

WADDETON PARK LTD
REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19
CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP

INTRODUCTION

Waddeton Park Ltd is a very well-established and successful local housing land promoter and investor with considerable interest across the district. Waddeton Park Ltd has helped to facilitate new homes, affordable housing and other uses in the area. Specifically, Waddeton Park Ltd has interests in land at London Road, adjacent to the Cranbrook built-up area boundary, which they consider has potential for residential development. We attach a plan that shows this land (please refer to the Framework Plan produced by Clifton Emery Design)

Given the nature of their long-standing interests across the district, Waddeton Park Ltd is an important local stakeholder and is interested in the proposals in the East Devon Local Plan for future development in the district.

Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations.

CHAPTER 4. DEVELOPMENT AT THE WEST END

Strategic Policy WS09: Clyst Valley Regional Park

The draft East Devon Local Plan 2020 – 2042 provides for the expansion of the existing Clyst Valley Regional Park (CVRP). The additional land to be allocated is shown on the draft Local Plan Policies Map.

Strategic Policy WS09 sets out the requirements for development proposals within and adjacent to the expanded CVRP. As drafted currently, the policy dictates that any schemes that do not contribute to the objectives for the CVRP, or which would frustrate their implementation, will be refused planning permission.

It is recognised that there is some justification for the delivery of a regional park to support strategic growth in the West End of the district that is proposed in other parts of the Local Plan. However, the extent of the allocation as drafted currently is inappropriate and unjustified, for the reasons set out below. Ultimately, there has been a lack of consultation with affected landowners and the proposed expansion is not based on objective evidence or detailed analysis.

Parts of our client's land to the south of London Road have been included within the boundary for the proposed extension to the CVRP. Our client OBJECTS to this inclusion and the Local Plan Policies Map in its current form. The decision to include this land within the boundary is not justified as this approach is not based on solid evidence, nor is it the most appropriate strategy to meet the objectives

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of the CVRP area. First and foremost, it must be noted that there is no public access to this land at present, nor would any be permitted, so key objectives of the CVRP would not be met by designating this land.

A CVRP boundary assessment was undertaken by EDDC early in 2024. Our clients' land makes up a small part of expansion area G2 – Rockbeare and Rockbeare Manor. Area G2 covers a very large area, which stretches from the London Road in the north west all the way down to the A30. As part of the assessment, officers identified this area as 'Green' i.e. *"the area significantly contributes to, or has potential to significantly contribute to, the achievement of the objectives within this criteria."*

Officers' reasoning for including this area in the CVRP designation appears to be due to the extensive Registered Historic Park and Garden surrounding Rockbeare House (Listed Building) and remnant historic parkland at The Grange, which fall within this area, and the area's rural character. No particular reason is given for including the land immediately to the south of London Road, which has no heritage value and is viewed very much in the context of the Cranbrook new town – the inclusion of the two small areas of land has not been justified and is not based on solid evidence. As a result, Strategic Policy WS09 and the Local Plan Policies Map as drafted are not considered to be sound. If the CVRP boundary remains as shown on the draft Policies Map, the application of Strategic Policy WS09, which requires all development proposals within the CVRP to integrate green infrastructure and contribute to the objectives of the CVRP Management Plan, could prevent development coming forward in the immediately vicinity of Cranbrook, in a very sustainable location, which could otherwise be delivered without harming the strategic objectives of the Local Plan.

It is clear from a review of representations made to the Regulation 18 draft of the Local Plan that objections were made to the expansion of the CVRP relating to the inclusion of freehold owned land and the lack of objective evidence and assessment to inform the additional areas to be included.

Subsequently, when EDDC consulted on a further draft of the Local Plan (May- June 2024) requests were made by third parties for clarity and better consultation on the proposed expansion, which EDDC has not adhered to. Complaints were also made by third parties about the lack of clear information about the proposals and lack of direct contact with affected property owners. These concerns remain valid and have still not been resolved.

For all the reasons set out above, the strategy for the CVRP is not sound and the boundary needs to be amended to exclude land that immediately adjoins London Road (to the south) so that its potential to provide development in a very sustainable location can be realised.