
East Devon Local Plan Regulation 19 (Phase 1)

Strategic Policy WS09: Clyst Valley Regional Park

Representation by Savills on behalf of Mac Mic Strategic
Land

March 2025

Introduction

1. This representation is submitted by Savills on behalf of Mac Mic Strategic Land (from hereon referred to as 'Mac Mic'). Mac Mic is a strategic land promoter with a strong reputation for delivering planning permissions that lead to high-quality development.
2. Mac Mic has instructed Savills on their behalf to submit a series of representations to the relevant policies of the Regulation 19 Local Plan, including this policy.

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3. It is our understanding that one of the primary functions of the Clyst Valley Regional Park (CVRP) is to act as a Suitable Alternative Natural Greenspace (SANG) which absorbs recreational pressure in acceptable locations physically divorced from European protected habitat with in East Devon. The CVRP is therefore in itself the SANG require to support development which would otherwise exacerbate existing recreational pressure.
4. It is therefore somewhat confusing to include a requirement in Strategic Policy WS094 for development proposals to open *"reduce recreational pressure on environmentally sensitive locations, through the creation of accessible green space and where appropriate suitable alternative natural green space"*. Is it the Council's intention that the SANG required through Criterion D of this policy is in addition to or part of the proposed improvements to the CVRP? Greater clarity is needed to ensure that those promoting development and determining planning applications are fully cognisant of the policy requirements.
5. Furthermore, whilst Mac Mic support the principle of the CVRP and its enhancement through relevant development proposal, any contributions to works within the CVRP from major development must be compatible with Regulation 122 of the Community Infrastructure Levy Regulations. With that in mind it is unclear how Criterion F of the policy will be applied in practice.
6. If for example a proposed development included all necessary open space within the proposed development to adhere to the *Fields in Trust* standards set out in Policy OS02, there would be no planning justification for a contribution towards the delivery of the CVRP targets.



7. Unless greater clarity is provided on the application of Criterion F, we consider it ought to be deleted from the draft policy wording.