

Introduction

Bell Cornwell represents Dorepark Ltd. Dorepark are the owners of a large area of land at Cat Copse which is located to the east of Clyst St Mary and which is located between the Cat and Fiddle residential park and pub and the West Point arena. The land at Cat Copse is located within the area identified in the draft plan as being the location for the Second New Community. Dorepark consider that their land has considerable potential for residential development alongside associated green infrastructure and pedestrian/cycle links and they have been in discussion with the Council's masterplanners involved in the design of the Second New Community. The emerging masterplan for the area indicates that the Council are likely to identify the Cat Copse land for residential use in a manner similar to that anticipated by our clients. Dorepark therefore have a considerable interest in the proposals set out in the draft plan for future growth in East Devon. On Dorepark's behalf, we have therefore reviewed the draft plan and our observations are set out below.

Strategic Policy PB05: Biodiversity net gain

Strategic Policy PB05 requires that 20% biodiversity net gain (BNG) should be provided as part of all forms of major development. Where this level of provision is unviable, clear evidence to this effect needs to be provided. Any off-site provision should be provided in the immediate locality of the proposed development.

The policy also stipulates that any development which is currently exempt from BNG will still be required to provide an ecological enhancement, commensurate to the scale of development involved.

Response

The requirement to provide 20% BNG is extremely onerous and Dorepark OBJECT to the policy as currently worded. Experience of the current, nationally mandated requirement to provide 10% BNG already demonstrates how difficult the process of delivering BNG is, with very high levels of bureaucracy and delay associated with the process. Doubling this requirement to 20% is only likely to add to the complexity and degree of difficulty with achieving the required level of BNG and to act as a particular disincentive to the delivery of much needed development. It is also considered that the additional requirement to compel currently exempt forms of development to also provide a level of BNG is also unreasonable and will add to an already complex process especially given the ambiguity regarding the degree of enhancement required in such circumstances.

The policy is not considered to be sound. Dorepark consider that this policy has not been positively prepared, is not justified and given the uncertainties surrounding the BNG process, is not effective.

DOREPARK LIMITED
RESPONSE TO THE EAST DEVON LOCAL PLAN 2020 – 2042 (REGULATION 19 PUBLICATION
DRAFT) CONSULTATION (MARCH 2025) BY BELL CORNWELL LLP

Seeking as it does to double the current national requirement, we would also suggest that the policy is not consistent with national policy. BNG is already required to be delivered as a result of national legislation. Given that this requirement will remain and within the context of the concerns outlined above, we would suggest that this policy is unnecessary, unsound and should therefore be deleted.