



**National
Trust**

26 January 2026

East Devon District Council
LocalPlan@eastdevon.gov.uk

Dear Sir/Madam,

Re: East Devon Local Plan 2020 to 2040 (Second Regulation 19 Local Plan Consultation)

I write in response to the Second Regulation 19 consultation of The East Devon District Council emerging Local Plan, on behalf of the National Trust (further to the National Trust's consultation response to the Reg 18 consultations in 2023 and 2024, and the first Regulation 19 consultation in 2025).

It is noted that this Second Regulation 19 consultation adds limited new information to the emerging plan and our comments below relate to those changes.

Our previous comments relating earlier Local Plan consultations remain applicable and we wish for these to be considered by the Inspector conducting Local Plan Examination.

The National Trust has the following comments relating to **Strategic Policy WS01: Development of Marcombe new community east of Exeter** which it hopes are useful in shaping this policy.

This policy sets out the policy criteria for the Marcombe new community. This new town will deliver up to 10,000 homes and will be located between the A30 and A3052. At the closest point, the proposed new town will be just 2km from the southern extent of the Killerton Estate.

In the National Trust response to the previous Local Plan consultations has set out the importance of the National Trust Killerton Estate as a significant green resource close to the city of Exeter, and the most popular National Trust house and garden in Devon.

We have previously highlighted the direct and cumulative impacts significant population increases from Cranbrook, the planned new community at Marcombe, and other proposed housing allocations within the district has, and will continue to have, on visitor numbers to the Killerton Estate.

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The Emerging Local Plan identifies the Western part of the district as a “focal point for growth” and describes the development as coming forward in an “outstanding environment with the expanded and expansive Clyst Valley Regional Park (CVRP) wrapping around new developments”, and including “comprehensive links to nearby employment, surrounding countryside, Cranbrook and the city of Exeter”. The new town is proposed to have strong integration with the surrounding natural environment, including connections to the CVRP.

The National Trust supports the policy aims for Marlcombe to include comprehensive links to surrounding countryside as set out, including connections to the CVRP.

The National Trust is a significant landowner within the expanded CVRP boundaries; the visitor offer at the Killerton Estate is therefore vital to deliver on policy aspirations and provide safe access to greenspace for the communities of both Cranbrook and Marlcombe, beyond Masterplan boundaries. The proposed town of Marlcombe has potential for significant links to the Killerton Estate via CVRP connections and Cranbrook, delivering key benefits for the community.

Joining up active travel routes from these new communities through the land at Killerton Estate which falls within CVRP and beyond, are required to realise maximum potential for sustainable travel routes. The Marlcombe Masterplan (p60) annotates a number of ‘active travel routes’ connecting Marlcombe to the south and west towards Exeter city. An ‘Active travel route’ is also shown northwards towards Cranbrook.

As raised in our previous responses to the emerging Local Plan, connections between Killerton and Cranbrook are currently constrained by railway infrastructure. Whilst the new station at Cranbrook provides excellent connectivity East to West, it presents a barrier to sustainable travel North to South. Unless travelling by car people currently do not have a safe option to either walk or cycle to the Killerton estate from Cranbrook. The National Trust has previously stated that a pedestrian / cycle railway crossing near the new Cranbrook Station would be key to connecting Cranbrook, and now Marlcombe, with the Killerton Estate and the wider Regional Park.

The National Trust is currently undertaking a Feasibility Study relating to a construction of a bridge and multi-use trail to provide safe crossing of Cranbrook Railway line (with funding provided by South West Rail and their Customer and Communities Improvement Fund). Our long-term plan is to provide a safe access route for local people to Killerton and the surrounding area. The National Trust is keen to work in partnership with East Devon to ensure that opportunities for active travel links from Marlcombe to the Killerton Estate via Cranbrook and the CVRP are maximised to the greatest benefit to the public.

In addition to the Killerton Estate, the Trust has identified opportunities in **Exmouth** to address inequalities in access to nature. The scale of Marlcombe’s future population will add to demand for high-quality, accessible greenspace across the district, and the National Trust is working with partners to better serve these communities. We would be pleased to share further details as these proposals evolve.

The Marlcombe new community has been shortlisted by the UK government New Towns Taskforce as one of 12 locations to be included in the New Towns programme. East Devon District Council communications have stated that “Being included in the Taskforce’s recommendations means Marlcombe will benefit from additional funding, expertise and national recognition, supporting East Devon District Council in creating a model new town for the 21st century in collaboration with our partners”. The proximity of the National Trust Killerton Estate to Marlcombe is closest of any of the other 11 shortlisted sites to National Trust landownership and presents a unique opportunity to deliver on active travel aspirations.

It is noted that the first 8000 homes of Marlcombe are shown on the EDDC Policies Plan, with around 3300 new homes proposed on allocated land within the plan period (up to 2042). The foreword to the emerging Local Plan states “by consolidating a substantial portion of East Devon’s housing needs in this new community, we can deliver the infrastructure and affordable housing that our area urgently requires.”

The National Trust notes that the government has previously suggested that the contribution new towns make to housing demand should be over and above local housing need, but also notes that a decision will be made on this in due course with the government currently giving careful consideration to how new town numbers and local housing need numbers interact.

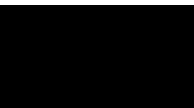
The National Trust would welcome clarification that, in the event that the government decide that the contribution new towns make to housing demand must be over and above local housing need, that the emerging East Devon Local Plan would be able to demonstrate a five year housing supply, and would not leave EDDC immediately vulnerable to speculative development.

Summary

In summary, the National Trust is supportive of policy aims for Marlcombe to include comprehensive links to surrounding countryside as set out, including connections to the CVRP. The National Trust is a significant landowner within the expanded CVRP boundaries, and therefore the visitor offer at the Killerton Estate is vital to deliver on policy aspirations and provide safe access to greenspace for the communities of both Cranbrook and Marlcombe, beyond Masterplan boundaries. The National Trust is keen to work in partnership with East Devon to ensure that opportunities for active travel links from Marlcombe to the Killerton Estate via Cranbrook and the CVRP are maximised to the greatest benefit to the public.

We hope that the above comments help to shape the East Devon District Council emerging Local Plan. It remains that the National Trust wish to be included as consultee of further stages, and as a key stakeholder in future discussions regarding the CVRP.

Yours sincerely



Donna Crabtree, Planning Adviser (BA Hons, MSc, MRTPI)