



**National
Trust**

East Devon District Council
By Email: Planningpolicy@eastdevon.gov.uk

Donna.Crabtree@nationaltrust.org.uk

08 September 2022

Dear Sir/Madam,

Re: Broadclyst Neighbourhood Plan Regulation 16 Consultation

The National Trust welcomes the opportunity to comment on the Broadclyst Neighbourhood Plan, which will play an important part in helping to shape development within the Parish up to 2031. We congratulate Broadclyst Parish Council on the community-based work and in achieving this formal Regulation 16 Stage of consultation.

Our comments on the policies which are seen as having key relevance to the National Trust and Killerton Estate interests, are set out below.

POLICY CF1: COMMUNITY SPORTS HUB

The National Trust understand and are supportive of the need for this community asset.

The land identified to provide for a Community Sports Hub is owned by the National Trust. This land is held inalienably, which means that it cannot be voluntarily sold, mortgaged or compulsorily purchased against the Trust's wishes without special parliamentary procedure. This special power means that protection of such land is forever.

The land is currently occupied by Clyst Vale Community College on a long lease. The proposals for development and land use as set out in policy CFS1, would therefore require the agreement of both the lessee and the landlord, and would also be subject to legal requirements set out under the Charities Act 2011. It is not known whether any discussions have taken place between the current occupier of the site and the Broadclyst Neighbourhood Planning Steering Group.

The complex land ownership issues do present a challenge to the deliverability of this site for the specified purpose. It is noted that Policy CF1 provides a clause which would allow for

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a suitable alternative site to come forward. It would be preferable for this to be plan led, with a suitable alternative site being identified through future revisions of the Neighbourhood Plan.

POLICY EC1: REGENERATION OF BEARE FARM

The National Trust support the inclusion of this policy which relates to the National Trust's ambition to regenerate Beare Farm for economic uses, which would benefit the community.

However, it is necessary to amend the wording of the policy supporting text (at page 84) as it does not accurately reflect the current status of the site. The policy states that *Beare Farm was returned to the Killerton Estate*. However, Beare Farm is a working farm which is currently subject to an agricultural tenancy agreement. On expiry of the existing agricultural tenancy agreement, there will be the opportunity to reconsider the use of the site's farmhouse and buildings. In light of the above, this site was submitted to the Neighbourhood Plan process as an economic site. The land is held inalienably.

POLICY NE1: PROTECTING WOODLAND (AND NE3: TREE REPLACEMENT)

The National Trust looks after 26,000ha of woodland and a further 50,000ha of other wooded habitat making it one of the largest private owners of woodland in the UK. 1500 ancient & veteran trees exist on the Killerton Estate, a nationally significant heritage asset providing important habitat to a range of species. The National Trust would support the inclusion of this information when referencing National Trust woodland in the Neighbourhood Plan.

All of the woodland listed in Policy NE1 (Ashclyst Forest, Whitedown and Poundpit, Paradise Copse, Rattlecot Wood, Burrowton Copse, and Danes Wood) is owned and held inalienably by the National Trust.

Our management of woodland sits within our wider Land, Outdoors and Nature programme which aims to deliver our strategic objective of restoring a healthier and more beautiful natural environment. The National Trust is committed to managing our woodland estate in conformance with the requirements of the UK Forestry Standard and UK Woodland Assurance Standard (UKWAS), and we intend to protect and maintain the woodlands and their ecological integrity in the long term. This is reflected by our internal National Trust Woodland Management Policy (which applies to all National Trust woodland) and Woodland Management Plans (which relate to specific areas of woodland, including identified areas of woodland within the Killerton Estate).

Objectives for managing National Trust woodland include, increasing the value of woods for nature, increasing carbon sequestration and storage, and measures to slow the flow of water across our land to maintain or improve water quality and protect soils.

The woodlands listed in policy NE1 already benefit from protection by being owned inalienably by the National Trust and being subject to Management Plans which benefit environmental and social measures. Good management of National Trust woodland may

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also include the removal, thinning or containment of species which are detrimental to ecological and cultural interests, and it may not always be appropriate to replace such trees as required in Policy NE1 (and NE3) of the Neighbourhood Plan, which states where one or more trees would be removed, it shall be replaced with up to three new trees.

As set out at page 64 of the Neighbourhood Plan, the National Trust has a pledge to plant 20 million new trees by 2030. Our ambition to establish 20 million new trees by 2030 forms an integral part of our strategic aims and will contribute to both our Land & Nature work and our aim to achieve Net Zero carbon emissions. Furthermore, National Policy (NPPF) provides protections for ancient woodlands, which are in line with National Trust objectives.

In light of the above, the National Trust therefore question the necessity for additional requirements for replacement planting to apply to National Trust woodland.

POLICY NE6: LOCAL GREEN SPACES

The National Trust owns the following sites which are identified and designated in the Neighbourhood Plan as 'Local Green Spaces': Recreation Ground, Village Green, Holly Close Triangle, and Chapel Orchard.

The National Trust is supportive of these sites being included in the Neighbourhood Plan and designated as 'Local Green Spaces' for the benefit of the local community.

CIL PROJECT 4

It is noted that CIL Project 4 comprises the provision of infrastructure to enable Elbury Lane (between the Elbury Farm site and Heath crossroads) to be downgraded as a 'quiet lane' for pedestrian and cycle and access use only. The National Trust support the project aims to prioritise pedestrians, bikes, and vehicular traffic on an access only basis to Elbury Farm, with no through traffic.

GENERAL COMMENTS

The National Trust submitted two sites which were withdrawn from the current Reg 16 submission, EM1 and EM2 (Silverton Mill and Elbury Farm mixed use sites). It is noted that the Broadclyst Neighbourhood Plan states that these two sites *were withdrawn from the final Reg 16 submission document and are to be included in a future revised Broadclyst Neighbourhood Plan. A revised NP will be produced to compliment the emerging new East Devon Local Plan.*

The National Trust support the commitment for these two sites to be included in the revised Neighbourhood Plan, and as a key stakeholder, the National Trust welcomes further engagement on future revisions of the Neighbourhood Plan.

Pages 14-16 of the Neighbourhood Plan comprises a short section which sets out the relationship between the National Trust owned Killerton Estate and the Broadclyst Parish. It

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would also be worth noting that outside of significant areas of ownership, the National Trust have retained restrictive covenants over large areas of the Parish.

Page 19 of the Neighbourhood Plan lists the number of heritage assets which can be identified in the Plan Area. It is suggested that this list is checked with Historic England database of heritage assets within the Plan Area to ensure this is an up to date and complete record of the number of listed buildings and scheduled monuments.

Consideration may be given to updating the 'Landscape Character' section set out on page 21 with details of the Clyst Valley Regional Park Local Landscape Character Assessment.

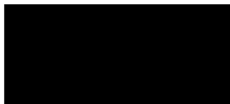
The Economy and Employment section states that historically the Killerton Estate and the Silverton Paper Mill were major employers (page 77). Whilst the Silverton Paper Mill is no longer in operation, the Killerton Estate remains a significant employer; there is a brief reference to this at page 79, though it may be useful to expand of the types of employment generated by the Killerton Estate in a separate paragraph.

Introduction to Policies ET1 and ET2 (page 100) sets out some statistical information relating to the Killerton Estate. The National Trust are able to offer updated information as follows: The most up to date ALVA figures are from 2019, and Killerton House & Garden received 281,910 visitors ranking 122nd nationally. These figures do include visitors to Marker's Cottage & Budlake Old Post Office. It is understood a similar number of visits are made beyond Killerton House & Garden to the wider estate, including Ellerhayes, Danes Wood, Paradise Copse and Ashclyst Forest. The National Trust currently operates seven self-catering holiday cottages on the Killerton Estate.

Killerton House is a significant asset within the Parish of Broadclyst, and has been subject to a setting study 'Killerton Park Setting Study (Land Use Consultants; final report, April 2013)'. This setting study is referenced in Section 6 (Natural Environment), page 52, of the Neighbourhood Plan (though it is not included within the appendices therefore this should be updated).

We hope that these comments are useful to you. Should you wish to discuss any of the matters raised, please do not hesitate to get in touch.

Yours sincerely



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