



**National
Trust**

March 2025

East Devon District Council
LocalPlan@eastdevon.gov.uk

Dear Sir/Madam,

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

I write in response to the current Reg 19 consultation of The East Devon District Council emerging Local Plan, on behalf of the National Trust. Specifically, I write in relation to the key issues and policies which are applicable to the National Trust ownership across the District, further to the National Trust's consultation response to the Reg 18 consultations in 2023 and 2024.

Strategic Policy WS09: Clyst Valley Regional Park

In the National Trust response to the Reg 18 consultation we 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 highlighted the direct and cumulative impacts significant population increases from Cranbrook, the planned new community east of Exeter as set out in Policy WS01 of the emerging Local Plan, and other proposed housing allocations within the district, has on visitor numbers to the Killerton Estate.

The National Trust is already a significant landowner within Clyst Valley Regional Park (CVRP) boundaries; the visitor offer at the Killerton Estate is therefore vital to provide greenspace for this increasing population.

The National Trust is supportive of the objectives as set out within this policy which seeks to ensure that development proposals within and adjacent to the CVRP will support the objectives in the CVRP Masterplan (wording in the policy needs to be updated from 'Management Plan' to 'Masterplan' to reflect the document title). The National Trust notes that the policy seeks to ensure that major development within or on land adjacent to the CVRP will contribute to criteria A-E and make proportionate contributions to targets 1-4.

The CVRP Masterplan itself was approved in 2021, and will need to be reviewed within the emerging Local Plan period 2020-2042. Given that Strategic Policy WS09 supports

National Trust
South West Region

Patron: His Majesty The King
Chair: René Olivieri CBE
Regional Director: Rebecca Burton

development proposals within and adjacent to the CVRP providing the objectives of the CVRP Masterplan are met, it is suggested that further details are stated in the supporting text which sets out the process and timescales for review of the Masterplan.

The supporting text (para 4.40) states that a large portion of the park is within the National Trust's Killerton Estate. Given the role of the National Trust as a significant landowner, we request that consideration is given to the importance of the Killerton Estate and how it's role in delivering the CRVP objectives can be reflected in the supporting text.

The National Trust would welcome discussions with East Devon District Council regarding further extensions to the CVRP boundaries to incorporate additional areas of the 2600-hectare Killerton Estate prior to adoption of the emerging Local Plan.

Criteria B) of policy 16 concerns connected cycling and walking infrastructure, including the Clyst Valley Trail, and F.4. states that proportionate targets should be made towards 80km of traffic-free trail and quiet way.

The National Trust support this policy criteria but are also keen to support connections between Killerton and Cranbrook which are currently constrained by railway infrastructure. This policy provides an opportunity to reference ambitions to provide these connections given the CVRPs role in ensuring Cranbrook and other developments are provided with large scale, high quality greenspace.

As stated in our previous responses to the emerging Local Plan, 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 National Trust remains 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, Devon County Council and Exeter City Council to develop quiet-lane, traffic-free networks and multi-use trails, and addressing constraints to providing connections, would ensure the greatest benefit to the public.

Criteria 4 of this policy refers to cycling and walking opportunities meeting design standards. It would be useful here to cross reference the Countywide Local Cycling and Walking Infrastructure Plan.

Para 4.43 of the supporting text states that *delivering park objectives relies on partnerships across public, private, and charitable sectors, with funding from diverse sources, including Community Infrastructure Levy and Section 106 obligations*. As a significant landowner and key stakeholder of the Clyst Valley Regional Park, the National Trust is keen to be involved in future discussions, including overcoming connections constrained by rail infrastructure

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and further extension of the Clyst Valley Regional Park boundary to include a wider area of the Killerton Estate.

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.

Strategic Policy SD01: Exmouth and its development allocations

As set out in the National Trust's response to previous consultations, the National Trust owns important heritage assets and environmentally sensitive coastal land in and adjacent to Exmouth.

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 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 notes that proposed site allocations Lymp_07 (Land at Courtlands Cross) and Exmo_23 (Land to the South of Courtlands Lane), which lie between National Trust ownership at A la Ronde and at Lower Halsdon Farm, and were indicated at Reg 18 consultation on the policies maps as 'second choice' sites, are now proposed allocations in the Reg 19 Local Plan Consultation.

The National Trust's objection in relation to housing development at the proposed allocation site Lymp_07 (and part thereof) has been made on several occasions as formal representations to historic planning applications at this site, and then at Reg 18 stage of the Local Plan when this site was a 'second choice' allocation.

The National Trust wishes to confirm that it maintains its objection to this allocation, which is proposed to accommodate around 100 new homes and 0.4 hectares of employment land. Our response was previously set out in full as part of the Reg 18 consultation.

The National Trust agrees with previous assessments made by East Devon District Council and the Planning Inspectorate when considering previous planning applications/appeals, that the site is unsuitable for housing due to the resulting significant landscape and visual harm to the estuary fringe.

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Housing development at Lymp_07 (Land at Courtlands Cross) and Exmo_23 (Land to the South of Courtlands Lane) 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, and therefore the National Trust maintains its objection and requests that these are omitted from the final version of the Local Plan submitted for examination. Our previous response is attached again for the attention of East Devon District Council.

As part of the National Trust objection to proposed allocation site Lymp_07, we confirmed that we would object to any removal/reduction of the Green Wedge and/or Coastal Preservation Area designation from this site or from site Exmo_23, or the surrounding area, from its current extent. And we maintain this objection also. This is set out in further detail under Policy OL05: Green Wedges and Strategic Policy OL03: Coastal Preservation Areas, below.

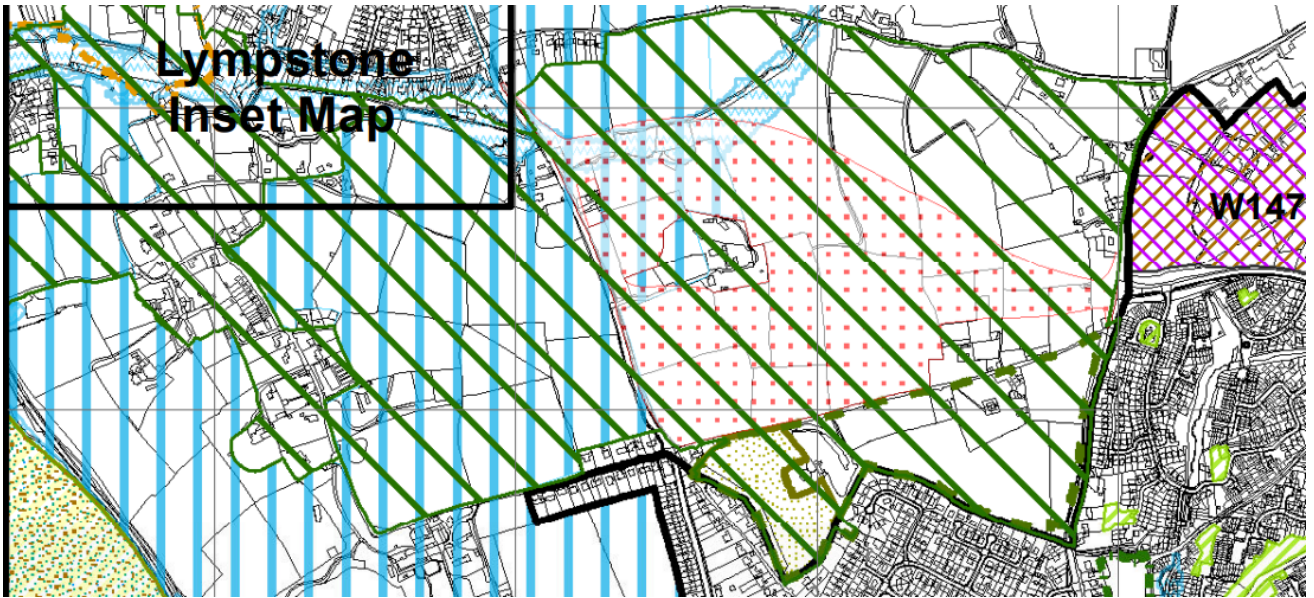
Policy OL05: Green Wedges & Strategic Policy OL03: Coastal Preservation Areas

Para 12.16 which supports this policy states that *Green wedges are a long-standing local landscape designation that maintains open green networks between settlements to prevent coalescence and preserve local identity.*

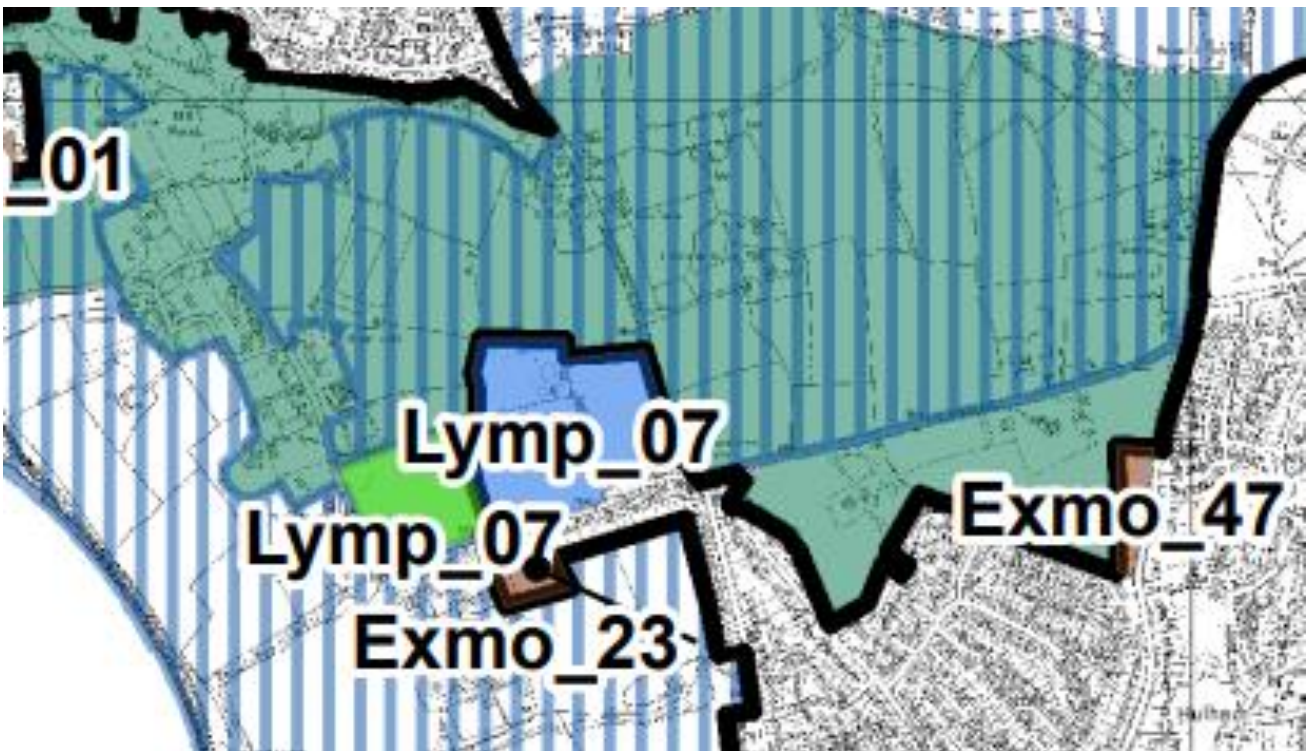
It is noted that the extent of the Green Wedge (which is supported by current Local Plan Strategy 8) as shown on the policy maps for the emerging local plan, has been reduced most notably by the extent of emerging Local Plan allocations Lymp_07 (Land at Courtlands Cross) and Exmo_23 (Land to the South of Courtlands Lane).

There is a proposal for a large extension to the Coastal Preservation Area (which is supported by current Local Plan Strategy 44) in this locality to the east of its current boundary, which the National Trust supports. However, it is noted that the Coastal Preservation Area would also be reduced in extent to exclude the areas of site allocations Lymp_07 and Exmo_23; to which the National Trust objects.

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Above: Current Green Wedge (green diagonal hatching) as set out in Strategy 8 of the Local Plan and as shown on Local Plan maps for current Local Plan 2013-2031. Coastal Preservation Area (vertical blue line) as set out under Strategy 44.



Above: Proposed Green Wedge (solid green layer) as set out in Policy OL05: Green Wedges of the emerging Local Plan and as shown on Local Plan maps for emerging Local Plan 2020-2042. Coastal Preservation Area (vertical blue line) as set out under Policy OL03.

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Green Wedges are designated in the Districts most sensitive areas, and a reduction of the extent in this instance, together with the introduction of housing, would lead to unacceptable landscape harm as has been documented by the Planning Inspectorate when considering previous appeals for housing at the site. The Planning Inspectorate has previously assessed housing at this site to 'seriously harm the character and appearance of the area'. The National Trust therefore maintains its objection to the reduction of the extent of the Green Wedge in this location, to protect this site from inappropriate development.

As set out above, the National Trust also maintains its objection to the proposed reduction of the Coastal Preservation Area to accommodate site allocations Lymp_07 and Exmo_23. It is noted that an East Devon District Council review of the CPA in 2023 ([Appendix 1-Coastal Preservation Areas assessments full report.pdf](#)) did not include a proposed omission in the locality of these site. The current proposal for a reduction in these areas, together with the introduction of housing would result in a harmful impact on the undeveloped character and visual openness of this part of the coast.

Strategic Policy SD07: Development allocations at Broadclyst

Land west of Whimble Road, Broadclyst (Brcl_12) combined with Land to east of Town End, Broadclyst (Brcl_29)

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

At Reg 18 stage, the National Trust commented on the proposed allocations and suggested that there should be a policy requirement for a holistic masterplan which incorporates both sites, to ensure the design and layout of this area is comprehensively planned.

The National Trust is therefore pleased to see that site allocations Land west of Whimble Road, Broadclyst (Brcl_12) and Land to east of Town End, Broadclyst (Brcl_29), have been combined under Strategic Policy SD07 (Development allocations at Broadclyst), and that a site Masterplan is a requirement of the policy.

However, the National Trust considers that further amendment to the policy should be considered to combine the housing and employment requirements of the site, to reflect the Masterplanned approach. Currently, the requirements for employment land are set out separately for each area. Area Brcl_12 is set out to accommodate approx. 0.6 hectares of employment land, and Area Brcl_29 is set out to accommodate approx. 0.1 hectares of employment land. In a Masterplanned approach, it is likely that the required employment land would be combined and delivered in one location within the wider site. Therefore, it is considered that the policy should clearly reflect this, rather than separating the requirement.

It is noted that the policy requires a pedestrian access to Green Tree Lane and/or Town End to be delivered. It is considered that this combined allocation should facilitate active transport links, including cycle connectivity, and therefore consideration should be given to

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updating the policy wording to support appropriate cycle connections through the site, to the village, and onward to wider sustainable links to green infrastructure such as the Clyst Valley Regional Park, and ensuring cycle/pedestrian priority.

Strategic Policy CC03: Promoting low carbon and renewable energy

The National Trust commented on the earlier iteration of this renewable energy policies at Reg 18 stage, suggesting that clearer wording was necessary to ensure suitable protections for National Landscapes and historic assets. The policies that the National Trust previously commented on were Strategic Policy 30. Suitable Areas for solar energy developments and Strategic Policy 31. Suitable areas for wind energy developments.

The National Trust remains 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.

The National Trust previously raised concern regarding the extent of the District which has been identified as 'Areas considered suitable for solar energy' as set out on the policies maps and the wording of the policy. Our previous comments are attached for attention.

It is noted that the solar and wind energy policies have been combined and set out further clarity regarding when proposed developments are likely to be acceptable. However, it is considered that the policy wording should be updated to apply suitable reference and protection to heritage assets within the district. As previously set out, the National Trust consider 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.

Strategic Policy TR02: Protecting transport sites and routes

The National Trust previously set out in respect of Strategic Policy 66 (at Reg 18 stage), that it would be beneficial if at 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. These comments remain applicable to the updated policy wording.

Policy HE02: Listed buildings

The National Trust commented on the earlier version of this policy at Reg 18 stage (Policy 103. Listed buildings) and is pleased to see that the policy wording has been updated to reflect a systematic approach to heritage assessment as set out by Historic England.

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Summary

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)

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