

 **National Trust**

[Representor No: 521]

East Devon Local Plan Examination

Comments on August 2015 evidence and
October 2015 Proposed Changes

Statement prepared by: Michael Calder BA MA MRTPI

19 November 2015

1. Introduction

August 2015 evidence and October 2015 Proposed Changes.

1.1 This statement sets out the comments of the **National Trust** on the following August 2015 Examination evidence and October 2015 Proposed Changes:

PSD2015x - [National Trust Growth Points Prospectus August 2015](#)

PSD2015y - [Statement of Common Ground, Cranbrook August 2015](#)

Change 04 - (para 7.13) - Clyst Valley Regional Park

Change 05 - (Clyst Valley map)

These comments follow the Trust's representation to the Examination Hearing session on the West End on 6 March 2014.

2. Background

2.1 Strategy 10 of the East Devon Local Plan, *Green Infrastructure in East Devon's West End*, is subdivided into two sections; one on the **Clyst Valley Regional Park**, a 'landscape scale strategic project'; and a separate section on **Habitats Regulations and West End Development**, with a reference, since 2014, to the 'South-East Devon European Mitigation Strategy'.

2.2 The South-East Devon European Mitigation Strategy (SEDEMS) prepared by Footprint Ecology in 2014 forms part of the evidence base [Core document - [Env038A - South East Devon European Site Mitigation Strategy](#).] That document makes clear that the Clyst Valley Regional Park (CVRP): is '*an existing project,*' and; '*a landscape enhancement project with SANGS provision incorporated within the wider project objectives.*' (para 7.19).

2.3 Both the Local Plan (including **Change Ref: 04**) and SEDEMS make clear the importance of CVRP in its own right, as a landscape scale strategic project, which is to deliver a wide range of objectives, not just those related to SANGS.

2.4 Paragraph 7.10 of the Local Plan signals that: '*Green Infrastructure is seen as an essential part of the vision for a long-term sustainable future for the Exeter and East Devon Growth Point area.*' **Strategy 10** then states that the Council will 'ensure' that '*the Green Infrastructure Strategy for East Devon's West End*' provides '*a green framework within which strategic development occurs.*'

2.5 However, it is unclear by which process the Council will 'ensure' the provision of a green framework and how it will set out the requirements to be delivered through the CVRP. Habitats mitigation, in itself, will not ensure '*a green framework within which strategic*

development occurs'. The delivery of SANGs, potentially provided directly by individual developers, may be piecemeal and fragmented. It has not yet been adequately demonstrated how the barriers to existing green infrastructure will be overcome, and how new areas of green infrastructure will be created as part of an integrated framework.

3. August 2015 evidence and October 2015 proposed changes:

3.1 The **Statement of Common Ground** (27 August 2015) between EDDC and East Devon New Community Partners, which has been included as Examination Evidence [PSD2015y - [Statement of Common Ground, Cranbrook August 2015](#)], highlights under 'Matters of Agreement' the National Trust's commitment to exploring the opportunities provided by Killerton estate in developing green infrastructure initiatives in relation to the Growth Point, as set out in its letter to the New Community partners dated 3 July 2015 (included as Appendix 2 to the Statement of Common Ground). It also highlights the Trust's preparation of a 'Prospectus for Action' (para 3.12). The **A Prospectus for Action** report, which was prepared by Land Use Consultants (August 2015), has now been submitted by East Devon District Council to the Examination as evidence: PSD2015x - [National Trust Growth Points Prospectus August 2015](#)

3.2 **A Prospectus for Action** makes clear in relation to the Trust's position that:

*'It is important to emphasise that, while the Trust has much to offer its partners in terms of its natural assets, expertise and powers (particularly its power to declare the inalienability of land), it has the right to expect high levels of commitment in return. **The Trust's involvement in delivering green infrastructure to the Growth Point should be seen as a 'whole package' of integrated measures and not just a 'pick and mix' menu.***

(Land Use Consultants, *A Prospectus for Action*; Page 12)

3.3 The Trust's letter to the New Community partners dated 3 July 2015 makes clear that whilst it is committed to developing the opportunities provided by Killerton estate as a recreational asset for existing and future communities it continues to stress the need for Cranbrook to look beyond its boundaries, and be developed in the context of landscape scale green infrastructure projects. The Trust's involvement is based on any proposals forming part an integrated framework of measures that are to be comprehensively delivered.

3.4 **A Prospectus for Action** makes clear the urgent need for a Growth Point Green Infrastructure Masterplan and the key measures that should be addressed by such a Green Infrastructure Masterplan. At the Examination Hearing session on the West End on 6 March 2014, the National Trust stressed the importance of the future Masterplanning of the CVRP, and this was reiterated in the Trust's comments on the Proposed Changes to the Local Plan in June 2015.

- 3.5** In light of *A Prospectus for Action*, which now forms part of the Examination evidence base, and given the policy intent of Strategy 10, to ensure a ‘green framework within which strategic development occurs’, in order to pass the soundness test of effectiveness, the local plan still needs to set out a clear commitment, in support of Strategy 10, to develop a Green Infrastructure Masterplan. Such a masterplan needs to not only specify the location and design of necessary infrastructure, but also quantify the cost and sources of funding, and provide clarity over the contributions to be required from developers.
- 3.6** The CVRP discussion document prepared by East Devon District Council and presented to its Green Infrastructure Board in March 2015 should be developed into a costed Green Infrastructure Masterplan for the whole growth point. High quality green infrastructure already exists on the Killerton estate at Killerton House and Park, Ashclyst Forest, on the 25km of permissive footpaths and 22km of permissive bridleways, and at other sites such as Broadclyst Community Farm and Danes Wood. But, as the *A Prospectus for Action* points out, this existing green infrastructure will not be properly accessible to the residents of Cranbrook unless significant barriers are addressed (not least the railway line). It is critical that a masterplan considers what new routes are required out of Cranbrook, and other Growth Point sites, to the surrounding greenspace, especially as regards crossing points of the rail line. Furthermore, the *Prospectus*, in Appendix 2, points to a deficiency of smaller greenspace sites (20ha or less) within 300m, 880m and 2km of Cranbrook based on Natural England’s Accessible Natural Greenspace Standards.
- 3.7** The Trust considers a Green Infrastructure Masterplan to be a necessary prerequisite to its involvement. A masterplan should guide and inform individual proposals as part of an integrated whole and ensure necessary access links to individual sites are provided. In preparation for the opportunities that may be afforded through such a process the Trust has sought to identify sites which might meet the appropriate site criteria for SANGs, and Footprint Ecology have produced for the Trust the forthcoming report; *Opportunities for Suitable Alternative Natural Greenspaces sites (SANGs) on the Killerton Estate*. The Trust hopes to submit the final version of this report to the Examination as evidence before the end of November.
- 3.8** The areas of opportunity for SANGs provision on the Trust’s estate that are considered in the forthcoming report are now shown on the Local Plan map on Page 48 (**Change Ref: 05**). The Trust has already been actively exploring these opportunities with key stakeholders. The Trust notes that the *Statement of Common Ground* states that; ‘the expansion of recreational uses within the Estate and Forest presents a substantive option for the identification and delivery of SANGs’ (para 3.13). However, the Trust wishes to make clear that at this stage that there remains great deal of uncertainty over what would be deliverable on the Trust’s estate as SANGs. SANGs are generally highly expensive, in terms of both up-front costs and on-going management.¹ The Trust requires the recreational facilities provided on its estate sites to be ‘sustainable’ and therefore economically viable for the long term, but it is as yet unclear if the infrastructure and funding required to meet such aspirations, particularly in relation to Ashclyst Forest, can be provided through SANGs. Farmland to the south of the estate may be suitable as SANGs but that needs further consideration and is subject to negotiations with tenants.

¹ Footprint Ecology, *Opportunities for Suitable Alternative Natural Greenspaces sites (SANGs) on the Killerton Estate*, forthcoming; Para 2.12.

4. The Trust's Recommendations:

4.1 The Trust's Recommendations:

Further clarification is required as to whether SANGs funding would be able to meet the Trust's aspirations for developing sustainable, and economically viable, green infrastructure on the Killerton estate, particularly in relation to Ashclyst Forest.

Separate from the issue of habitats mitigation is the need for an integrated framework of green infrastructure measures for the Growth Point by way of a Green Infrastructure Masterplan. In order to pass the soundness test of effectiveness the East Devon Local Plan still needs to set out a clear commitment, in support of Strategy 10, to develop a Green Infrastructure Masterplan, that not only specifies the location and design of necessary infrastructure and access links, but also quantifies the cost and sources of funding and provides clarity over the contributions to be required from developers.

Reference Sources

PSD2015x - [National Trust Growth Points Prospectus August 2015](#)

PSD2015y - [Statement of Common Ground, Cranbrook August 2015](#)

[Env038A - South East Devon European Site Mitigation Strategy.](#)