



CLINTON DEVON ESTATES

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By email: planningcentral@eastdevon.gov.uk

Dear Mr Roberts,

20/2089/MFUL – 151 hectares of land within the parishes of East Budleigh, Budleigh Salterton and Otterton from Lime Kiln Car Park (SY072819) to South of Frogmore House (SY074850) (The Lower Otter Valley)

Clinton Devon Estates is in full support of the Environment Agency's planning application 20/2089/MFUL in respect of delivering the Lower Otter Restoration Project, which forms the UK's contribution of a pilot site to the joint PACCo (Promoting Adaptation to Changing Coasts) Project with our French partners in the Saône Valley in Normandy.

The Estate's 2030 Strategy is focussed on adapting our land use to meet the challenges and opportunities brought about by a changing climate, the most significant reform of agricultural policy since the Second World War, and society's increasing demand that we look after our environment by working with nature, not against it. The LORP project, and this application, we believe, are aligned well with our Land Use Strategy and will support our progress in achieving key outcomes as measured by the UN's Sustainability Goals.

The Estate takes a very long term, inter-generational perspective on change. In 1811/12 the Estate realigned the Lower River Otter to provide additional agricultural land to support food production at a time when this country was under the threat of blockades and potential invasion. From our archives we understand that there was quite a lot of concern from local people about these plans; at the time the concerns were about moving from inter-tidal habitat to agricultural land, the opposite of the concerns now. The irony is not lost on us.

Ever since 1812 the River Otter has been trying to reconnect with its flood plain, as nature does. Agricultural activity has not been the most optimal, with diesel pumps used to drain

the land, until relatively recently. Across the catchment – indeed across catchments everywhere - agricultural activities within the floodplain have contributed to a less than ideal environmental status of the river. This includes water pollution from cattle slurry and chemicals, including fertilisers.

On top of this, climate change and altered weather patterns, including more frequent severe storm events, have increased the risks of a sudden, unplanned, breach of the 1812 man made embankment. This occurred in the 1950s with significant damage to the embankments; again in 2012 and most recently in 2018. With the latter it was only due to immediate action of the Environment Agency and significant expenditure of public money that the breach was repaired. If this hadn't occurred the whole area would have been inundated by sea water and unable to drain. Part of the South West Coast Path would have been lost; the cricket club would have been lost; the tip would have been exposed to erosion unprotected; South Farm Road would now be tidal; all the hedgerows and trees would be dead. This is the reality that faces the Lower Otter Valley and which the application is trying to address.

This application, and the LORP project, will result in proactive, science-based action, in harmony with nature, returning the land to something near its pre-1812 state and adapting it to be ready to face up to predicted climate change impacts. The project completely underpins UK Government policy, most notably the 25 Year Environment Plan and the recommendations of the Committee for Climate Change. National and local strategies supported include: HM Government Flood and Coastal Erosion Risk Management Policy Statement (July 2020); East Devon District Council's (EDDC) Climate Change Strategy (priorities 6,7,8,9 &10); Devon County Council's Climate Change Strategy; EDDC's Climate Emergency Declaration.

This project also supports the Estate's agricultural strategy by ensuring that farms within the LORP footprint, facing significant reductions in taxpayer subsidy post BREXIT and enhanced regulation in terms of pollution, and therefore, in themselves risks to their viability, can be supported in their transition to more productive agriculture and an ability to deliver enhanced environmental outcomes and other benefits for society. This will put them in a good place to take advantage of the Government's new Environmental Land Management Schemes being developed (and tested on the Estate in the Lower Otter Valley) and which should be in place shortly after the LORP and PACCo has been delivered. The Estate is finalising arrangements to invest in farm infrastructure to reduce the risks of pollution and also provide security of tenure on equivalent areas of productive land which exceeds the agricultural land being used to deliver the scheme. This application facilitates this investment in infrastructure and land, which otherwise would not be available. Indeed, overall, the Estate is committing many hundreds of thousands of pounds, investing in its farms and the delivery of this project.

This application, as well as supporting a long term, positive future for the valley's farming operations, supports residents and existing businesses at South Farm by the construction of a road which does not flood. It provides purpose built parking spaces, removing illegal

parking on the Site of Special Scientific Interest and providing a much better visitor parking experience, appropriate to the site. Through the provision of funding it enables the delivery of a brand-new, sustainable, exemplar cricket club for Budleigh Salterton. It significantly reduces the risk of pollution from the old refuse tip, which would potentially be a major pollution hazard in future months and years.

If this application by the Environment Agency is refused, or even deferred, then the EU funding will not be available to deliver such very important outcomes for nature and society. Indeed, as it is a joint project, the French element of the project (PACCo) will not go ahead either. This outcome would be a tragedy and something future generations in this country and internationally will not thank us for.

If not us, then who? If not now, then when? East Devon has the chance to demonstrate leadership on an international stage if this project is delivered. There is a very small window of opportunity to capitalise on significant European funding, whilst it remains available.

So, in summary, we believe that there are only two alternatives for the Valley's future. The first is the current proposition, which the application delivers: a managed transition to inter-tidal habitat with community assets protected to the best of our ability and protected species impacts and habitat losses mitigated for, aiming for net gain in biodiversity. The second, is an unmanaged catastrophic transition to poorly drained inter-tidal habitat with none of these protections in place. The view that the existing pastoral landscape can exist far into the future is a fallacy.

As we are aware from the concerns expressed in 1812 by local residents, change is difficult and uncomfortable for many. We understand this. There may be sadness about losing a much-loved pastoral scene. It is difficult for us too, as long-term owners and managers of this land. What we do know is that we are playing our part and doing our duty for future generations. At the end of the day, the Lower Otter Valley will remain a beautiful valley. It will have transitioned, with human help, to be a more natural valley, in tune with nature and the climate. It will be a more accessible valley, a more biodiverse valley, with farming and land management more aligned with positive environmental outcomes, better able to adapt to climate change and we will confidently be able to say that a whole range of catastrophic risks have been mitigated.

Yours sincerely,



John Varley OBE TD
Estate Director