

DCAA Representation 1 – Acknowledging the Importance of Devon County Showground

With Reference to *Chapter 1, 2, 3 and 4 of the Local Plan Reg 19 November 2025*

The DCAA **objects** to the omission of any reference relating to the Devon County Showground / Westpoint Arena in the emerging Local Plan. This objection underlines concerns that there has been little or no consideration of the future of the Devon County Showground as community facility and events space of strategic importance to East Devon.

There is no clear acknowledgement that the operational needs of the Showground have been assessed in the emerging local plan policy, supporting text or in the preparation of the evidence base that supports it.

The DCAA also wishes to emphasis the importance of considering and prioritising planning policy that safeguards rural life, farming and rural activities so that the Council can meet their vision by the end of the plan period. Acknowledging the important role of the DCAA and the Devon County Showground will assist in meeting the objectives of the Local Plan.

About the DCAA: Our Purpose and History

The Devon County Agricultural Association (DCAA) and its operation at the Devon County Showground has a proud and distinguished history as a charitable organisation at the heart of Devon life. The Devon County Showground is the South West's premier venue for large-scale events and it serves as the permanent home of the Devon County Show, one of the UK's most significant agricultural events.

Established in 1872, the DCAA promotes and celebrates best practice in farming, food production, and rural industry. Its principal charitable mission is to educate both the public and the agricultural community, ensuring that the farming sector remains vibrant, progressive, and connected to the broader community.

The DCAA organises and supports a range of events that showcase innovation, excellence, and sustainability in agriculture. Its flagship event, the Devon County Show hosted at the Devon County Showground, is a major annual celebration of rural life, bringing together communities, producers, and visitors from across the county and beyond.

Alongside the Devon County Show which attracts over 100,000 visitors each year over three days, there is an extensive annual program of events that take place each year at the Devon County Showground. These events play a significant role for residents of the area and beyond, providing significant benefits to the social, community and economic life of East Devon.

We enclose the latest DCAA Vision 2050 Document for the DCAA which sets out the following ambitions for the organisation over the next 25 years:

- The DCAA wants to deliver a resilient and modernised Devon County Show that reflects best practice in farming, climate adaptation, and biodiversity recovery.

- The DCAA aims to be an outward-looking in a way which reaches across Devon through events, conferences, education, and school outreach.
- To be a financially sustainable charity supported by multi-use infrastructure and year-round event income from Westpoint.
- To provide a civic and cultural hub that engages the local community and contributes actively to the public good.

DCAA Objection to the Reg 19 Local Plan

The DCAA would observe the following as currently drafted:

1. With the Reg 19 local plan, figure 2 'Key Facts' on page 17 acknowledges that East Devon is largely rural. This point emphasises the importance of rural life to the cultural identity for East Devon.
2. The 'Local Plan Vision' para 2.1 (page 21) states that
"by 2042 and beyond East Devon will be a diverse, inclusive and thriving place to live and work and a pleasure to visit and enjoy."
3. Para 2.6 (page 21) goes on to state that
"Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development to meet the needs of local communities. Farming and rural activities will still dominate the use of land."
4. Strategy Policy SP01 point A (page 26) focuses new development at the West End of the district, including a further new community of Marlcombe.
5. Para 4.6 (page 51) extracts text from the technical assessment work and as quoted includes the following:
"As a vibrant and adaptable new community Marlcombe will preserve East Devon's legacy as an outstanding place to live."
6. There is no reference in Policy WS01 'Marlcombe New Community' (page 52) to the potential impacts on the Devon County Showground or its activities. Reference to the potential for impacts on the Showground that need to be mitigated are omitted.
7. We note the "Social, Cultural, Leisure, Health and Community and Education Facilities" on page 57 of Policy WS01 are focussed on provision of new facilities within the New Town designation and make no reference to links to the Devon County Showground as an immediate neighbour or the potential to work collaboratively to safeguard the Showground as a local facility that could also benefit the New Town.

8. We note the mapping used in Figure 7 is the Local Plans only tangential reference to the Devon County Showground and includes a safeguarded access denoted as a 'W'. No explanation or policy reference to the delivery or function of the safeguarded access is present in policy WS01. The DCAA should be consulted to agree the form function and location of this important link.
9. There is no reference within the other 317 page Reg 19 Local Plan to the Devon County Showground as the largest events space in the South West or the important role it plays in East Devon life.

In the context of to the above observations, the DCAA would fully endorse that East Devon is a predominately rural district and rural activities are key to the East Devon way of life. The DCAA believes that the Devon County Showground is a strategic facility supporting the East Devon rural way of life that directly supports the wider Local Plan Vision for East Devon Local Plan.

The emerging allocation of the New Town at Marlcombe is located immediately to the east of the Devon County Showground and the development of a 10,000 house New Town has significant potential to impact on the long term DCAA operations at Devon County Showground. It is clear that the Local Plan as drafted fails to acknowledge the existence of the Devon County Showground. This is of concern to the DCAA in terms of the emerging policy of the local plan. It is also a concern for the robustness of the technical supporting evidence that underpins the decisions taken to allocated land and finalise a development strategy, particularly in the West End area.

Failure to acknowledge or assess the impacts of emerging policy on key strategic infrastructure such as the Devon County Showground does not meet the National Planning Framework (NPPF) tests of soundness as the Plan can be neither justified or effective if key considerations have not been assessed, or factored into policy or the evidence base that underpins it.

The DCAA therefore **objects** to the omission of a policy, or policy wording, or supporting text in the Local Plan that seeks to safeguard the Devon County Showground operation.

For clarity the DCAA does not object to Marlcombe or the wider spatial strategy that focusses development on the West End area. As such the DCAA have submitted representation number 3. We simply want the impacts of this identified development to be balanced against the existing community needs and safeguard strategically important assets like the Devon County Showground in the emerging Local Plan.

DCAA Recommendation

The DCAA would request the inclusion of a specific policy within Chapter 4: Development at West End to safeguard the future of the Devon County Showground as a multi-purpose large format events and community space. The policy would require that all development proposals within the West End be assessed for their impact on the operation of the Devon County Showground and suitable mitigations undertaken if an impact is identified.

If a new policy is not to be considered that explicitly safeguards the Devon County Showground then amendments to policy wording for WS01 are requested to:

- 1) Acknowledge the existence of the Showground and the potential direct and indirect impacts that Marlcombe could have on its ongoing operations and;
- 2) Provide sufficient safeguards that application for development at Marlcombe can not be approved if they have a detrimental impact on the ongoing operation of the Devon County Showground.

DCAA Representation 2 – WS01 Policy for Marlcombe Objection

The DCAA **objects** to the current wording in Policy WS01 as it doesn't provide sufficient clarity on key specific details that could have a significant impact on the long term future of the DCAA's operations at the Devon County Showground.

In support of this objection the DCAA has commissioned Markides Associates to provide an assessment of the traffic and transport related impacts of the WS01 allocation at Marlcombe. This report is appended to assist the Council's consideration of such matters and highlights a number of evidence based matters that need to be addressed to meet the NPPF tests of soundness to justify the inclusion Policy WS01 in the Local Plan.

DCAA Objection to the Reg 19 Local Plan

The DCAA raises the following place-making **objections** to Policy WS01 Marlcombe New Town and the associated Figure 7 Marlcombe Masterplan:

1. The failure of the policy WS01 to acknowledge the Devon County Showground's strategic importance to East Devon (see DCAA representation 1 for more details);
2. The failure of the policy to identifying the direct potential impacts on the Devon County Showground and provide specific mitigations for the development of the New Town to safeguard the long term operations of the DCAA and the Devon County Show.
3. The Councils failure to publish evidence base that assesses the New Town impacts and mitigations or the interactions with the Devon County Showground in land use terms.
4. The failure of the policy wording to reference the purpose and function of the 'W' arrow annotated in Figure 7 as 'safeguarded access to the Devon County Showground'. Direct consultation with the DCAA should be undertaken to establish the delivery of this important piece of infrastructure can be achieved.

The lack of reference to the Devon County Showground in the emerging Reg 19 Local Plan and its supporting evidence base has been explored in representation 1 from the DCAA. The explicit failure of policy WS01 to reference the Devon County Showground undermines the effectiveness of the policy in achieving its vision given the strategic significance of the Devon County Showground to the District's rural way of life, its community and its economy.

The DCAA does not object to the inclusion of a New Town for East Devon but believes the evidence supporting the allocation failed to make any meaningful assessment of the impact of Marlcombe on the DCAA's operation of the Devon County Showground.

The Markides team, working with the DCAA, have robustly assessed the evidence and policy position and their report highlights the following transport related issues:

- Policy WS01 and the development of Marlcombe in accordance with the Figure 7 Masterplan will result in the loss of almost 5,000 temporary parking spaces which support the success of the Devon County Show. Failure to mitigate these losses may result in the Devon County Show ceasing to operate which may have a detrimental effect on the long-term future operation of the Devon County Showground.
- Policy WS01, Figure 7 Masterplan and the emerging evidence base acknowledge the New Town's 'Primary Access Road' is a key transport and access point linking the A30 in the north to the A3052 in the south. The new proposed main access road from the A3052 is only 500m from the Devon County Showground's main access road. We have concerns about the modelling methodology employed thus far of the required Primary Access Road, such that this may have implications for the capacity of this road, the site access junctions with the A3052 and A30, and the constrained off-site network served and influenced by the volume and pattern of forecast traffic.
- Markides highlight high-level transport concerns about the scale and delivery of Marlcombe, including its Transport Vision. The Vision is predicated on enabling significant internalisation of traffic movements. There is a lack of evidence to confirm these aspirations take into account the DCAA operations, or how the major mitigation requirements necessary for phasing of the New Town can be delivered without materially impacting the Devon County Showgrounds operations. The evidence as presented focussed on housing and does not adequately assess employment proposals.
- The evidence base suggests further testing is required to confirm the critical mitigation of the M5 junction 30, the main Marlcombe access junction on the A30, the main A3052/A376 corridor and their intersection at Clyst St Mary Roundabout. At the present time it has not been demonstrated that the network can operate safely and with sufficient capacity, or what mitigation measures are proposed to resolve any issues that Marlcombe will create on the network. This would have direct and significant impacts on the Devon County Showground operations.
- The Markides Team have identified that the traffic modelling work in the evidence base is underrepresenting the existing traffic flows associated with DCS / Westpoint Arena and doesn't model traffic flows appropriately. The DCAA would like to see a comprehensive review of the modelling to ensure the highway network will deliver suitable mitigations taking account of the Devon County Showground operations.

Prior to the publication of the first Reg 19 Local Plan the DCAA had no direct contact with East Devon Council. As such these are the first formal representations made by the DCAA. Since the first Reg 19 Local Plan we note the new inclusion of a 'Safeguarded Access to Devon

County Showground' referenced as 'W' on the Figure 7 plan. The DCAA is not opposed to the opportunity of improved links but it **objects** to the lack of clarity surrounding the purpose of this access and the lack of evidence on how and when this may be used. This access route could assist Marlcombe in mitigating traffic impacts and offer up active travel connections but adequate engagement with the DCAA is required to ensure this is deliverable.

DCAA Recommendation

The DCAA is seeking to safeguard the long term future of the Devon County Showground. The loss of temporary parking capacity along with the traffic and transport impacts of the New Town need to be actively considered by East Devon if their Local Plan is to meet the NPPF tests of soundness.

The significant changes expected to the highway network on the A3052 need to be understood and not prejudice the long-term future of the Devon County Showground.

It is of critical importance to the soundness of Policy WS01 that the transport impacts and the modelling that outlines the future increases in traffic movement is fit for purpose and includes traffic flows from the Devon County Showground. The evidence base must be completed with full cognisance of the DCAA operations at Devon County Showground.

The DCAA would like much greater clarity on the evidence base. This is needed to address modelling deficiencies and provide the information to identify the correct impacts of policy WS01 as well as adequately defining in detail the proposed mitigation proposals for vehicles and non-motorised users for Marlcombe New Town.

Within the Policy WS01 wording we would also like to see two additional points added to safeguard the Devon County Showgrounds future. These are referenced as point Q and point R below to be added to the existing Wider Infrastructure list:

- Q. Safeguard all modes for access to County Showground (for all showground uses) to allow connection on completion of adjacent Primary Access Road including active travel access on completion of adjacent active travel routes.
- R. Coordinate the Transport Strategy and mitigation measures, using all reasonable means to seek agreement with adjacent stakeholders including the County Showground, to ensure that their operation is not unduly affected.

The DCAA would also like to see supporting text or policy wording explaining the function of the 'Safeguarded Access to Devon County Showground' shown as a 'W' arrow on the Figure 7 Masterplan linked to the infrastructure delivery plan and other technical evidence base. It is critical to the successful delivery of this piece of infrastructure that the DCAA and East Devon Council can agree on the location, function and delivery of a timetable to support the New Town and Devon County Showgrounds operations.

DCAA Representation 3 – Policy Support for Spatial Strategy SP01

Prior to the publication of the first Reg 19 Local Plan the DCAA had no direct contact with East Devon Council. As such these are the first formal representations made by the DCAA.

Whilst the organisation has specific concerns relating to the impacts of the WS01 Policy for Marcombe (see Representation 2) they would like to confirm their overall **support** for East Devon Council in meeting the vision and objectives of the emerging Local Plan through delivery of Policy SP01 Spatial Strategy whilst maintaining the Local Plan vision including Para 2.6 (page 21) which states that:

“Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development to meet the needs of local communities. Farming and rural activities will still dominate the use of land.”

The DCAA welcome a constructive working relationship with the Local Plans Team and we would be pleased to meet to discuss an opportunity to address our concerns in any future Local Plan publication or through the EIP process itself.

DCAA Representation 4 – Clyst Valley Regional Park objection WS09

The DCAA **objects** to the current wording in Policy WS09 which seeks to define the extent of the Clyst Valley Country Park designation via the policies map (ref:CSD-002) onto land within the current boundary of the Devon County Showground. If adopted, the policy criteria of WS09 would therefore apply to this land which is arbitrary as drawn and bears no reference to features on the ground.

The DCAA has no immediate plans to seek to develop land or operate differently on the site of the Devon County Showground. Its operations will remain aligned to the latest DCAA Vision 2050 Document (see enclosed) which sets out the following ambitions for the organisation over the next 25 years. This includes:

- The DCAA wants to deliver a resilient and modernised Devon County Show that reflects best practice in farming, climate adaptation, and biodiversity recovery.
- The DCAA aims to be an outward-looking organisation that reaches across Devon through events, conferences, education, and school outreach.
- To be a financially sustainable charity supported by multi-use infrastructure and year-round event income from Westpoint.
- To provide a civic and cultural hub that engages the local community and contributes actively to the public good.

The above DCAA Vision is broadly aligned to the objectives of the current Clyst Valley Regional Park Masterplan. However, should the DCAA seek to submit future applications to supplement the Devon County Showground activities within the designated parts of the site covered by policy WS09, then the restrictions and requirement of the policy could be applied. This feels arbitrary and unjustified when most of the Devon County Showground site is not covered by the designation.

We note the intention of the CVRP review process to look at a significantly bigger area of up to 4,100 Ha of land. The Clyst Valley Regional Park Masterplan was only approved by the Council in 2021 when the Masterplan identified around 2338 Ha of land. The DCAA would support the review of the CVRP boundaries with a view to removing areas highlighted in light green on Figure 1 from the Devon County Showground.

DCAA Objection to the Reg 19 Local Plan

The policy presumption is that planning permission will be refused if the conditions of the policy are not met. The DCAA object to the inclusion of the land (light Green) shown in Figure 1 below being included on the Devon County Showground as it could have unintended consequences for future operational applications.

The DCAA have not seen evidence that supported the drawing of the CVRP boundary onto land within the Devon County Showground. As such the inclusion of the land is not evidenced.

Given the lack of evidence over the sites required inclusion in the CVRP designation, the imposition of a significant number of policy requirements being introduced in the Local Plan cannot be justified. Evidence and Justification for the policy are needed to meet the NPPF tests of soundness.

The DCAA therefore **objects** to the allocations map including poorly defined areas of the Devon County Showground in the policy restrictions for WS09.

DCAA Recommendation

If the map is not amended to exclude the operational areas of the Devon County Showground then the DCAA recommend the following Policy WS09 amendment be included.

At the end of the Policy wording that the following reference is added (as shown in *italics* below):

This policy applies across the whole local plan area including the Cranbrook Plan area *but excluded land within the Devon County Showground.*

To date, the DCAA have had no involvement in the preparation of the current Clyst Valley Regional Park Masterplan. The DCAA respectfully requests future consultation and considered involvement in the changes to boundary of the CVRP to assess and better inform the members of the association and to ensure that the impact on farming aligned to the ambitions of the WS09 policy are fully explored.



DCAA Figure 1 – CVRP Green overlapping with Red Line Boundary