



National
Trust

15th January 2022

Dear Sir/Madam,

Re: East Devon Local Plan 2020 to 2040 (Preferred Options Reg.18 consultation).

I write in response to the current Reg 18 consultation of The East Devon District Council emerging Local Plan. Specifically, I write in relation to the key issues and policies which are applicable to the National Trust ownership across the District, including the Killerton and A la Ronde National Trust Estates, as well as land adjacent to settlements, and in the open countryside.

Strategic Policy 16. Green Infrastructure and the Clyst Valley Regional Park

The National Trust Killerton Estate is a significant green resource close to the city of Exeter, and the most popular National Trust house and garden in Devon. The 2600-hectare estate centres around Killerton Park, included at Grade II* on the Register of Parks and Gardens of Special Historic Interest in England, providing the setting for the Grade II* listed Killerton House.

The Killerton Estate is already an important recreational, heritage, landscape asset, and visitor destination for surrounding populations. There are 52 kilometres of permissive rights of way on the estate, including 27 kilometres of permissive bridleway. The impacts of housing growth and increase in the population in the areas surrounding the Estate, are already being felt through greater footfall. It is estimated that visitor numbers could rise to over half a million visitors per annum in the next 10 years.

It is noted that a new town to the east of Exeter and adjacent to the Clyst Valley Regional Park boundary (**Strategic Policy 8. Development of a second new town east of Exeter**) is proposed which will develop up to 2500 homes within the plan period (up to 2040), and a further 5500 beyond the plan period. This represents a significant population increase in addition to the Cranbrook urban extension and other proposed allocations in the district, which has a direct and cumulative impact on visitor numbers to the Killerton Estate, and the need for access to quality green infrastructure. Therefore, delivery of the Clyst Valley Regional Park is vital to provide access to greenspace for this increasing population.

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The Killerton Estate is a significant landowner within the Clyst Valley Regional Park, covering 42% of its area. As such, the Killerton Estate, and the wider valley park, represents valuable green infrastructure for local urban and semi-urban communities, including those in Exeter and East Devon, by providing for connections with outdoors and nature and wellbeing, integrated with the rich historic environment.

The National Trust is supportive of the objectives as set out within this policy which are broadly consistent with the National Trusts 2020-2025 strategic aims including nature recovery programmes at our places: restoring habitats to help in the fight against climate change, and to help people connect with the nature. As well as addressing unequal access to parks and green spaces in, around and near urban areas, through the creation of green corridors; large areas of nature rich land, connected to urban areas by safe and beautiful routes.

The National Trust are progressing several projects which directly relate to the objectives of Strategic Policy 16. Last year, the National Trust produced an estate-wide Spatial and Audience Development plan, which informs the development of a 50-year vision for the Estates landscape, seeking to become carbon net zero, focussed on working with nature and for people, operating sustainably adopting new and innovative ways of using land and buildings to provide inspiration and enjoyment for everyone. As part of this vision, the Killerton Three Rivers Landscape Recovery project has been successful in securing government funding ([Projects of Landscape Recovery scheme announced - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/projects-of-landscape-recovery-scheme-announced)).

The National Trust intends to test new engagement approaches and improve access for all to the outdoors, connecting communities and allowing them to appreciate nature and broader restored landscape. This will showcase how a lowland estate can be part of the solution to climate, nature and health challenges. The ambition is that Killerton will be a landscape that will be a flagship for nature, climate action and people, a destination for recreation, nature connection and wellbeing.

Through creating a range of connected destinations and activities across the Estate, the National Trust looks to welcome a wide range of visitors from new and existing communities, including those resident in Exeter and East Devon, and find diverse ways for everyone to feel part of this place. This ambition of the National Trust is compatible with objective a) of the policy. It would be useful if this policy objective was clearer in its aim to support the Regional Park with complementary commercial recreational activities to provide both recreational and economic benefits, where appropriate to the character of the area and providing any individual impact is compatible with the Regional Park objectives. It is also recommended that this policy objective refers to the health and wellbeing of visitors as well as residents, in recognition of the contribution that this strategic green infrastructure will make to tourism and the rural economy.

Objective e) concerns the promotion of *cycling and walking opportunities to link habitats and sustainable movement networks that promote the overall recreational experience* within the Clyst Valley Regional Park, and there is a target to create 80 km of traffic-free trail and quiet way meeting LTN 1/20 design standards.

The National Trust is keen to work with partners to provide improved sustainable travel links within the Killerton Estate, and connecting with new and existing communities, including those in Exeter and East Devon. Developing ideas in partnership with East Devon District Council,

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Devon County Council and Exeter City Council to develop quiet-lane, traffic-free networks and multi-use trails would ensure the greatest benefit to the public.

The National Trust has previously highlighted the importance of links from Cranbrook to the Killerton Estate, and Clyst Valley Regional Park. In response to the Cranbrook DPD, the National Trust requested that consideration was given to accessibility in relation to movement routes north of the rail line, and confirmed it would like to see better connectivity to the north, principally with regards to recreational routes, given the opportunity the Killerton Estate affords to current and future residents. Given the importance of the Clyst Valley Regional Park in providing Green Infrastructure for residents of East Devon, the National Trust consider the potential for a pedestrian / cycle railway crossing near the new Cranbrook Station would be key to connecting Cranbrook with the Killerton Estate and the wider Regional Park. Therefore, the National Trust would welcome further consideration of the potential for a pedestrian / cycle railway crossing near the new Cranbrook Station.

The policy states that major proposals should make commensurate contributions to specified targets. This could be strengthened to state that major proposals 'must' make commensurate contributions. The policy also states the delivery of the Clyst Valley Regional Park will draw more widely on developer contributions, CIL, and agricultural-environmental funding streams. It would be beneficial if further detail could be provided through the Local Plan to quantify the cost and sources of funding, to provide clarity over delivery mechanisms, delivery timescales and the level of contributions to be required from developers.

It is noted that the supportive text states that *delivery of the full suite of Regional Park objectives relies on partnerships across public, private and charitable sectors*. As a significant landowner and key stakeholder of the Clyst Valley Regional Park, the National Trust wishes to be involved in future discussions (including regarding the intent *to define a boundary for an extension to the Park and associated sustainable transport network, including the Clyst Valley Trail*, as set out in this policy).

Strategic Policy 20. Exmouth and its future development.

The National Trust owns important heritage assets and environmentally sensitive coastal land in and adjacent to Exmouth.

A la Ronde, which is considered to be of exceptional interest, is a nationally important cultural asset sited approximately 3 kilometres from the centre of Exmouth. A la Ronde comprises a group of Heritage Assets including several Grade I listed buildings set within a Grade II listed Registered Park and Garden.

The National Trust are pleased to see that site allocation LP_Lymp_12, opposite of Summer Lane, has been rejected as a possible site for housing development. This site would be in key, close-at-hand designed views from A la Ronde and its Registered Park and Garden, and this agricultural land contributes highly to the landscape setting. Due to the impact on setting of important heritage assets owned by the National Trust, it is agreed that this site would be inappropriate for housing development. As this site is a 'rejected' site, the National Trust do not consider it is necessary to expand any further.

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The National Trust notes that proposed site allocations Lymp_07 and Exmo_23, which lie between National Trust ownership at A la Ronde and at Lower Halsdon Farm, are indicated on the policies maps as 'second choice' sites.

The current East Devon Local Plan identifies both sites as falling within the Coastal Preservation Area between Exmouth and Lympstone, with Lymp_07 also falling within the identified Green Wedge of the currently adopted Local Plan. **Strategy 8. Development in Green Wedges** of the current Local Plan applies to development in such areas and does not permit development if it would damage the individual identity of a settlement.

National Trust is the owner of land at Lower Halsdon Farm (since 1996 when Lower Halsdon Farm and the surrounding land was generously bequeathed to the National Trust by farmer Stanley Long). The land owned by the National Trust includes land south from properties on Courtlands Lane and west from Exeter Road (directly south of the proposed 'second choice' allocations) down to Mean High Water on the Exe foreshore. This area is important in landscape terms on the estuary fringe and forms a significant part of the designated 'Coastal Preservation Area' on the eastern side of the Estuary between Lympstone and Exmouth. The National Trust therefore has an interest in protecting the character of the estuary fringe.

The National Trust's objection in relation to housing development at the 'second choice' allocations site Lymp_07 (and part thereof) has been made on several occasions as formal representations to the following planning applications:

- 10/0694/MOUT (mixed use development comprising residential development of 154 dwellings, 50 bed care home, business units, doctors/dentist, shop/cafe, creche/nursery, community hall together with associated open space and infrastructure);
- 11/1293/MOUT (mixed use development comprising residential development of 154 dwellings, business units, doctors surgery, shop/cafe, creche/nursery, community facilities together with associated open space and infrastructure);
- 13/2025/MOUT (construction of 33 dwellings and associated open space, balancing pond, footpaths and structural planting)*

*The 2010 application was refused by the Local Planning Authority, the following 2011 application considered and refused by the Planning Inspectorate (following non-determination by the LPA), and the 2013 application (understood to be the latest application for development at the site) was refused by the Local Planning Authority (a subsequent appeal was withdrawn).

The planning history and appeal documents available, highlight the sensitivity of the site in landscape terms and its importance in maintaining separation of Exmouth and Lympstone. The Inspector considering the 2011 Planning Appeal (at para 33 of the Appeal Report) considered that *'The proposal would seriously harm the character and appearance of the area, including the setting and identity of the village of Lympstone. This harm and the conflict with the 'saved' development policies that I have found lead me to conclude that in landscape/settlement terms this site is unsuitable for housing'*

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The National Trust have previously considered the extent of visibility of this site along the estuary and intervisibility with the coast. The potential long-distance views would be extensive, including views from the East Devon way (which is popular with visitors and locals) which crosses the site. The 'second choice' allocations sites lie in a prominent position, on environmentally sensitive land between the two towns (Exmouth and Lympstone), and the National Trust is in agreement with the Inspectors finding that housing development in this location *would seriously erode the unspoilt open qualities of the site and would markedly erode the integrity of the Green Wedge that separates Exmouth from Lympstone* resulting in significant and unacceptable landscape and visual harm to the estuary fringe.

It is noted that the Green Wedge locations and boundaries are currently under review (para 12.10 of the emerging Local Plan) as is the extent of the Coastal Preservation Area boundary (para 12.6 of the emerging Local Plan). The policies map shows the currently adopted Green Wedge boundaries, excluding any sites now proposed for allocation, including Lymp_07. The National Trust wishes to be recorded as objecting to the proposed allocation of this site for housing, and any removal/reduction of the Green Wedge or Coastal Preservation Area designation from this site and the surrounding area, from its current extent.

As Exmouth, Exeter and East Devon develop and increasing populations seek connection to the countryside, A la Ronde, complemented by an outdoor offer at the adjacent National Trust property of Lower Halsdon, provides a 'green lung' for local communities. The National Trust have invested in facilities at Lower Halsdon Farm, which have the opportunity to connect use of the farm land with the Exmouth/Exeter estuary walking/cycle trail and a hub at A la Ronde for the benefit of existing and new communities, providing connection to nature, and to cultural history that both help to foster a sense of shared identity. Housing development at the proposed 'second choice' allocations would be at odds with the contribution that the National Trust land and surrounding area makes to the unspoilt open qualities of the landscape in this location, which should be highly valued.

Therefore, for the reasons set out above, the National Trust object to the allocations as 'second choice' sites, and requests that these are omitted from future consultation stages of the emerging East Devon District Council Local Plan.

Strategic Policy 25. Development at Local Centres.

This policy identifies land to the east of Town End as a preferred allocation for 24 new homes and 0.1 hectares of employment land (allocation reference Brcl_29). This site is owned by the National Trust as investment land that was donated specifically to fund conservation work on the Killerton Estate.

It has always been The National Trust's intention to sell this investment land when an appropriate opportunity arose. Funds raised from the sale of this land would be used to help unlock our plans for the Killerton Estate, bringing significant long-term benefits for nature conservation and the local community.

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It is noted that a further larger site to the west of Whimble Road (allocation reference Brcl_12) has been identified as a preferred allocation for 136 new homes and 0.54 hectares of employment land. The south-west boundary of this site allocation is contiguous with the north-eastern boundary of the preferred allocation on National Trust land to the east of Town End.

The National Trust does not object to the principle of housing to the north-east. However, the National Trust would support specific policy requirements, applicable to both sites, to secure high quality development which; respects the local identity of Broadclyst; protects the setting of listed buildings; sites development in the least environmentally sensitive parts of the site; ensures that sustainable pedestrian and cycle links are provided (including between the sites, with the existing settlement, and wider sustainable links to green infrastructure such as the Clyst Valley Regional Park); and to ensure appropriate green infrastructure and gains for nature.

Given the proximity of the two allocations Brcl_12 and Brcl_29, consideration should be given to a policy requirement for a holistic masterplan which incorporates both sites, to ensure the design and layout of this area is comprehensively planned.

It is understood that Broadclyst school is oversubscribed therefore, in due course, the National Trust would welcome a better understanding of how the Local Planning Authority intend to address any issues with existing infrastructure/services within Broadclyst, should the quantum of housing be brought forward as currently proposed.

It is also recommended that the number of homes planned should be expressed as an 'up to' figure, to set a maximum limit on housing density.

The Policies Map for Broadclyst does not clearly define the separate extent of each of the above allocations. The National Trust requests that the policies maps are updated for the purposes of future consultations to clearly show that the sites are in separate ownership. The National Trust also requests that the National Trust oak leaf branding is removed where it is shown within the extent of preferred application Brcl_12 to avoid confusion regarding the extent of the National Trusts land ownership.

It is noted that the settlement boundary for Broadclyst has, in places, been drawn wider than the boundaries of the preferred site allocations and extent of existing development (including land to the south of preferred allocations Brcl_12 and Brcl_29, and land to the west of the settlement which extends into the Clyst Valley Regional Park boundary). It is recommended that this is reviewed, and amendments made to ensure that the defined settlement boundary sits tightly around existing development and preferred site allocations.

Strategic Policy 30. Suitable Areas for solar energy developments

The National Trust is supportive of the inclusion of a policy/policies to promote renewable energy development. The National Trust is supportive of renewable energy as a matter of principle and considers that appropriate development can play an important role.

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However, the National Trust is concerned with the extent of the District which has been identified as 'Areas considered suitable for solar energy' as set out on the policies maps. We note that whilst the evidence base for mapping of these areas has taken account of (inter alia) Areas of Outstanding Natural Beauty and the extent of Registered Parks and Gardens and Scheduled Monuments, it does not take account of listed buildings or their settings. We understand that mapping each individual listed building and attempting to map its setting may be impractical at the Local Plan preparation stage. However, we believe that the approach to mapping taken warrants changes to the policy wording as currently proposed.

As set out above, the National Trust owns A la Ronde (Grade I Listed Building set within a Grade II listed Registered Park and Garden) and Killerton House (Grade II* Listed Building set within Grade II* listed Registered Park and Garden) which lie within East Devon District Council. The National Trust has previously commissioned settings studies for these heritage assets and can provide copies of these to East Devon District Council.

The supporting text to Strategic Policy 30. States that the 'intention of this policy will be to create an environment which gives certainty to the industry as to where schemes will be acceptable.' Given the broad approach to mapping of 'suitable' areas, the National Trust question whether this aim is met.

It is the opinion of the National Trust that, in particular, the use of a 'presumption in favour unless...' for supporting solar energy within the mapped areas should be reconsidered. Should the mapped areas remain as currently set out, the policy must make clearer that the mapped areas indicate 'potentially' suitable areas for solar energy development (and this should be reflected in the wording of the policy title and the key to mapped areas on the policies maps), which will be subject to further survey work and assessment.

It is acknowledged that the policy sets out planning constraints where unacceptable impacts would result in solar energy not being supported, however, together with the changes to emphasis of the policy set out above, the policy should be made clearer as to when solar energy will not be supported, and what further survey work and assessment will be required.

With regards to the historic environment, it should be made clear that proposals must include an assessment of the impact on the setting of known heritage assets, with consideration to options for firstly avoiding harm and then reducing any unavoidable harm, and where possible providing enhancement, to ensure an acceptable balance between harm and benefit.

The Policy states that solar energy proposals must not lead to direct conflict with any Local Plan policy that specifically affords safeguarding protection to land (unless the development can be accommodated within the policy terms of the safeguarding). To ensure that the policy is effective, it is suggested that the relevant safeguarding policies are cross referenced to ensure clarity on all those which are relevant.

Whilst the areas of mapping relating to 'suitable areas for wind energy developments' does not include the scale of extensive mapping that has been applied to solar energy developments, the wording of **Strategic Policy 31. Suitable areas for wind energy developments** should be consistent with Strategic Policy 30, and therefore the National Trust's comments should be taken to apply to this Strategic Policy 31 also.

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Strategic Policy 35. Flooding.

The National Trust is supportive of the aims of this policy, however, considers that the policy wording should be strengthened from wording for policy requirements such as 'preferably' and 'ensure' to 'development must...' or other similarly robust wording.

Strategic Policy 36. Coastal Change Management Areas.

The National Trust is supportive of this policy which is generally consistent with our own coastal policies/strategy. The opening statement for the policy clearly sets out the aims. In relation to the second bullet point, the policy wording could be strengthened further to set out that developers 'must demonstrate that they require a coastal location' or 'providing they absolutely require a coastal location.'

The policy states that *Planning permission for all development in a CCMA will be time limited according to the risk identified in the coastal erosion vulnerability assessment.* The policy would benefit from explanation of how that time limitation is calculated.

Strategic Policy 65. Walking, cycling, and public transport.

The National Trust supports the prioritisation of sustainable walking and cycling links, and links to high quality public transport through location, layout, and contributions.

National guidance states that Local Planning Authorities should consider incorporating Local Cycling and Walking Infrastructure Plans (LCWIPs) into Supplementary Planning Documents (SPDs), which would enable East Devon District Council to secure appropriate contributions to cycling and walking infrastructure (through inclusion in Regulation 123 lists or developer contributions). Therefore, the National Trust recommend that consideration is given to including the emerging LCWIP, which is being produced by Devon County Council, as an SPD.

Strategic Policy 66. Protecting transport sites and routes.

The National Trust supports the protection of sites and routes that promote sustainable travel, including the Clyst Valley Trail.

The Exeter Plan has also recently been consulted on. Policy ST3: Active Travel Proposals (1.a.) of the Exeter Plan relates to the Clyst Valley Trail, which connects the Killerton Estate with the Exe Estuary, and seeks to safeguard the Exeter sections and future links to this long-distance strategic trail (along with other long distance strategic trails).

It would be beneficial if further details could be set out with regards to the Partnership working required to ensure that these strategic trails are connected to the wider active travel network, where these cross Local Planning Authority boundaries.

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Policy 103. Listed buildings

The supporting text to this policy states that Heritage Statements, Statements of Significance, and Impact Assessments should be produced in line with current best practice and relevant national guidance. It is recommended that the guidance states that such assessments should follow a systematic approach in line with Historic England guidance: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3, 2nd Edition (2017)*, and *Statements of Heritage Significance: Historic England Advice Note 12 (2019)*, or as per any updates to these documents.

We hope that the above comments help to shape the East Devon District Council emerging Local Plan. The National Trust confirm that we would like to be included as consultee of further consultation stages of The East Devon Local Plan, and as a key stakeholder in future discussions regarding the Clyst Valley Regional Park.

Yours sincerely



Donna Crabtree (BA Hons, MSc, MRTPI)

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