

## **Introduction**

Bell Cornwell represents the owners of Darts Farm. Darts Farm is a national award winning, unique retail destination with its own and locally produced food at its heart but is also a destination for wellness, the home and garden and the great outdoors. Darts Farm is home to 13 different businesses with 400 people employed on-site and it supports 500 suppliers, most of whom are located in Devon and across the West Country. With close to a million visits a year, it therefore makes a major contribution to the economy of the area.

As an important local stakeholder, Darts Farm has a considerable interest in the future direction of development in East Devon and therefore in the approach proposed in the draft East Devon Local Plan. They have therefore reviewed the draft policies set out within the document and notably *Strategic Policy WS15: Employment Land at Darts Farm* and *Policy SE02: Employment development in the countryside*. Our client has a number of observations on these policies and these 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 Darts Farm 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.

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

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