

Introduction

Clinton Devon Estates are the owners of a very large area of land within East Devon. As part of its interests, the Estate undertakes residential and commercial development and manages substantial farming and forestry operations. It is also an important custodian of the area's environment, notably the Pebblebed Heaths National Nature Reserve. The Estate therefore has considerable interest in the future form of development in East Devon.

The Estate has provided representations to the Council as part of previous consultations on the draft local plan and via the related call for sites process. They therefore have considerable interest in the policies and objectives as now set out in the current draft of the plan. On behalf of Clinton Devon Estates, we have therefore reviewed the plan and a number of observations on the policies are set out below.

Strategic Policy SE09: Rural shops outside of towns and villages

Strategic Policy SE09 allows retail development in rural locations outside villages provided it is connected to an existing rural business. In order to be acceptable, such schemes need to meet a number of requirements. Specifically, the policy requires that:

- A minimum of 60% of the products on sale should be produced on-site (Criterion A).
- At least half of the remaining products on sale [i.e. the other 40%] should be produced within East Devon (Criterion B)
- The balance of the products should be from the West Country counties (Criterion C).

Response

As part of a policy governing the development of farm and similar shops, it is entirely reasonable for some restrictions to be placed on the range and source of goods on sale. This is needed in order to ensure that the shops in question do not generate competition with other shops in more sustainable locations and also so that the retail offering they provide can support local suppliers and food growers. However, the approach as set out in the draft policy is extremely restrictive and will have the effect of sterilising the potential for any new rural shops from coming forward. In summary, the policy requires that a minimum of 80% of the goods on sale come from within East Devon, with the balance to come from elsewhere in West Country. This is a wholly unrealistic requirement. It is very likely to have the effect of either rendering the range of goods able to be sold so limited as to make the scheme unviable

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

through lack of suitable stock or/and as a result of the stock being too expensive. Some additional flexibility is needed to allow shops to be set up which sell goods competitively whilst still retaining a strong local focus.

As currently drafted therefore, the Estate considers that Policy SE09 is not sound. Due to its overly restrictive nature, the policy has not been positively prepared and is not justified. The Estate therefore OBJECTS to this policy.

We would suggest that a more viable approach would be to change the policy so that the goods on sale are subject to the following restrictions:

- A minimum of 50% of the products on sale should be produced on site.
- The majority of the remaining products on sale should come from Devon, Cornwall, Somerset or Dorset.