

**Examination of the New East Devon Local Plan 2006-26
Hearing Session Number 18 – West End**

**East Devon District Council Written Statement for
Thursday 6 March 2014**

At the request of the Inspector, East Devon District Council has produced this supplementary paper to inform the discussion at Hearing Session Number 18 – West End.

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The delivery of the Clyst Valley Regional Park

1. Summary

1.1. Strategy 10 allocates 1,900ha of land to form the Clyst Valley Regional Park. This allocation is required to deliver a number of other strategies of the Local Plan, including:

- 3 – Sustainable development, and particularly 3(c) recreational space and 3(e) education and training;
- 4 – Balanced Communities;
- 5 – Environment;
- 5B – Sustainable Transport;
- 9 – Major Development at East Devon’s West End;
- 11 – Integrated Transport and Infrastructure provision at East Devon’s West End;
- 43 – Open Space Standards;
- 47 – Suitable Alternative Natural Green Space; and
- 49 – The Historic Environment.

1.2. It is not the intention that the whole strategy area becomes public open space in the conventional sense of a park. Neither does the strategy rely on land purchase by the Council or other public body, although that does remain an option. It is the intention that up to 380ha of land within the strategy area will become available for new public access in perpetuity and that by linking the existing, extensive network of paths and lanes, a substantial enhancement of the amount, quality and diversity of open space can be delivered.

1.3. Access to the countryside brings widespread benefits including health, education, inspiration, and mental well-being.

1.4. The strong public-private partnership that exists within the Growth Point has already delivered significant new green infrastructure, including 52.2ha of public open space, the strategically critical Redhayes Bridge cycle/foot crossing of the M5, and 5.4km of associated cycle/footway.

- 1.5. The Clyst Valley Regional Park is needed as Suitable Alternative Natural Green Space (SANGS) to mitigate the recreational impact of additional visitors on the protected European wildlife sites of the East Devon Pebblebed Heaths and the Exe Estuary. A number of existing assets make the area an ideal candidate as SANGS, not least more than 100km of Public Rights of Ways and permissive trails, and open access to 434ha of the National Trust Killerton Estate.
- 1.6. We support the National Trust's request for the boundary to be enlarged to encompass Killerton, Ashclyst Forest, White Down & Paradise Copse. It is a priority of both our organisations to enhance these key recreation, landscape and wildlife assets, and encourage the new community at Cranbrook to make full use of them.
- 1.7. Green infrastructure has been funded predominantly through Government grants and Section 106 obligations. These sources will continue to be used, though if the Council's Community Infrastructure Levy (CIL) is approved, European wildlife site mitigation (including SANGS) will be delivered by CIL receipts. The Council is pursuing a strategy of 'top-slicing' CIL payments for this purpose, as Exeter City Council has done.

2. European Site Mitigation

- 2.1. The South-East Devon European Site Mitigation Strategy¹ sets out a package of measures to mitigate the impacts of development on the East Devon Pebblebed Heaths and the Exe Estuary. These include on-site measures such as visitor management and signage, cross-site measures such as wardening, and off-site measures such as the provision of SANGS. In the short term, on-site measures will be prioritised.
- 2.2. The creation of alternative sites to divert visitors away from sensitive sites has been used in the Thames Basin and Dorset. A set of criteria produced by Natural England has been incorporated in some local plans. However, each SANG will need to be designed to mitigate site-specific impacts.
- 2.3. In the case of the East Devon Pebblebed Heaths, 80% of visits are made by car, with half of all car drivers living within a distance of 10.6km. Dog walking is the most popular activity, accounting for 40% of visits, followed by 34% for walking. Nearly 70% of visitors came at least weekly, and 85% stayed between 1-3 hours. Visitors were attracted, inter alia, by the convenience to home, adequate car parking with no charges, the variety of footpaths, no restrictions on dogs, and the natural environment of the area.
- 2.4. The Exe Estuary is used extensively by local residents, with people living within 1km visiting roughly every other day. The majority of visits are for walking (41%), dog walking (14%) and wildlife watching (13%). Cycling is the most popular activity with Exeter residents.
- 2.5. To be successful as a SANG, the Clyst Valley Regional Park (CVRP) will need to replicate this experience. However, work in Dorset suggests that having a choice of nearby alternative green space is more important than providing a single large green

¹ Local Plan Library Reference CD/Env038

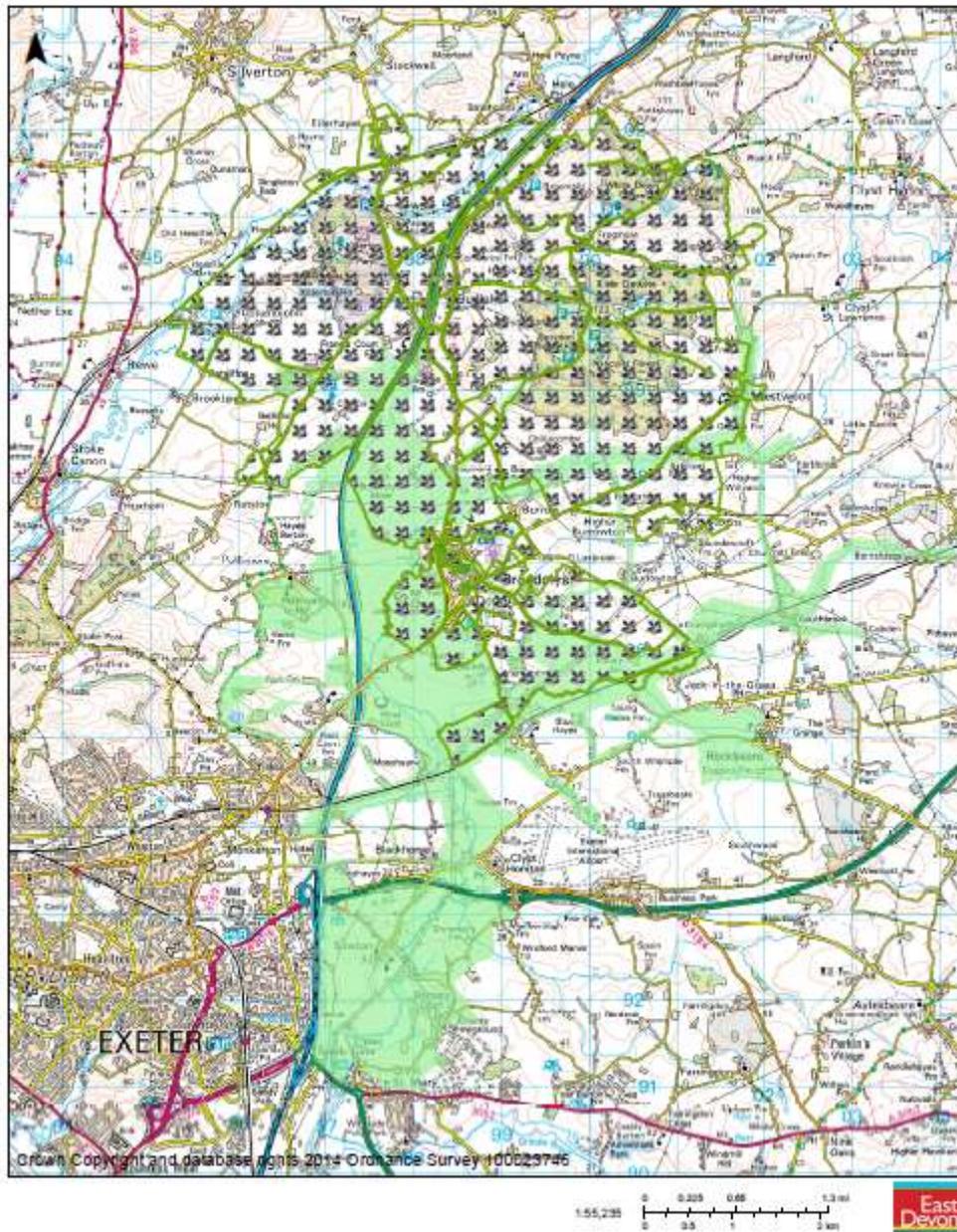
<http://www.eastdevon.gov.uk/env038-footprintecologysedevoneuropeansitemitigationreport.pdf>

space next to sensitive wildlife sites. Natural England’s guidance suggests that SANGS may be created from existing open space with no or limited public access, or open space that is already accessible but which could be made more attractive to visitors. The Council is confident that walkers and dog walkers can be enticed away from sensitive sites through the provision of new pockets of land, linked via an enhanced Public Rights of Way network. As new residential development is permanent, the mitigation secured will need to function in perpetuity.

3. **Strengths of the Clyst Valley Regional Park**

3.1. The 2,590ha National Trust Killerton Estate covers a large part of the proposed CVRP (see Figure 1 below). The Trust supports the aims of Strategy 10 and is working with the Council to deliver it. Specifically, the Trust is helping to deliver a cycle linkage from Cranbrook to Broadclyst, which will then link into their off-road trail to Killerton. The Trust is also keen for a footpath linkage from Cranbrook to Ashclyst Forest, coupled with visitor enhancements within the Forest to enable a sustainable increase in visitor numbers.

Figure 1: National Trust Killerton Estate (acorn) & Clyst Valley Regional Park (green)



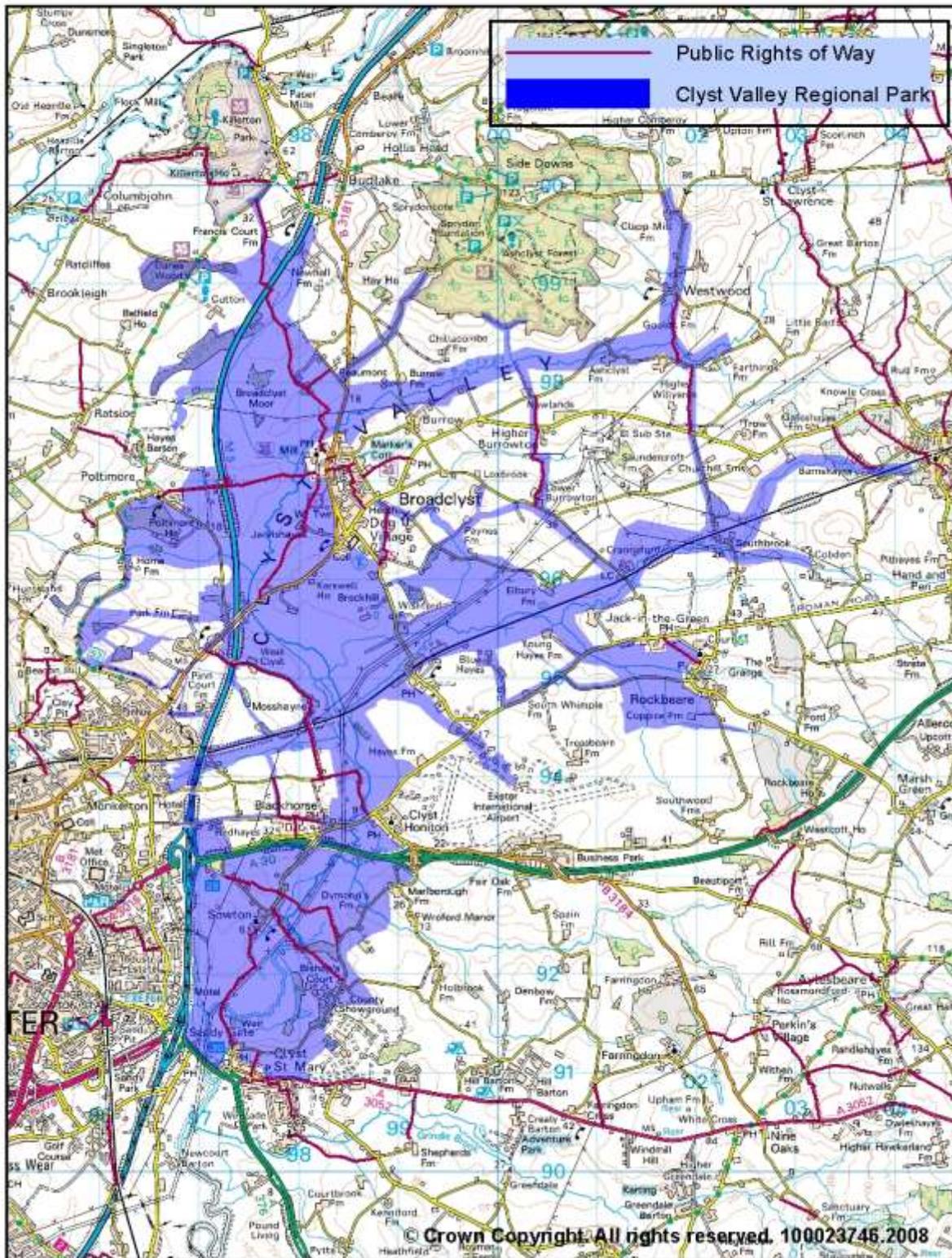
3.2. There are a number of features which make the policy area an excellent candidate as Alternative Natural Green Space:

- ✓ An existing network of more than 100km of footpaths and bridleways;
- ✓ National Trust properties at Ashclyst Forest (272ha), White Down & Paradise Copse (74.5ha) and Danes Wood (14.5ha) with open access (dogs permitted to the majority), free car parking and, at Killerton (73.3ha), toilets, shop and cafe;
- ✓ A choice of trails within Ashclyst Forest ranging from 2.4km to 11.3km, and including a 3.5km butterfly trail suitable for wheelchairs and buggies;
- ✓ A 1.5km play trail at Killerton;
- ✓ Cycle routes, including a 5km family off-road trail from Broadclyst to Killerton, and further 5km route around Killerton;
- ✓ A range of natural features including woods, parkland, grassland, ponds, streams and rivers.

3.3. Figure 2 shows the existing Public Rights of Way². This plan serves two purposes. Firstly, it can be seen that the proposed Clyst St Mary to Killerton Greenway (see 4.4 below) substantially exists; a relatively small number of links in the chain are missing. Secondly, the 'tendrils' of the CVRP indicate where links can be made to Ashclyst Forest, Killerton, and Danes Wood, where public access already exists, and to the parklands of Poltimore, Rockbeare and Cranbrook, where access can be negotiated.

² Please note that an extensive network of permissive paths on the Killerton estate is not shown.

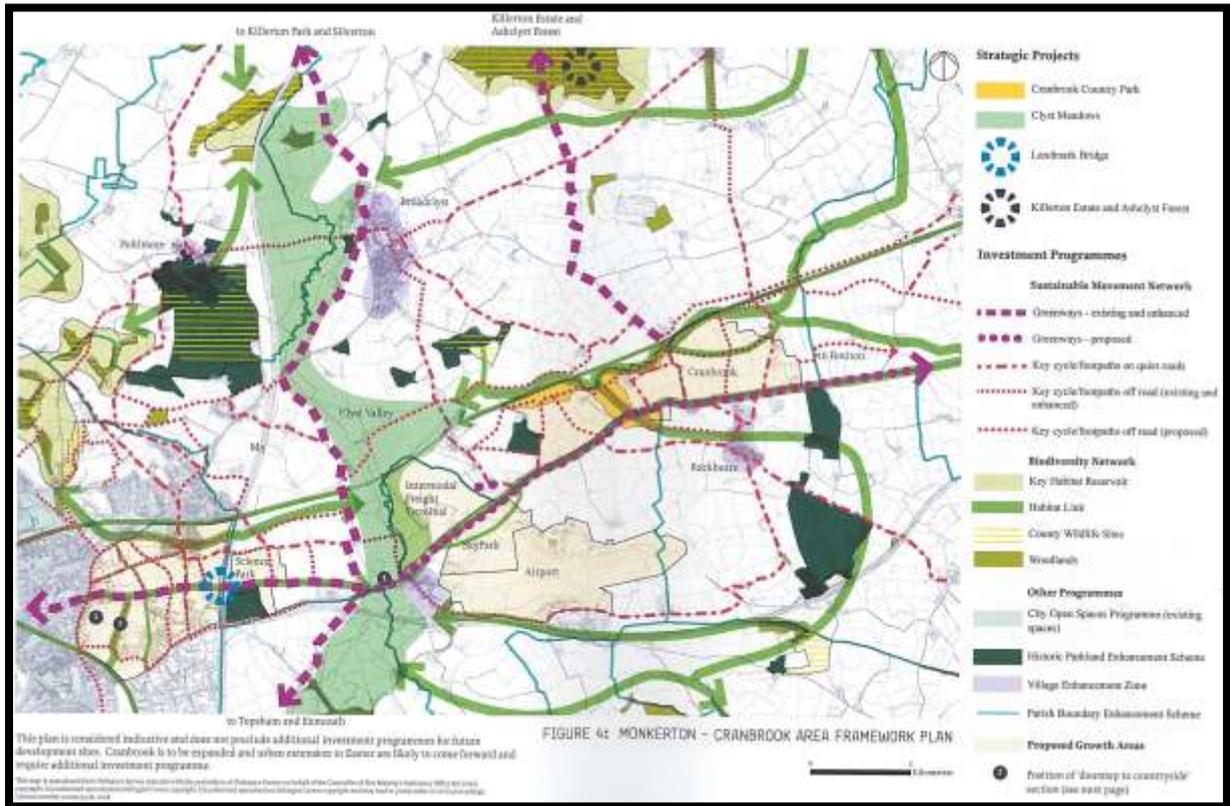
Figure 2: Clyst Valley Regional Park & existing Public Rights of Way



4. Enhancement of the Clyst Valley Regional Park

4.1. A Green Infrastructure (GI) Strategy was published in December 2009³. The GI Strategy was sponsored by EDDC, Exeter City Council, Teignbridge District Council & Natural England, in partnership with Devon County Council. It was commended by the Royal Town Planning Institute in 2010. Developers have been using the document to plan the layout and type of green space in their applications.

4.2. The plan below is taken from the GI Strategy and sets the Clyst Valley Regional Park in context. The delivery of the projects set out in this plan is being managed by a GI Board, with member representation from all the local authorities, statutory agencies, National Trust, Devon Wildlife Trust and private sector.



4.3. Substantial progress has already been made towards full delivery, as detailed below. Each project is shown by its corresponding letter on Figure 3.

³ Local Plan Library Reference CD/Env015

<http://www.eastdevon.gov.uk/env015-greeninfrastructurestudyphase1-chap1-5.pdf>

<http://www.eastdevon.gov.uk/env015-greeninfrastructurestudyphase1-chap6-9.pdf>

<http://www.eastdevon.gov.uk/env015-greeninfrastructurestudyphase1-appendices1-10.pdf>

<http://www.eastdevon.gov.uk/env015-greeninfrastructurestudyphase2.pdf>

4.4. A: Clyst-Killerton Greenway

The principal aim is to link several kilometres of existing footpaths and/or bridleways to form a north-south trail between Clyst St Mary and Broadclyst. Negotiations are underway to re-establish permissive cycle access along Mosshayne Lane.

4.5. B: Cranbrook Country Park

26.2ha of accessible public open space is being delivered, with footpaths for walkers and dog walkers set in a landscape of grassland, stream, trees, woods and orchards.

4.6. C: East Exeter, Cranbrook and Feniton (ECF) Greenway

The central 4.5km of this cycle/foot path from Cumberland Way (East Exeter) to Cranbrook has already been delivered.

4.7. D: Airport to ECF Greenway

The bulk of this route has been delivered.

4.8. E: Pin Brook Corridor

Part of this project has been secured through outline planning consent at Tithebarn Green (allocation W213), providing public access and habitat enhancement on a 1.3ha section of Pin Brook.

4.9. F: Clyst Tributary Habitat Links

Some delivery has already been secured through agri-environment agreements and Catchment Sensitive Farming grants.

4.10. G: Redhayes Parkland Enhancement

This 5ha park has been secured through the development of Science Park.

4.11. H: Poltimore Parkland Enhancement

Negotiations are advanced to secure public access, natural and heritage enhancements to 30ha of the historic Poltimore Park. The total on-site 'natural and semi-natural green space' provision in the outline planning application for Old Park Farm Phase 2 (allocation W210 Northern Part) is an additional 7ha.

4.12. I: Rockbeare Parkland Enhancement

This project will be progressed prior to the Eastern Expansion Site at Cranbrook. The park is 55ha in extent.

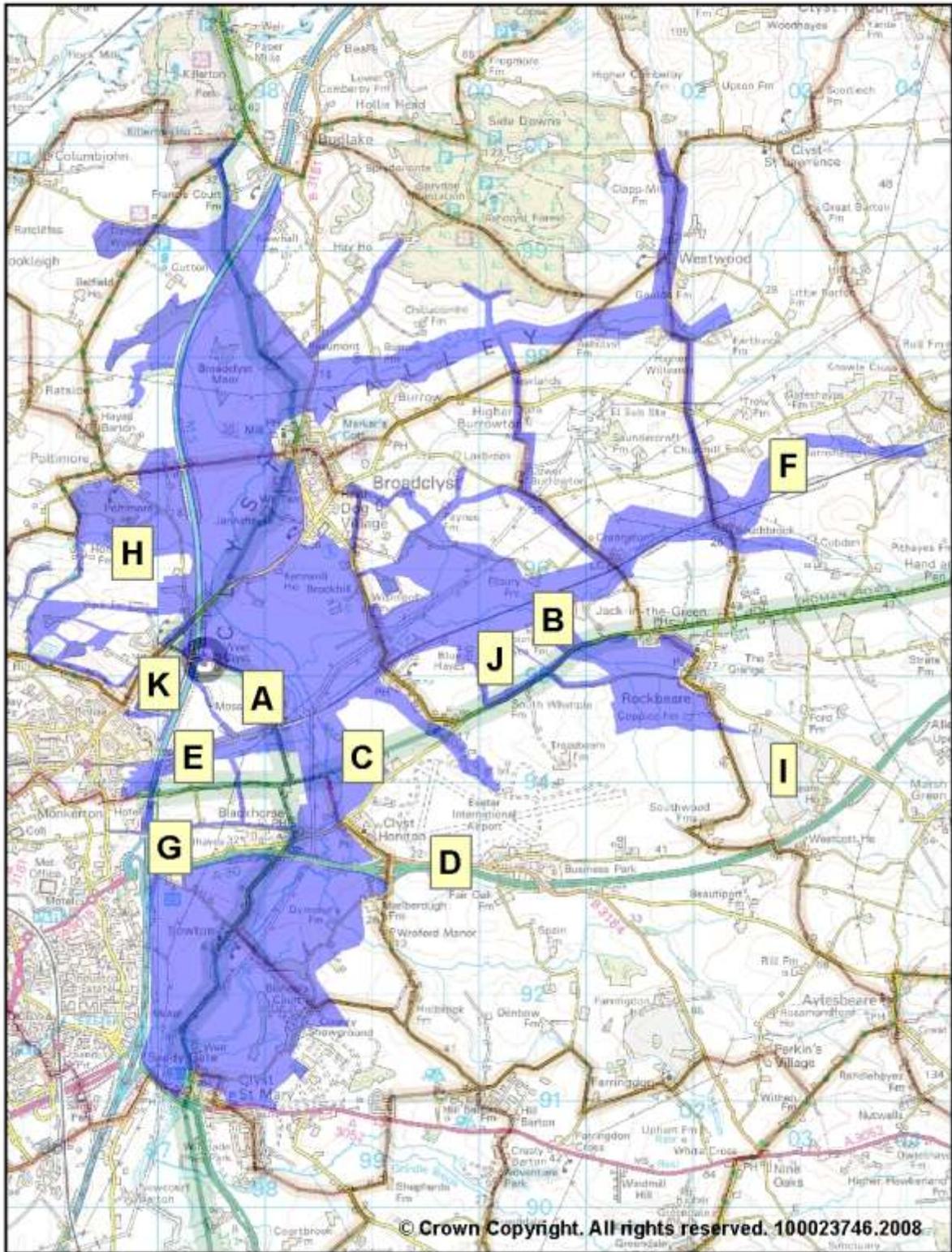
4.13. J: West and North West Cranbrook Parkland Enhancement

This project will be progressed prior to the Western Expansion Site at Cranbrook. The parkland is 6ha in extent.

4.14. K: Pinn Court Farm

An outline planning application at Pinn Court Farm (allocation W113) has been submitted with provision for public access to an on-site Local Nature Park of 8ha.

Figure 3: Delivery of strategic projects - Green Infrastructure Strategy Phase 2
Sustainable Movement Network shown as brown & green lines



5. Deliverability

- 5.1. As a general guide, NE suggest that 8ha of SANGS will be needed per 1,000 head of population. The anticipated delivery of new dwellings in EDDC that fall within the Pebblebed Heaths and Exe Estuary SANGS zone is 10,999⁴. If we assume occupancy of 2.22 per home, this equates to 24,418 people and a total requirement for 195.3ha.
- 5.2. In SANGS zone C (Map 20, p.210 of Reference CD/Env038) there are 3,675 dwellings allocated in the local plan that are yet to gain planning permission. This equates to a guideline SANGS provision of 65.3ha.
- 5.3. Approved and submitted major housing applications in the West End for a population of 17,278 people has secured, or (in the case of pre-application submissions is on track to secure) 92.8ha of public open space, of which 49.7ha is 'natural and semi-natural green space' and fulfils the criteria of SANGS. For this number of people, the Strategy 43 target for 'natural and semi-natural green space' would be 17.3ha, and EDDC has already secured 44.2ha.
- 5.4. Progress to date has substantially been achieved through the use of Section 106 obligations. Redhayes Bridge cost £3.75m and was secured with a £5.5m grant from the Government's Community Infrastructure Fund. The grant helped to secure some of the East Exeter, Cranbrook and Feniton (ECF) Greenway.
- 5.5. The Community Infrastructure Levy (CIL) charging schedule includes provision for European site mitigation, including SANGS. The Infrastructure Delivery Plan presently has CVRP as Priority 2 but EDDC have already undertaken to raise that to Priority 1. In advance of CIL coming into force, Section 106 payments will continue to be collected to deliver all mitigation measures.
- 5.6. Officers of EDDC, Exeter City Council, Teignbridge District Council and Natural England are working towards an agreement to appoint a Delivery Officer and a board to ensure all mitigation measures are completed.
- 5.7. The delivery of new green infrastructure does not rest solely on S106/CIL and the intention is to replicate the example of Bournemouth Borough in delivering their new visitor centre at Hengitsbury, which was funded through a combination of Heritage Lottery Fund, Landfill Communities Fund and developer contributions.
- 5.8. The CVRP is a priority for biodiversity offsets and a draft strategy has been written for the Growth Point area, which forms one of the six English pilot projects launched by Defra. The Growth Point team is seeking a commitment to implement the strategy from EDDC as part of development control.
- 5.9. The increase in visitor numbers as a result of housing will not be experienced immediately, and therefore the SANG provision needs to be phased. However, EDDC will make every attempt to uphold a precautionary approach by ensuring that mitigation is in place before the occupation of new housing.

⁴ 1400 (Exe Estuary only) + 5818 (Pebblebed Heaths only) + 3781 (both i.e. overlapping zone) = 10999

6. Summary

The Clyst Valley Regional Park is essential to deliver sustainable development. There is no intention to secure access to the whole 1,900ha, but rather to join up the existing network of paths and lanes to create longer routes, and more choice, and help the new communities' to access high quality green space that already substantially exists. The Growth Point partnership has already delivered high quality green infrastructure and the Council has the strategy, governance and funding policy to deliver the remaining requirement and ensure that development coming forward is compliant with the Habitats Regulations.