Map.

Strategic Policy WS09 sets out the requirements for development proposals within and adjacent to the expanded CVRP. As drafted currently, the policy dictates that any schemes that do not contribute to the objectives for the CVRP, or which would frustrate their implementation, will be refused planning permission.

## Response

It is recognised that there is some justification for the delivery of a regional park to support strategic growth in the West End of the district that is proposed in other parts of the Local Plan. However, the extent of the allocation as drafted currently is inappropriate and unjustified, for the reasons set out below. Ultimately, there has been a lack of consultation with affected landowners and the proposed expansion is not based on objective evidence or detailed analysis.

A large area of our clients' land at Greendale Farm has been included within the boundary for the proposed extension to the CVRP. Our clients OBJECT to this inclusion and the Local Plan Policies Map in its current form. The decision to include this land within the boundary is not justified as this approach is not based on solid evidence, nor is it the most appropriate strategy to meet the objectives of the CVRP area. First and foremost, it must be noted that there is no public access to this land.

A CVRP boundary assessment was undertaken by East Devon District Council (EDDC) early in 2024. Our clients' land makes up a substantial part of expansion area J2 – Clyst St Mary Farmlands – Grindle Brook. As part of the assessment, officers identified this area as 'Green' i.e. *"the area significantly contributes to, or has potential to significantly contribute to, the achievement of the objectives within this criteria."*

Officers' overall conclusion and reason for including the land was:

*"This area has significant potential to enhance east-west connectivity between Woodbury Common, Woodbury Salterton and the core of the CVRP and Exe Estuary."*

It must be noted that our clients' land is within agricultural use and is not available for public connectivity between Woodbury Common, Woodbury Salterton and the core of the CVRP and the Exe Estuary – there is no public access to this land. It is not possible to use this land to facilitate east to west linkages as there would be inherent conflict between the existing agricultural use and public access, so including this land would be futile – the particular objective of doing so would not be met. As a result, Strategic Policy WS09 and the Local Plan Policies Map as drafted are not considered to be sound as they are not fully justified. The approach to allocating land to expand the CVRP must be credible.

MR. AND MRS. T ADAMS  
REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN 2020 – 2042 REGULATION 19  
CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP

It must also be noted that our clients received no direct contact or information from EDDC on the proposed expansion or intention to allocate their land, which is entirely unreasonable. If the CVRP boundary remains as shown on the draft Policies Map, the application of Strategic Policy WS09, which requires all development proposals within the CVRP to integrate green infrastructure and contribute to the objectives of the CVRP Management Plan, would prevent the owners of Greendale Farm from undertaking reasonable development necessary for agricultural purposes that would otherwise be acceptable in this location.

It is clear from a review of representations made to the Regulation 18 draft of the Local Plan that objections were made to the expansion of the CVRP relating to the inclusion of freehold owned land and the lack of objective evidence and assessment to inform the additional areas to be included. Subsequently, when EDDC consulted on a further draft of the Local Plan (May- June 2024) requests were made by third parties for clarity and better consultation on the proposed expansion, which EDDC has not adhered to. Complaints were also made by third parties about the lack of clear information about the proposals and lack of direct contact with affected property owners. These concerns remain valid and have still not been resolved.

For all the reasons set out above, the strategy for the CVRP is not sound and the boundary needs to be amended to exclude land at Greendale Farm, Woodbury Salterton.