

East Devon Local Plan – Topic Paper SAL – 049

Major Development in National Landscapes

Regulation 19 version



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Front cover photograph taken looking south across Otterton with site Otto_01 in middle ground.

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1. Introduction

- 1.1 This topic paper sits behind and supports the Publication draft of the East Devon Local Plan. There may be new versions of this topic paper as plan making progresses into and through plan Examination. The purpose of the Topic Paper is to set out how ‘major’ development in the context of a National Landscape has been identified and assessed in relation to site allocations. It follows the approach set out in the topic paper that was considered by the Strategic Planning Committee in June 2024¹. The approach was devised in discussion with the East Devon and the Blackdown Hills national landscape teams.
- 1.2 The identification of major development in a national landscape in the context of the NPPF is open to interpretation by decision makers to take into account local factors. This paper sets out how the NPPF has been interpreted for the local plan in light of the particular characteristics of the national landscapes within East Devon. The method devised to assess whether individual allocations proposed as part of the local plan constitute ‘major development’ is considered to be thorough and robust. Applying a consistent approach has ensured that individual assessments can be justified rationally, while also reflecting the diversity of landscapes concerned. The assessments have considered whether development of the allocation sites have the potential to have a serious adverse impact on the natural beauty of a national landscape by reason of its scale, character or nature. This has been necessary to avoid a situation where an allocation could be undeliverable because it was incapable of meeting the NPPF tests on major development. However, it does not mean that no further assessment is necessary as part of the development management process because the precise nature of the proposed development will have an impact on planning judgements about the actual impact on a national landscape.
- 1.3 All sites within or adjacent to a national landscape have been included in the assessment. Consideration has been given to whether this should be extended to other sites that have intervisibility with a national landscape. However, all such sites are seen in the context of the related settlement and none of the proposed allocations are considered to have a material impact that would require an assessment for the purposes of the local plan.
- 1.4 Where it is concluded that an allocation would constitute major development in the context of a national landscape, the NPPF requires an assessment of whether there are ‘exceptional circumstances’ to justify the allocation. This paper includes these assessments in a standard format that has regard to both the NPPF and the spatial strategy of the emerging local plan. This framework has ensured a consistent approach that makes it clear why decisions on individual sites have been made.
- 1.5 The topic paper is structured so that it summarises the relevant national policy, sets out the East Devon context and explains the framework that has been used for individual allocations. A summary of the results of the assessments is followed by individual

¹ [Agenda for Strategic Planning Committee on Tuesday, 4th June, 2024, 10.00 am - East Devon](#)

assessments on a settlement by settlement basis in alphabetical order. Appendices include relevant extracts from Blackdown Hills Management Plan and East Devon Planning Guidance and the template assessment forms.

- 1.6 The site assessment work² and sustainability appraisal³ undertaken to inform the local plan allocations provides evidence to underpin this paper.

² [Evidence and Examination Library - Site Allocations \(SAL\) - East Devon](#)

³ [Evidence and Examination Library - Core Submission Documents \(CSD\) - East Devon](#)

2 Summary of National Policy

- 2.1 All references to the NPPF are to the December 2023 version⁴, under which the local plan will be examined. Paragraph 182 of the 2023 NPPF states that “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”.
- 2.2 Paragraph 183 states that “When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”
- 2.3 A footnote in the NPPF to these paragraphs’ states that “For the purposes of paragraphs 182 and 183, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”
- 2.4 It should also be noted that the legislative requirements for local planning authorities in relation to national landscapes were changed by alterations to the Countryside and Rights of Way (CROW) Act (2000) that were made by the Levelling Up and Regeneration Act 2023. Previously all ‘relevant authorities’ had to ‘have regard’ to the specified purposes (of the national landscape), but now they must ‘seek to further the purposes’ (of the national landscape). The ‘purposes’ referred to in relation to a national landscape are ‘conserving and enhancing natural beauty’. National guidance⁵ on this duty was published in December 2024.

⁴ [\[ARCHIVED CONTENT\] National Planning Policy Framework - GOV.UK](#)

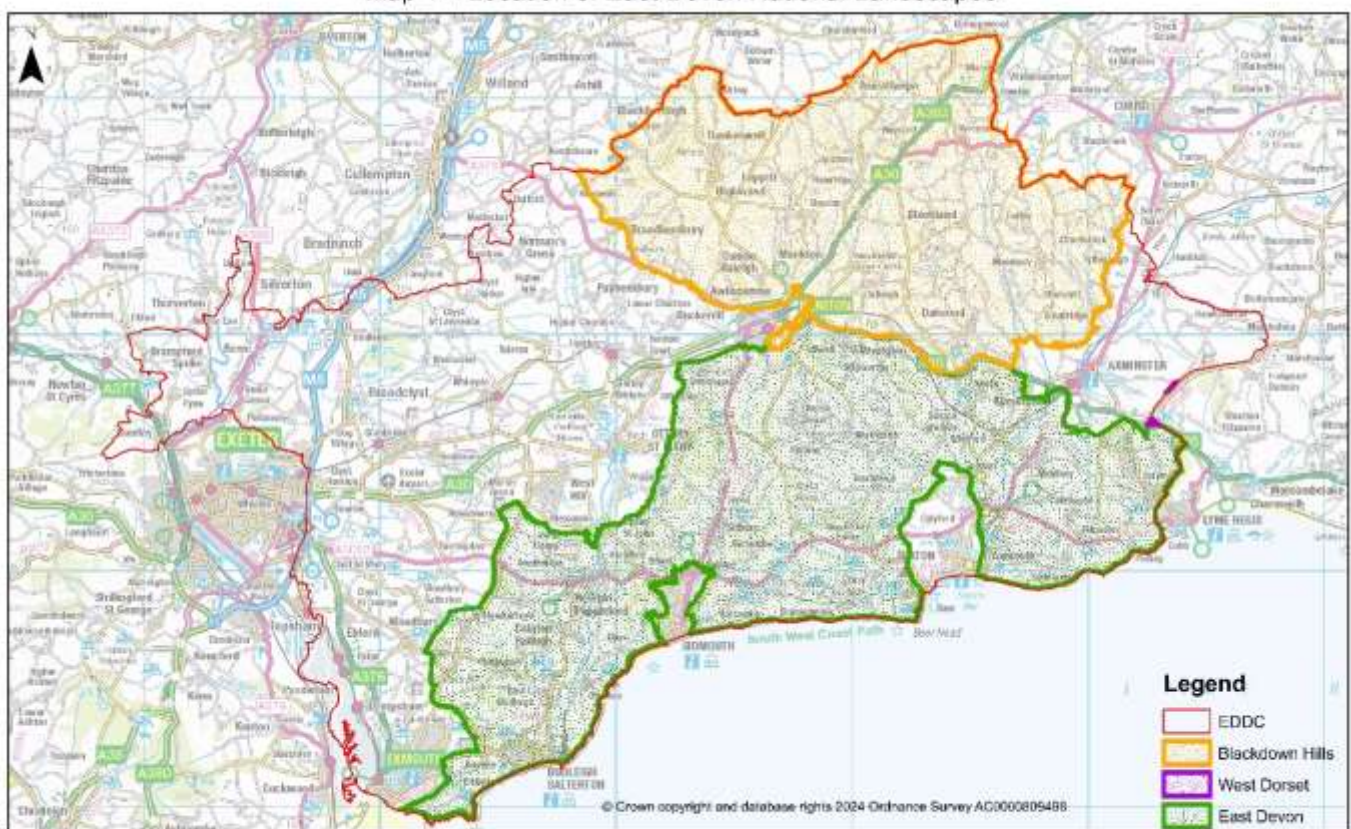
⁵ [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK \(www.gov.uk\)](#)

3 The East Devon Context

3.1 There are three separate national landscape designations in East Devon that take up around 57% of the Districts landmass, as shown on map 1. They are:

- The East Devon National Landscape (EDNL), which is around 32.7% of the landmass.
- The Blackdown Hills National Landscape (BHNL), which is around 24.3% of the landmass; and
- The Dorset National Landscape, which is just 0.02% of the landmass.

Map 1 – Location of East Devon National Landscapes



3.2 The Dorset National Landscape is located primarily in Dorset, but includes two very small areas on the eastern border of East Devon, near to Raymond's Hill, Axminster. No allocations are proposed in the vicinity so the focus of this part of the paper is on the characteristics of the East Devon and Blackdown Hills National Landscapes.

3.3 The East Devon National Landscape is wholly within the District of East Devon and there is published planning guidance⁶ on how to define and assess major development within it.

⁶ [PLANNING-Guidelines-Revised-08_21_2MB.pdf \(eastdevon-nl.org.uk\)](#)

The special qualities of the East Devon National Landscape are set out in the Partnership Plan⁷. It is noted for dramatic coastal scenery, heathland commons on remote plateaux and intricate patterns of small fields, hedgerows and woodland copses. There are elevated fingers of land extending south from the Blackdown Hills that contrast with the broad flat floodplains of the Axe and Otter. Relevant extracts from the EDNL management plan and planning guidance are reproduced in Appendix A.

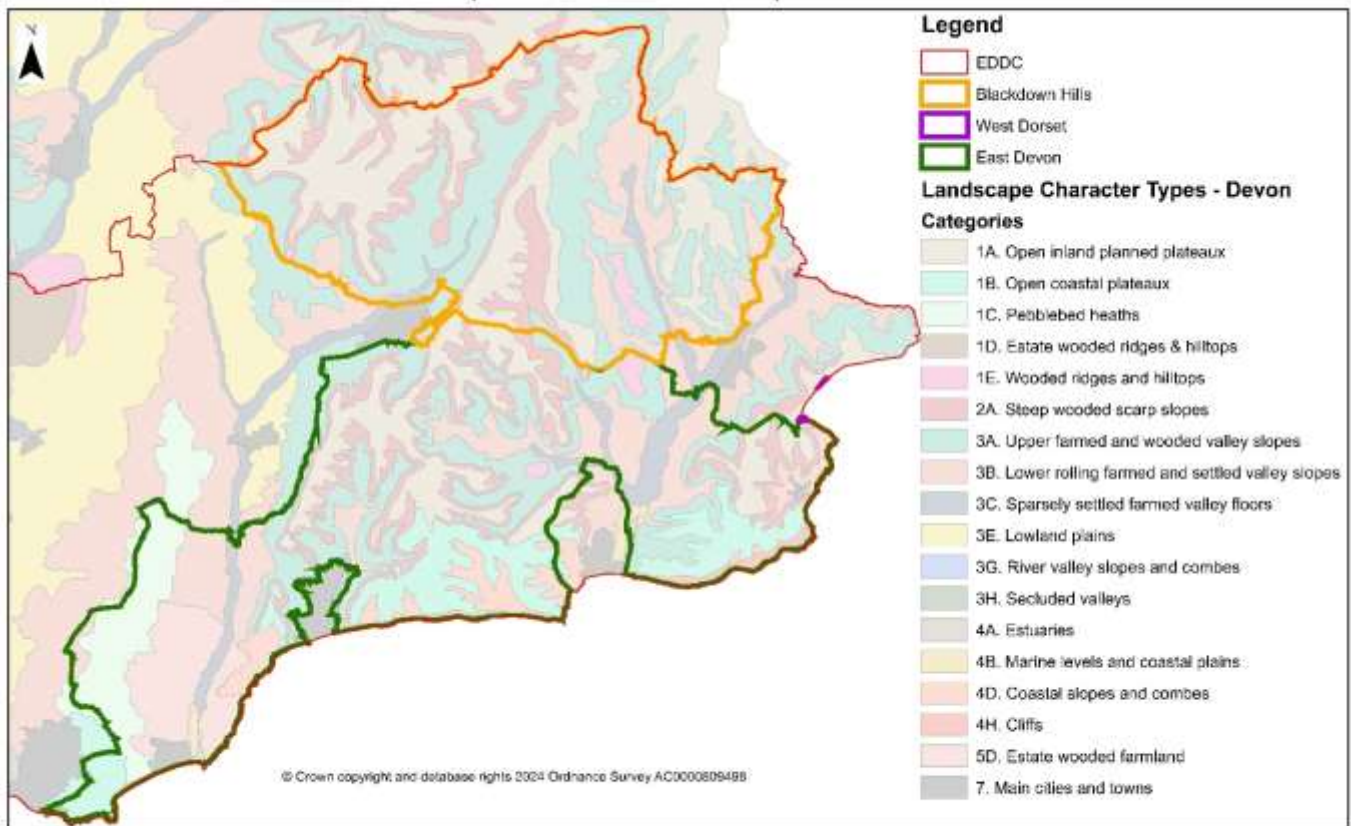
- 3.4 The Blackdown Hills National Landscape is mainly in East Devon, but also includes parts of Mid Devon and Somerset. It is described as an isolated and unspoilt rural area with winding lanes, hidden valleys and relatively remote villages. It has a distinct topography of a flat-topped plateau, sharp ridges and spring-lined valleys with rough grassland, mire and woodland vegetation on the valley sides. The Blackdown Hills are also noted for having a concentration of buildings where the vernacular character is particularly well preserved, and buildings fit naturally into their surroundings. The special qualities of the landscape are set out in the Blackdown Hills Management Plan, which also includes guidance on major development⁸: relevant extracts are reproduced in Appendix B.
- 3.5 A landscape character assessment⁹ of East Devon was undertaken in 2019 by landscape professionals on behalf of East Devon District Council, working with Devon County Council, the Blackdown Hills AONB partnership and the East Devon AONB partnership. A Landscape Character Assessment is a tool to help understand what the landscape is like today, how it came to be like that, and how it may change in the future. The assessment identifies areas with a certain character profile and describes the key characteristics of each character type, together with what makes each landscape special. Within the national landscapes these landscape character types create a particularly intricate pattern that reflects the diversity of components that form the landscape, as illustrated on Map 2. This shows that there is a great variety in the character of the landscapes that comprise the national landscapes and that the context of each allocation is important when determining whether development would constitute major development.

⁷ [AONB-Partnership-plan_lowres_final.pdf \(eastdevonaonb.org.uk\)](#)

⁸ [bhaonb_management_plan_2019-24.pdf \(blackdownhillsaonb.org.uk\)](#)

⁹ [Cover front.indd \(eastdevon.gov.uk\)](#)

Map 2 –East Devon Landscape Character



3.6 The landscape character types covered by national landscapes are:

1a Open inland planned plateaux;

1B Open coastal plateaux;

1C Pebblebed Heaths;

1E Wooded ridges and hilltops;

2A Steep wooded scarp slopes;

3A Upper farmed and wooded valley slopes;

3B Lower rolling farmland and settled valley slopes;

3C Sparsely settled farmed valley floors;

4A Estuaries;

4B Marine levels and coastal plains;

4D Coastal slopes and combes;

4H Cliffs;

5D Estate wooded farmland; and

7 Urban

4 Identifying ‘Major Development’ in the National Landscapes of East Devon

- 4.1 National Planning Guidance¹⁰ states that, before a national landscape can be designated, it must meet the ‘natural beauty criterion’. The National Landscapes in East Devon have been designated to conserve and enhance their natural beauty, which arises from a combination of factors that include landscape and scenic quality, relative wildness and tranquillity, natural heritage features and cultural heritage. Each National Landscape has a different combination of factors that justify its designation that are referred to as ‘special qualities’. There is a national requirement to have a management plan for each national landscape in which its special qualities are assessed. The most relevant parts of the management plans that apply in East Devon are included in Appendix A (EDNL) and Appendix B (BHNL).
- 4.2 The footnote to paragraphs 182 and 183 of the NPPF states that a decision on whether a proposal constitutes major development depends in part on ‘whether it could have a significant adverse impact on the purposes for which the area has been designated’, which involves an assessment of the ‘special qualities’ of the area. The footnote also sets out the need to consider the ‘nature, scale and setting’ of the proposal when deciding if it constitutes ‘major development’.
- 4.3 To ensure a consistency of approach, assessments of the proposed local plan allocations have been guided by a ‘checklist’ of factors that take account of both national planning policy/guidance and local factors, including Landscape Character Type. The process is based on recording site information (site reference, maps, scale and nature of development, photographs and site description). This is followed by a series of questions that link to the NPPF criteria, the ‘special qualities’ identified in the relevant management plan and the Natural England guidance¹¹ on meeting beauty criteria for national landscape designation. The specific questions used for each national landscape are tailored to the special qualities. The scale of housing development is related to the number of homes in the existing related settlement so that an increase in dwellings of 10% or more is generally considered to ‘major’ development under this criterion. The blank template used for the EDNL is included in Appendix C and for the BHNL in Appendix D.

¹⁰ [Areas of outstanding natural beauty \(AONBs\): designation and management - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/424222/areas_of_outstanding_natural_beauty_aonbs_designation_and_management.pdf)

¹¹ Natural England [guidance](#) on meeting beauty criteria for national landscape designation

5 The 'Exceptional Circumstances' Assessment

- 5.1 Any site found to constitute 'major' development in the context of NPPF paragraph 182 must be tested against the criteria set out in paragraph 183 of the NPPF to determine whether there are 'exceptional circumstances' that would justify development in the 'public interest'. Three tests are set out in the NPPF to help assess this:
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- 5.2 In the context of the allocation of sites for the local plan, the first two NPPF criteria (need for the development and cost/scope for developing elsewhere) will be assessed against the spatial strategy for the plan. Strategic Policy SP01 of the Regulation 19 local plan sets out that the spatial strategy as follows:

Strategic Policy SP01: Spatial Strategy

New development will be directed towards the most sustainable locations in East Devon, by:

- A. Focusing new development at the West End of the district, including a further new community, on-going development of Cranbrook and other major strategic developments close to Exeter. The West End is not spatially defined by a line on a map, rather it is term that applies to development proposals and site allocations are referred to in this Chapter of the plan.
- B. Promoting the most significant development levels, other than at the West End, at the Principal Centre of Exmouth.
- C. Promoting significant development at the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth to serve their own needs and that of the wider surrounding areas;
- D. Supporting development at the Local Centres of Broadclyst, Budleigh Salterton, Colyton, Lymptone, and Woodbury that meets local needs and those in the immediate surroundings;
- E. Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.

Settlements not listed above, with the exception of Cranbrook and Broadclyst Station which are addressed through the Cranbrook Plan, are defined as in 'open countryside' for the purposes of the Local Plan. The open countryside definition also excludes any location that falls in a defined settlement boundary or any site or area of land that is explicitly allocated or identified in the Development Plan for built development. In the open countryside more restrictive planning policies apply.

- 5.3 Both the Blackdown Hills and East Devon guidance advocate the assessment of alternative sites that could result in less harm to the national landscape. In the assessment of proposed local plan allocations, this approach has been supplemented by consideration of Strategic Policy SP01. Development that is broadly in accordance with SP01 around an individual settlement has therefore been compared with any other suitable and available sites around that settlement, rather than being assessed in relation to sites in or around other settlements, even if they would have a lesser impact on the special qualities of the national landscape. More details of alternative sites considered for allocation can be found in the relevant site allocations document (SAL-005 to SAL-048, with the related methodology being set out in SAL-001).
- 5.4 The agreed assessment process allows for the cumulative impact of sites that affect national landscapes to be taken into account. For example, if there were several suitable and available sites around a Tier 4 settlement that would result in more than 'limited development to meet local needs', this would be taken into account when assessing the 'need' for the development in the context of Paragraph 183 of the NPPF. However, in

practice, the development levels proposed through allocations are considered to be compatible with the development strategy of the local plan.

- 5.5 The third NPPF criteria (environmental/landscape impact) has been assessed through individual site assessments made in accordance with the methodology set out for plan making¹².
- 5.6 Proposed allocations that constitute major development have been assessed against the factors set out above and through completion of form 3, which forms Appendix E.

6. Summary of results

- 6.1 88 housing allocations are included in the local plan as indicated on Map 3: Proposed Local Plan Allocations Regulation 19. The allocations provide for a total of 9,367 homes within the plan period (2020 to 2042). In addition, 4,170 homes allocated in the Cranbrook Plan will be delivered in the local plan period.
- 6.2 15 allocations are wholly within a national landscape and these account for 951 new homes and around 5 hectares of employment land. This is around 7% of the total of new homes planned through allocations (in both the local plan and the Cranbrook Plan). One allocation (Gitti_05) is partly within a NL, but no development is proposed on this part of the site. 7 allocations (including Gitti_05) are adjacent to a national landscape. These allocations also make provision for 951 new homes, which is again around 7% of the total of new homes planned through allocations. It should be noted that the largest of these sites (Exmo_20) has an allocation of 700 homes and 2 hectares of employment land. Although some of the site is adjacent to the East Devon National Landscape, large parts of it are more than 1 kilometre away. Caution should therefore be exercised when considering figures relating to the overall scale of homes allocated on sites adjacent to a national landscape.
- 6.3 All sites within or adjacent to a national landscape were assessed for whether they constitute major development in the context of the national landscape.
- 6.4 Table 1 includes a summary of both the ‘major’ and ‘exceptional circumstances’ (where needed) assessments. Details of individual assessments follow on a settlement basis in alphabetical order.

Map 3 - Proposed Allocations in Regulation 19 Local Plan

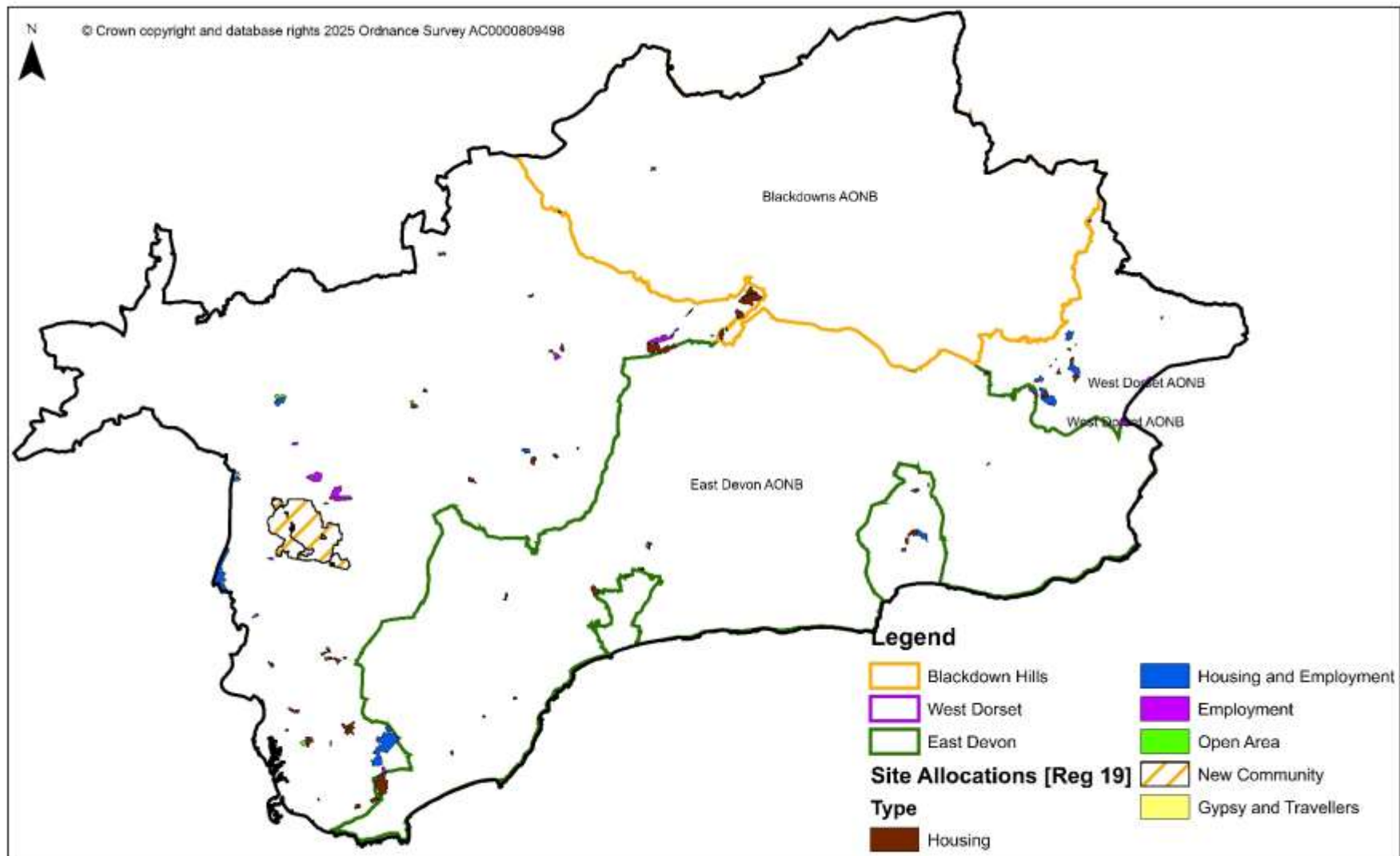


Table 1: Summary of major and exceptional circumstances assessments					
Settlement	Site	Scale	National Landscape	Major?	Exceptional Circumstances?
Axminster	Axmi_01a	3.3 ha employment	Within East Devon	No	N/A
Broadhembury	Brhe_00	10 dwellings	Adjacent Blackdown Hills	No	N/A
Budleigh Salterton	Budl_02	35 dwellings	Within East Devon	Yes	Yes
Dunkeswell	Dunk_05	43 dwellings	Within Blackdown Hills	No	N/A
East Budleigh	Ebud_01	22 dwellings	Within East Devon	Yes	Yes
Exmouth	Exmo_17	410 dwellings and 1.6 hectares employment	Within East Devon	Yes	Yes
Exmouth	Exmo_20a	700 new homes and 2 hectares employment	Adjacent East Devon	No	N/A
Exmouth	Exmo_18	2.7 ha employment	Adjacent East Devon	No	N/A
Honiton	Honi_07 & Honi_12	101 dwellings	Within Blackdown Hills	Yes	Yes
Honiton	Honi_13	10 dwellings	Within Blackdown Hills	No	N/A
Honiton	Honi_18	136 dwellings	Adjacent Blackdown Hills	Yes	Yes
Honiton	Gitti_05	310 dwellings	Partly within and partly adjacent East Devon	No	N/A
Honiton	GH/ED/39b	100 dwellings	Adjacent Blackdown Hills	No	N/A
Kilmington	Kilm_09 and Kilm_10	28 dwellings	Within East Devon	No	N/A
Musbury	Musb_01a	22 dwellings and 0.06 ha employment	Within East Devon	No	N/A

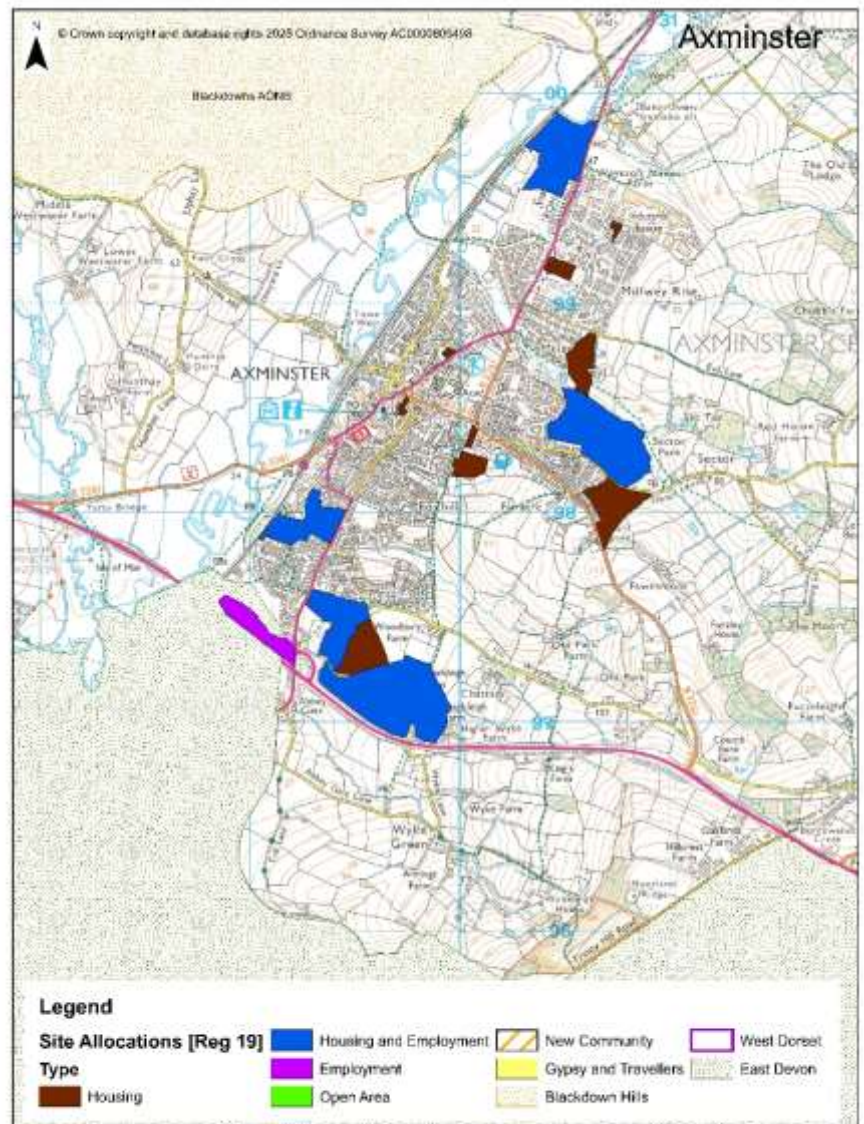
Table 1: Summary of major and exceptional circumstances assessments					
Settlement	Site	Scale	National Landscape	Major?	Exceptional Circumstances?
Newton Poppleford	Newt_04 & Newt_05	55 dwellings	Within East Devon	Yes	Yes
Otterton	Otto_01	10 dwellings	Within East Devon	Yes	Yes
Sidbury	Sidm_34	43 dwellings	Within East Devon	Yes	Yes
Sidmouth	Sidm_01	127 dwellings	Within East Devon	Yes	Yes
Sidmouth	Sidm_06a	30 dwellings	Within East Devon	Yes	Yes
Sidmouth	Sidm_31	15 dwellings	Within East Devon	No	N/A
Tipton St. John	Otry_04	A primary school and 5 dwellings	Adjacent East Devon	No	N/A

7 Axminster Context and Summary



Axminster is located to the south and east of the Blackdown Hills National Landscape (BHNL) and to the north of the East Devon National Landscape (EDNL).

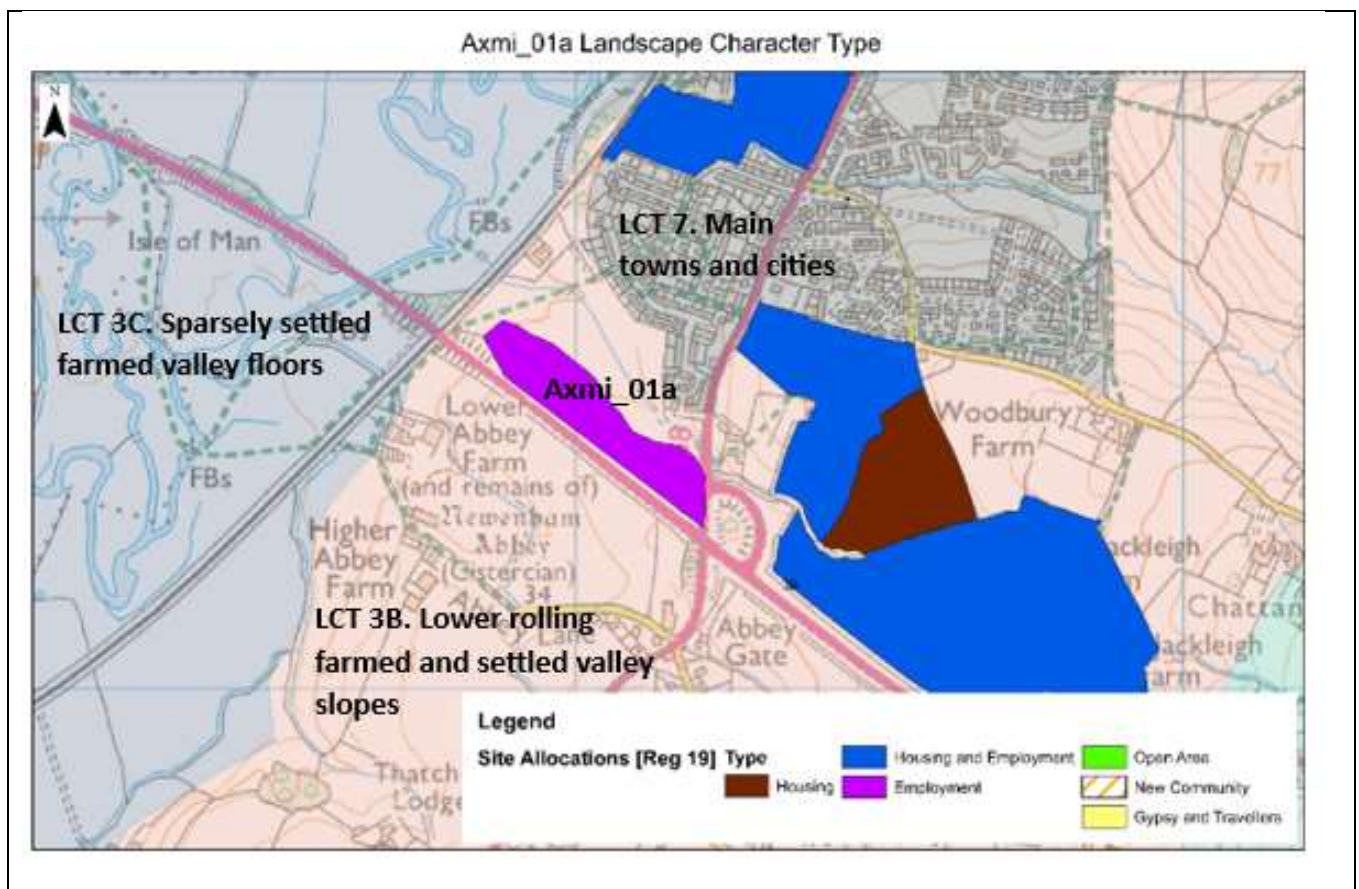
A small part of the EDNL extends to the north of the A.35 and this includes most of the employment allocation of Axmi_01a. This is the only Axminster site that is located within a national landscape, and none of the other allocations proposed are considered to have impacts that would require an assessment of whether they constitute major development in the context of a national landscape.

The allocation of Axmi_01a is not considered to constitute major development in the context of the national landscape.



7.1 Major Development Assessment Axmi_01a

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Axmi_01a
3. Map	4. Aerial map
	



5. Nature of development ¹³	Employment
6. Scale of development ¹⁴	3.3 ha
7. Setting	A large field with gently rolling landform bounded by the A.35 trunk road, railway line and the A358. There is housing and a sewage works on the other side that is outside of the national landscape. The A.35, which is constructed on an embankment above the level of the field, isolates the site from the rest of the national landscape.
8. Coastal scenery ¹⁵	No impacts.
9. Heathland commons	No impacts
10. Elevated land	No impacts.


¹³ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

¹⁴ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

¹⁵ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

11. Agricultural valley bottoms	The agricultural use makes some contribution to the scenic beauty of the area.
12. Landscape quality ¹⁶	The landscape assessment of this site found the site to be of high / medium landscape sensitivity with a 'medium' susceptibility to change.
13. Scenic quality	Medium impact - the site has some scenic qualities, but also some intrusive elements from the relationship with the urban edge and A35.
14. Relative wildness	Low impact - the site has low levels of wildness and is part of a managed landscape at the edge of a town.
15. Relative tranquillity	Low impact - the adjoining housing, railway line and traffic on the adjacent A35 restrict levels of tranquillity.
16. Natural heritage features	Low impact - there are few trees and hedges on the site.
17. Cultural heritage	Medium impact - the site is close to two scheduled ancient monuments (Cistercian Abbey and Roman Fort). It may contain archaeological artifacts from Prehistoric times to the mid C20th. There are two WWII pill boxes in the site, that are non-designated heritage assets.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	No.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No

¹⁶ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

20. Photos	 <p data-bbox="480 689 1241 723">Looking northeast across the site from close to the railway line.</p>
21. Would allocation constitute major on one criterion?	No.
22. Would allocation constitute major with any combination of criteria?	No
23. Major development?	No

8. Broadhembury Context and Summary

Broadhembury is located on the edge of the Blackdown Hills National Landscape (BHNL) and the majority of the built-up area of the village is within the BHNL.



One allocation for 10 dwellings is proposed at Broadhembury, Brhe_09.

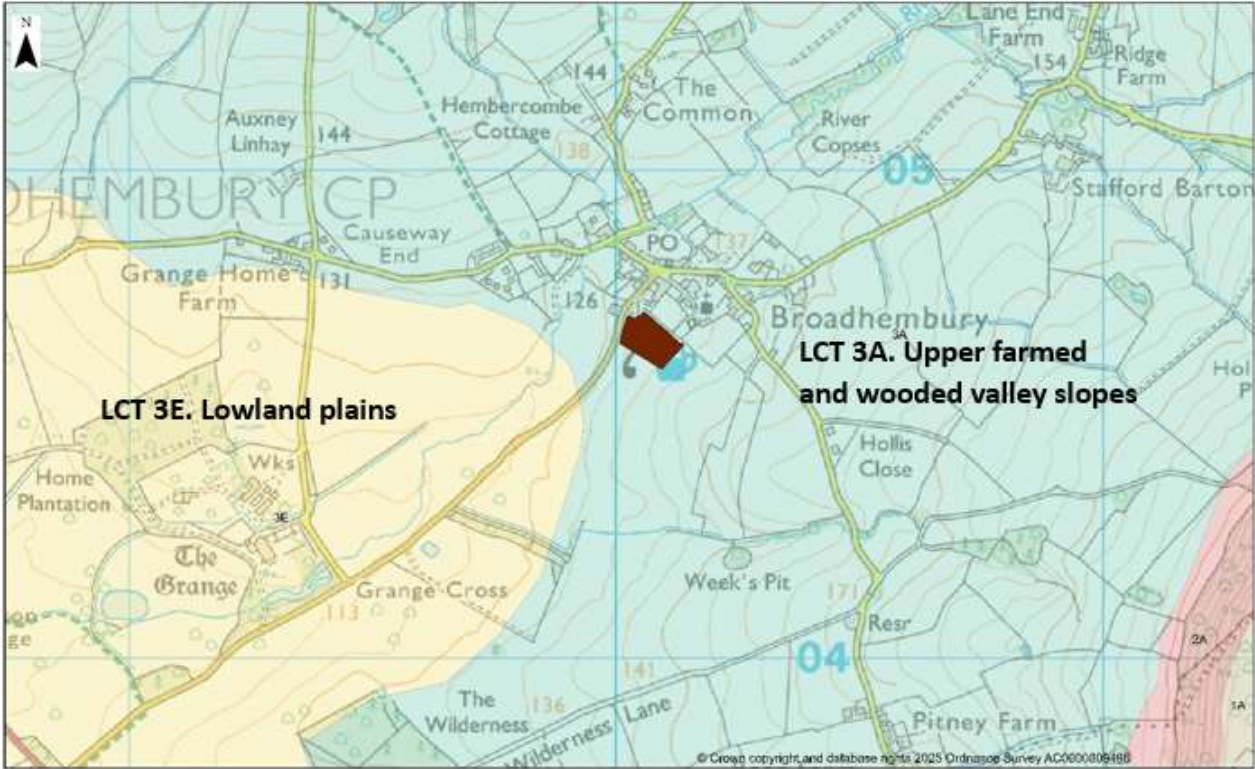
The allocation is located outside of, but adjoining the BHNL and there is some intervisibility between the site and the NL.

The allocation is not considered to constitute major development in the context of the national landscape.



8.1 Major Development Assessment Brhe_09

Form 2: Assessment of Major Development in the Blackdown Hills National Landscape	
Criteria	Assessment
1. Protected Landscape	Blackdown Hills
2. Reference	Brhe_09
3. Map	4. Aerial map
<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  </div> <div style="text-align: center;">  </div> </div>	

Brhe_09 Landscape Character Type	
	
5. Nature of development ¹⁷	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ¹⁸	10 dwellings. Broadhembury Parish has a population of 732, which equates to 350 homes. However, within the village (the area shown on the map at paragraph 3.1) there are around 100 homes The percentage increase in the number of homes would therefore be around 10%.
7. Setting	The site is open and rural, albeit on the edge of the village. Broadhembury is located on the edge of the BHNL, but the site and the land to the south and west are outside of the BHNL. The settlement edge is quite modern but there are glimpses of the tighter, historic village core beyond the site. There will be medium range views of the site from the south when approaching the village, but short range views are limited towards the north due to topography and vegetation.

¹⁷ Criteria 5, 6 and 7 are taken from the footnote to the NPPF



¹⁸ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

8. Isolation ¹⁹	Low impact - the site adjoins the village and is bordered on two sides by existing buildings.
9. Landscape Pattern	Medium impact - the site slopes down from east to west and comprises the northern corner of a much larger arable field. There are species rich boundary hedgerows with mature trees. Surrounding field parcels are of smaller size. LCT: 3A – Upper farmed and wooded slopes
10. Geology	Low impact - no distinctive features.
11. Architecture	Medium impact - the site is within 20m of a conservation area (although there are intervening non-designated buildings and land between). The centre of Broadhembury is notable for the concentration of vernacular buildings, many of which are listed. The topography and mature vegetation limit an appreciation of the local architecture from the site, with the exception of the grade 1 listed church tower.
12. Landscape quality ²⁰	The landscape assessment of this site found the site to be of high landscape value with a medium sensitivity to change.
13. Scenic quality	Medium impact - the site has some scenic qualities from its sloping landform and rural, pastoral appearance.
14. Relative wildness	Low impact - the site has low levels of wildness, being part of a managed landscape at the edge of a village.
15. Relative tranquillity	Low impact - the village hall and main road into the village lie to the west of the site and restrict levels of tranquillity.
16. Natural heritage features	Low impact - there are mature trees and hedges to the northern site boundary that could be retained. A new boundary would be required to the remainder of the field and offers opportunities for enhanced natural heritage features.
17. Cultural heritage	Medium impact - the site adjoins an historic village with a rich architecture.
18. Would any of the special qualities summarised in the Blackdown Hills management plan be affected by the proposed development? ²¹	No. The site comprises a small part of an agricultural field and is therefore part of the managed landscape, but the majority of this field would not be developed. There are mature hedgerows and trees to the north and west of the site, but these are not directly linked to any semi-natural habitats.
19. Is there a significant adverse impact on the purposes for which the	No

¹⁹ Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) 'The Special Landscape Character'

²⁰ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

²¹ See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf](#) (blackdownhillsaonb.org.uk)

<p>area has been designated or defined²²?</p>	
<p>20. Photos</p>	 <p>Site is filtered from view on approaching the village by trees and hedges.</p>  <p>There are some views across the site to the church, which is in the BHNL.</p>
<p>21. Would allocation constitute major on any one criterion?</p>	<p>Yes, there is a potential impact on heritage assets (the Church and conservation area), but the allocation requires a study of this and for proposals to show how adverse impacts will be avoided and where appropriate mitigated. There is also a potential impact on scenic quality, although the allocation requires that the site be landscaped to provide boundary screening appropriate to the edge of National Landscape location.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>Yes, the scale of development would be around 10% of the current number of dwellings in the main village.</p>
<p>23. Major development?</p>	<p>No, the location of the site outside of the BHNL and on the edge of the settlement limit any impact on the special qualities of the National Landscape so the proposed allocation is not considered to constitute major development.</p>

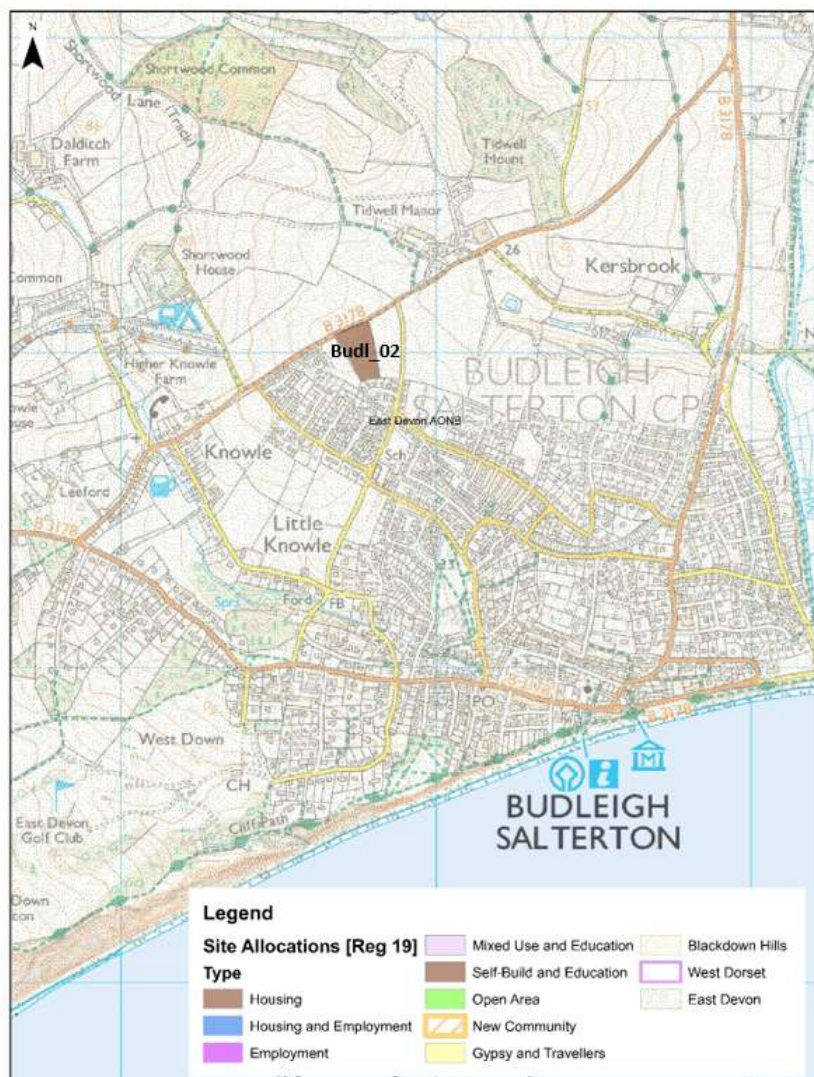
²² Blackdown Hills [Management](#) Plan and extract of page 19 in Appendix 2

9. Budleigh Salterton Context and Summary

Budleigh Salterton is a town located within and 'washed over' by the East Devon National Landscape (EDNL).

Five sites were considered to be reasonable alternatives for housing allocations. One site is allocated for 35 dwellings, Budl_02.



Budl_01 and Budl_03 were rejected largely on landscape grounds. Budl_05 has a capacity for less than 5 outside of the area at risk of flooding so was rejected on that basis. Budl_06 forms part of the Budleigh Salterton Community Hospital and was rejected as development would lead to the loss of its current use by the NHS as a health and wellbeing hub, providing local employment and a community facility.



The allocation is considered to constitute major development in the context of the national landscape, for which there are exceptional circumstances.

It should be noted that representations made on behalf of the developer concluded that the proposed allocation did not constitute major development.

9.1 Major Development Assessment Budl_02

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Budl_02
3. Map	4. Aerial map
 <p>This is a planning map showing the boundaries of Budl_02. The map includes labels for 'Tidwell', 'Barton', and 'Tawell Manor'. A legend in the bottom right corner identifies 'Allocations_Reg19' with a black outline, 'Blackdown Hills' with a yellow outline, 'West Dorset' with a green outline, and 'East Devon' with a light green outline. A north arrow is present in the bottom left corner.</p>	 <p>This is an aerial photograph of the Budl_02 site. The site is outlined in black and labeled 'Budl_02'. It is situated adjacent to a large body of water (likely a reservoir or lake) and a residential area with buildings and roads. A legend in the bottom right corner identifies 'Allocations_Reg19' with a black outline. A north arrow is present in the bottom left corner.</p>

Budl_02 Landscape Character Type	
5. Nature of development ²³	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ²⁴	35 dwellings. Budleigh Salterton has a population of 5,379, which equates to 2,573 homes. The percentage increase in the number of homes is around 1.3%.
7. Setting	The site is open and rural, albeit on the edge of the town. Budleigh Salterton is located within the East Devon National Landscape. The settlement edge is modern but trees and hedgerows screen this from the site to some extent. The landscape is semi-enclosed with clear views from the settlement edge, to which the site makes a limited positive contribution. Landscape Character Type (LCT) 5D Estate wooded farmland.
8. Coastal scenery ²⁵	No impacts.
9. Heathland commons	No impacts



²³ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

²⁴ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

²⁵ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

10. Elevated land	No impacts.
11. Agricultural valley bottoms	The agricultural use and field patterns, of which the site forms a part, contribute to the scenic beauty of the area.
12. Landscape quality ²⁶	The landscape forms part of the wider rural setting for the town, but its landscape quality is diminished by its relationship with the existing urban edge and a lack of special qualities representative of the EDNL.
13. Scenic quality	Medium impact - the landscape assessment of this site found the site to have a medium scenic quality.
14. Relative wildness	Low impact - the site has low levels of wildness, being is part of a managed landscape at the edge of a town.
15. Relative tranquillity	Low impact - the adjoining housing and traffic on the adjacent B3178 restrict levels of tranquillity.
16. Natural heritage features	Medium impact - there are mature trees and hedges to some boundaries. Extensive boundary planting would be required.
17. Cultural heritage	High impact - Tidwell House is a grade II* listed building is located around 275 metres to the northeast. Development of the site has the potential to affect it's setting, but this impact could be mitigated through careful design and landscaping.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	Yes. The site comprises a small agricultural field that contributes to the scenic quality of the National Landscape. Development of the site also has the potential to impact on the setting a listed building, which would diminish the cultural heritage of the EDNL.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No

²⁶ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

<p>20. Photos</p>	 <p>Looking south from field access to B3178</p>  <p>View from northern site boundary along B3178</p>
<p>21. Would allocation constitute major on one criterion?</p>	<p>Yes, criteria 11, 12, 13 and 17.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>Yes</p>
<p>23. Major development?</p>	<p>Yes</p>

9.2 Exceptional Circumstances Assessment Budl_02

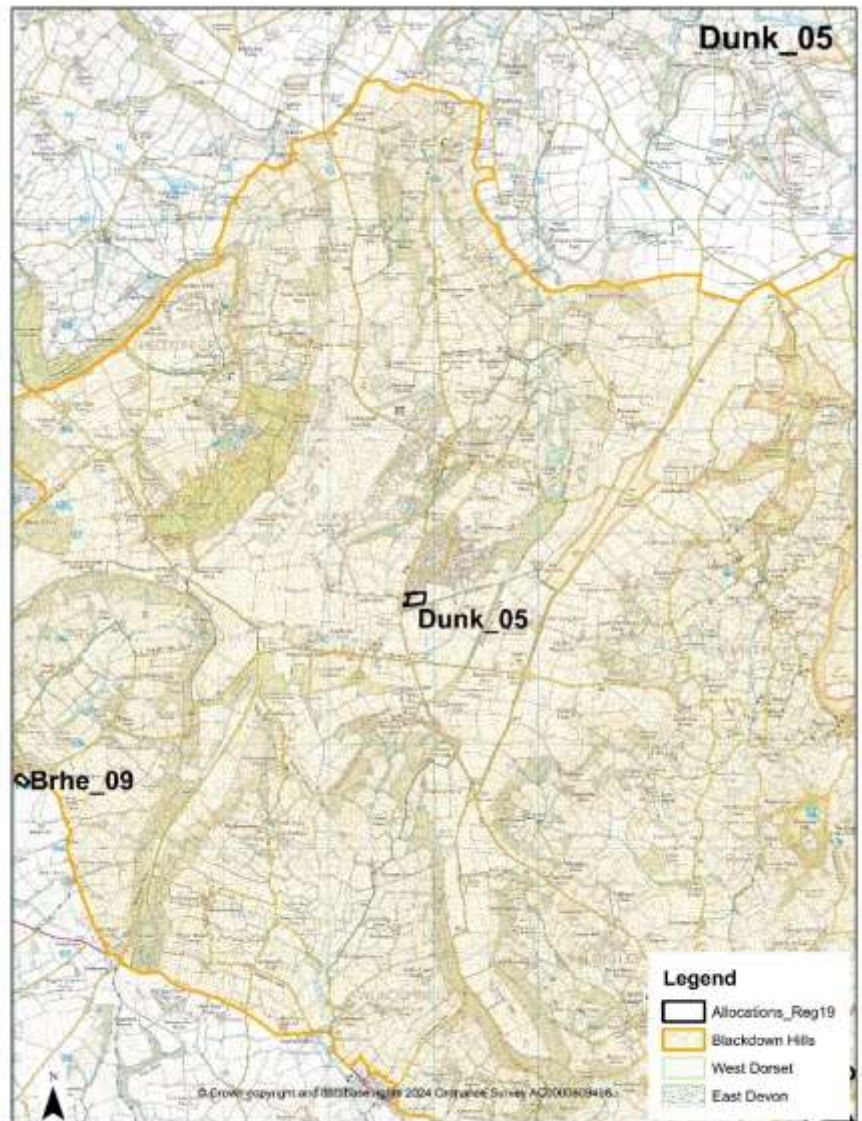
Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Budl_02
<p>Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?</p>	<p>Budleigh Salterton is designated as a local centre in the local plan and the plan strategy is for growth to meet the needs of the town and the surrounding areas.</p> <p>The percentage increase in the number of homes as a result of the allocation is around 1.4%, and if existing permissions are included, this rises to around a 3.5%. This is a significantly lower rate of expansion than the other local centres (around 17% in Broadclyst, 13% at Colyton, 12% for Lypstone and 27% at Woodbury).</p> <p>The scale of development is below the level that would be expected through the plan strategy alone.</p>
<p>Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?</p>	<p>Two other sites were considered for inclusion in the Regulation 18 local plan (Budl_01 and Budl_03). Both sites were ultimately discounted due in large part to potential impacts on the national landscape. There are no suitable alternative sites identified and all sites in Budleigh Salterton are in the EDNL.</p>
<p>Are there any cumulative impacts on the national landscape from other proposed allocations?</p>	<p>No, only one allocation is proposed in Budleigh Salterton.</p>
<p>What is the predicted landscape impact? Can any detrimental impacts be mitigated?</p>	<p>The landscape is sensitive to change, but detrimental impacts can be mitigated to some extent.</p>
<p>What is the predicted environmental impact? Can any detrimental impacts be mitigated?</p>	<p>Ecological impacts are minimal, and no other environmental impacts are noted.</p>
<p>Are there any 'exceptional circumstances' that would justify development in the 'public interest'.</p>	<p>Yes</p> <p>The plan strategy to direct local growth to the town and surrounding areas has been reduced in the interests of the NL. The lack of alternative sites with less impact on the NL and the plan strategy of directing growth to the town constitute exceptional circumstances to justify the allocation.</p>

10. Dunkeswell Context and Summary

Dunkeswell is a village located within and ‘washed over’ by the Blackdown Hills National Landscape (BHNL).

One allocation is made for 43 dwellings at Dunk_05.

The allocation is not considered to constitute major development in the context of the national landscape.



10.1 Major Development Assessment Dunk_05

Form 2: Assessment of Major Development in the Blackdown Hills National Landscape	
Criteria	Assessment
1. Protected Landscape	Blackdown Hills
2. Reference	Dunk_05
3. Map	4. Aerial map
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Dunk_05 Landscape Character Type	
5. Nature of development ²⁷	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ²⁸	<p>43 dwellings.</p> <p>Dunkeswell has a population of around 1500, which equates to 717 homes. The percentage increase in the number of homes would be more than 16%. However, in terms of visual impacts, Dunkeswell is unusual in having a very high level of industrial development, focussed on the former WWII airfield. This means that the perception of additional built form, when compared to the scale of the overall settlement, would be much lower than the 16% increase in housing numbers suggests.</p>
7. Setting	The site is located on the edge of Dunkeswell. The site can be seen from the south and glimpsed in long range views, but it is screened by existing development in short range views and seen in the context of adjacent housing. There are two mature trees on the site frontage that should be retained.

²⁷ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

²⁸ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

8. Isolation ²⁹	Low impact - the site adjoins the village and is bordered on two sides by a loose ribbon of 20th C dwellings.
9. Landscape Pattern	Low impact – the site comprises a flat field adjoining housing on 2/3 sides. The landscape character type is 1A. Open inland planned plateaux. This is a relatively simple landscape, with strong horizontal elements: flat horizons, straight roads and regular field boundaries. Development of the site will be compatible with the landscape pattern.
10. Geology	Low impact – the only distinctive features are the flatness of site and its setting.
11. Architecture	Low impact – there is little vernacular character in surrounding housing.
12. Landscape quality ³⁰	Low impact - the landscape quality of the site is unremarkable.
13. Scenic quality	Low impact - the site has few scenic qualities.
14. Relative wildness	Low impact - the site has low levels of wildness, being is part of a managed and suburban landscape.
15. Relative tranquillity	Low impact - there are houses on three sides of the site so human activity is likely to restrict levels of tranquillity.
16. Natural heritage features	Medium impact - there are mature trees and hedges to the site boundaries that could be retained. There are two mature trees on the site frontage that should be retained.
17. Cultural heritage	Low impact - there is limited cultural heritage apparent on the site or within the related settlement.
18. Would any of the special qualities summarised in the Blackdown Hills management plan be affected by the proposed development? ³¹	No. The site comprises an agricultural field as is therefore part of the managed landscape, although the visual appreciation of this is marred by the single storey dwellings that have been built on part of the 'original' field fronting the road. There are hedgerows and trees on the site boundaries, but these are not directly linked to any semi-natural habitats.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined ³² ?	No

²⁹ Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) 'The Special Landscape Character'

³⁰ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

³¹ See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf](#) (blackdownhillsaonb.org.uk)

³² Blackdown Hills [Management Plan](#) and extract of page 19 in Appendix 2

<p>20. Photos</p>	 <p>Viewed for the road to the south, the site lies beyond this access and the adjoining gardens.</p>  <p>The site viewed from the adjacent housing estate. The boundary trees are protected by preservation orders.</p>
<p>21. Would allocation constitute major on any one criterion?</p>	<p>Yes, the scale of development would result in a 16% increase in housing numbers, although the overall visual impact would be lower as set out in 6 above.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>None of the other criteria indicate that the allocation constitutes major development.</p>
<p>23. Major development?</p>	<p>No, the lack of distinctive special qualities on the site, it's context on the edge of the settlement and screening mean that, despite the increase in scale, the site is not considered to constitute major development.</p>

11. East Budleigh Context and Summary

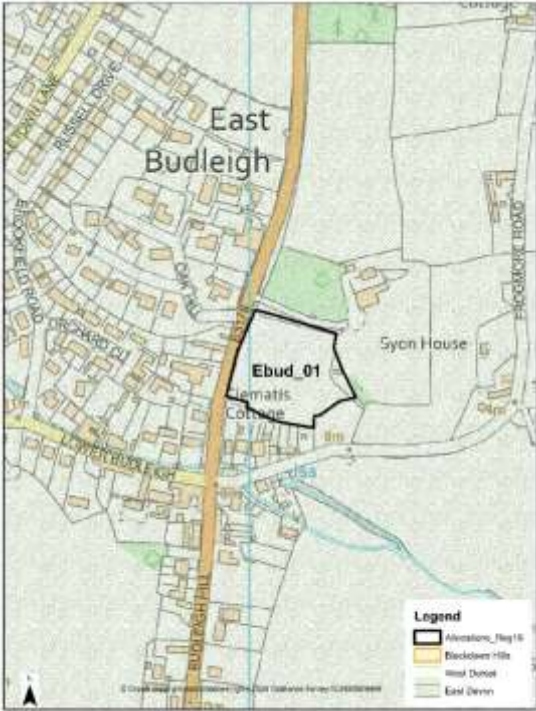

East Budleigh is a village located within and 'washed over' by the East Devon National Landscape (EDNL).

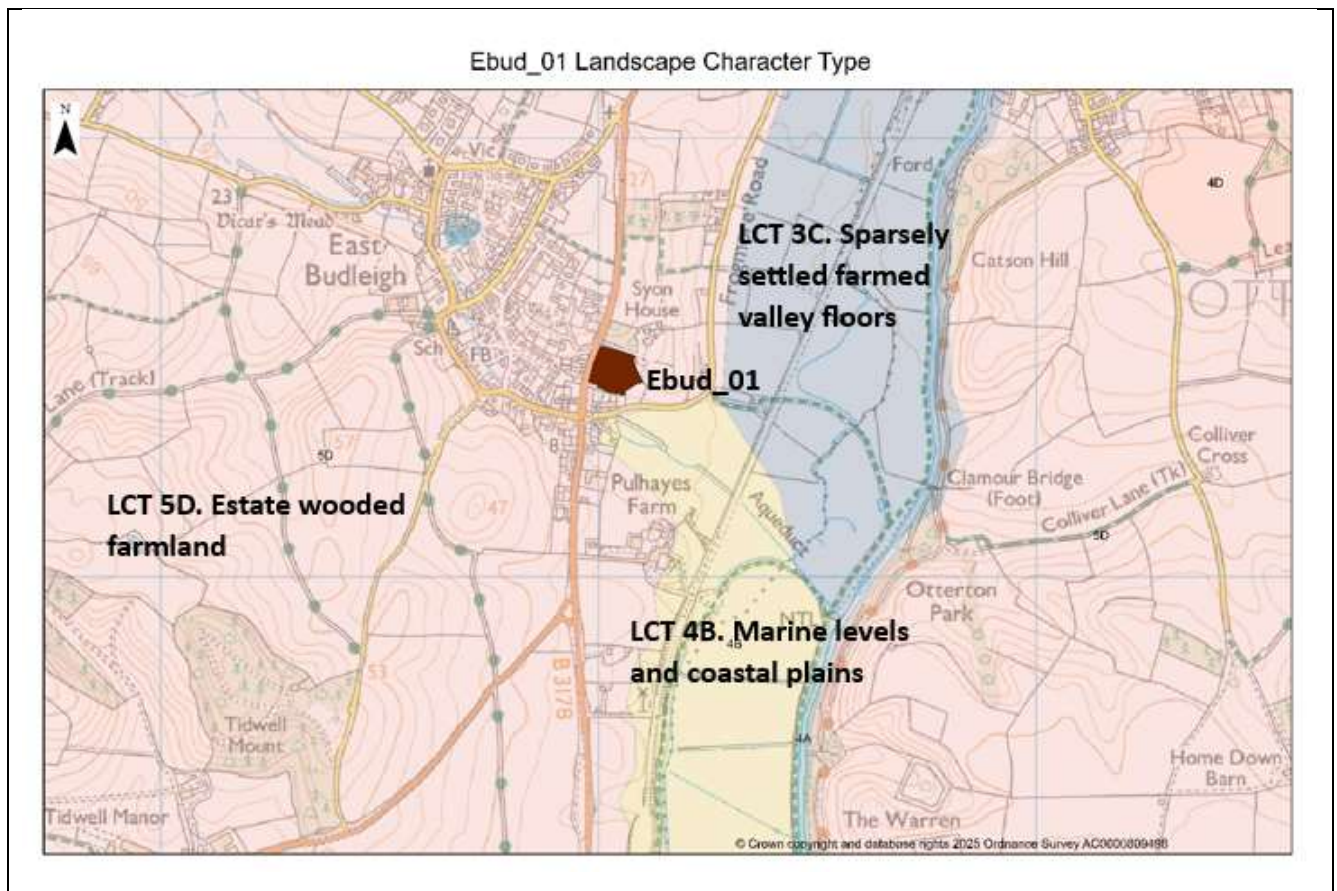
Only one reasonable alternative was considered at East Budleigh (Ebud_01) which is allocated for 22 dwellings.

The allocation is considered to constitute major development in the context of the national landscape which is justified by exceptional circumstances.



11.1 Major Development Assessment Ebud_01

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Ebud_01
3. Map	4. Aerial map
	



5. Nature of development ³³	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ³⁴	22 dwellings. East Budleigh has a population of 681, which equates to 325 homes. The percentage increase in the number of homes is around 6.7%.
7. Setting	The immediate context is the village edge (with a mix of modern and older houses), the busy B3178 and associated infrastructure. There is housing (both existing and consented) along two of the site boundaries and Syon House, a large, detached home, and its driveway and garden to the other sides. Landscape Character Type (LCT) 5D Estate wooded farmland.
8. Coastal scenery ³⁵	Site is visible from footpaths to south along Otter Estuary within LCT 4B. Marine levels and coastal plains.
9. Heathland commons	No impacts

³³ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

³⁴ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a ‘significant’ increase likely to be regarded as ‘major’ development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

³⁵ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

10. Elevated land	No impacts.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ³⁶	The landscape makes some contribution to local landscape character with its open appearance and gentle slope, but the immediate context is the village edge (with a mix of modern and older houses), the busy B3178 and associated infrastructure. The landscape appraisal for this site concluded that the overall landscape susceptibility was medium low with an overall landscape sensitivity of medium.
13. Scenic quality	Medium impact - the site has some rural character, but this is diminished by its location adjacent to the relatively busy B3178, overhead wires and street lighting.
14. Relative wildness	Low impact - the site has low levels of wildness, being is part of a managed landscape at the edge of a village.
15. Relative tranquillity	Low impact - the adjoining housing and traffic on the adjacent B3178 restrict levels of tranquillity.
16. Natural heritage features	Medium impact - there is a group of mature trees on adjoining land partly overhang the northwestern corner
17. Cultural heritage	Medium impact - the landscape has a visual relationship with Syon House, a non-designated heritage asset.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	Yes. Development of the site also has the potential to impact on the setting a non-designated heritage asset.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No

³⁶ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

<p>20. Photos</p>	 <p>Site has overhead lines modern and rendered wall to B3178 boundary.</p>  <p>Site has a relationship with Syon House, a non-designated heritage asset.</p>  <p>Site viewed from the Otter Estuary to the southeast with Syon House visible to the east.</p>
<p>21. Would allocation constitute major on one criterion?</p>	<p>Yes, criteria 18.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>Yes, criteria 17 and 18.</p>
<p>23. Major development?</p>	<p>Yes.</p>

11.2 Exceptional Circumstances Assessment Ebud_01

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Ebud_01
Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?	East Budleigh is designated as a service village in Strategy Policy SP0 of the Regulation 19 Plan. Limited development is encouraged in service villages. The percentage increase in homes as a result of the allocation is around 6.7%. When existing permissions are taken into account the increase in houses rises to around 8.5%. This level of growth is compatible with the plan strategy.
Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?	Two alternative sites were put forward for consideration (Ebud_02 and Ebud_03). Neither alternative site passed the site sifting stage so there is only one site under consideration to meet the plan strategy for limited growth in East Budleigh.
Are there any cumulative impacts on the national landscape from other proposed allocations?	No other allocations are proposed.
What is the predicted landscape impact? Can any detrimental impacts be mitigated?	The site assessment found that there would be a medium impact and that detrimental impacts could largely be mitigated.
What is the predicted environmental impact? Can any detrimental impacts be mitigated?	The site is adjacent to two nature recovery areas (woodland to north and east of site) and within 100m of an unconfirmed wildlife site. The site is also within the Exe Estuary and Pebblebed Heaths mitigation zones. Any detrimental impacts could be mitigated.
Are there any 'exceptional circumstances' that would justify development in the 'public interest'.	Yes. The scale of development is compatible with the local plan strategy and impacts on the national landscape are capable of mitigation.

12. Exmouth Context and Summary

The East Devon National Landscape wraps around the south and east of Exmouth and includes some of the existing built-up area.

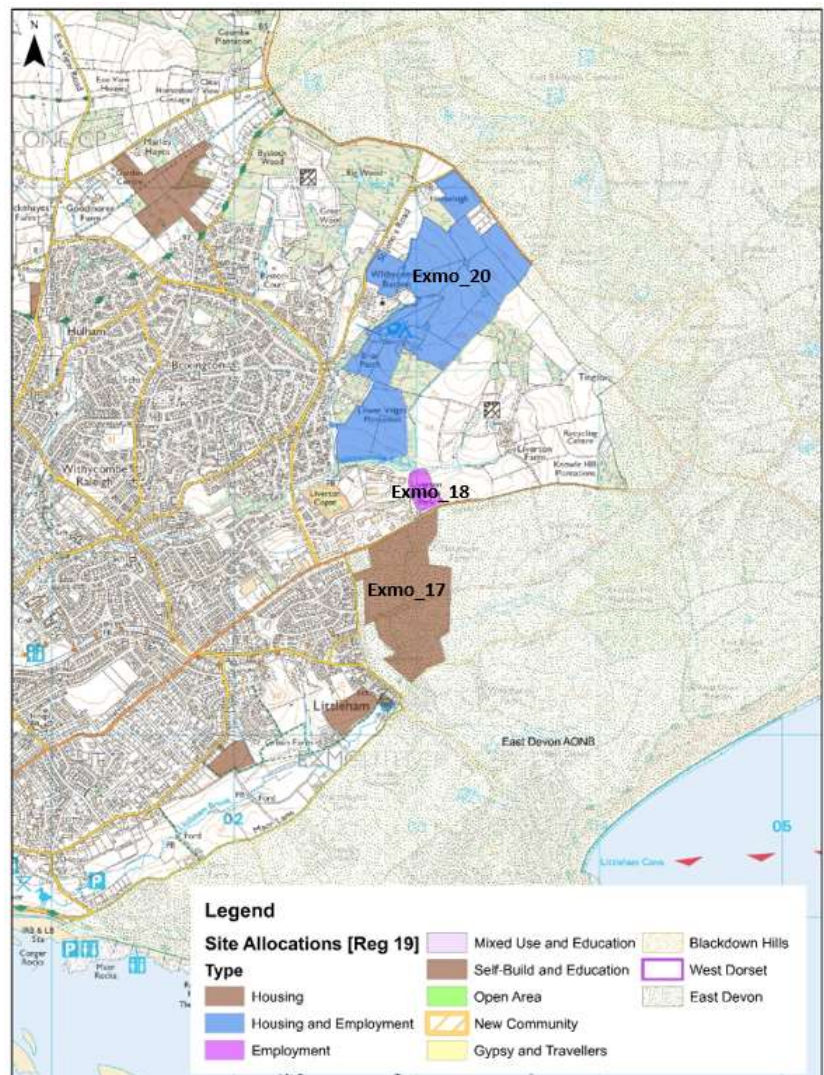
Exmouth is the largest town in East Devon and the local plan defines it as the principal settlement where significant development will be focussed. 12 allocations are proposed around the town with a yield of some 1455 dwellings plus 700 from existing permissions. In addition around 6.3 hectares of employment land is allocated.

22 reasonably alternative sites were considered for potential allocation in the Regulation 19 local plan (as set out in the sustainability appraisal). 10 sites are included as allocations, the remainder of the sites having been rejected

for a variety of reasons, including landscape sensitivity and potential impacts on the national landscape, as set out in the sustainability appraisal.

One of the proposed allocations is located in the EDNL (Exmo_17) and is considered to constitute major development in the NL which is justified by exceptional circumstances. One housing and employment and one employment allocation lie adjacent to the EDNL (Exmo_20 and Exmo_18 respectively). Neither site sites is considered to constitute major development in the context of the national landscape, although in the case of Exmo_20 this is subject to the provision that no built development other than an access road is included on the higher land adjacent to the EDNL.

No other sites in Exmouth are considered to have potential impacts on the NL that require a major development assessment for local plan allocation.



12.1 Major Development Assessment Exmo_17

Form 1: Assessment of Major Development in the East Devon National Landscape

Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Exmo_17

3. Map

4. Aerial map



Exmo_17 Landscape Character Type	
<p>The map displays the Exmo_17 site in purple, situated on the edge of Exmouth. Surrounding areas are categorized into different Landscape Character Types (LCTs): LCT 7 (Main cities and towns) to the west, LCT 1B (Open coastal plateaux) to the east and south, LCT 1C (Pebblebed Heaths) to the north, and LCT 4H (Cliffs) to the southeast. The map includes various geographical features like farms, plantations, and roads.</p>	
5. Nature of development ³⁷	<p>Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.</p> <p>Commercial/ mixed use –Office/warehouse/light industrial with associated parking.</p>
6. Scale of development ³⁸	<p>410 dwellings and 1.6 ha of employment use with supporting community uses.</p> <p>Exmouth has a population of 35,727, which equates to 17,094 homes. The percentage increase in the number of homes is around 2.4%.</p>
7. Setting	<p>The site is located on the edge of Exmouth and is wholly within the EDNL, as are the houses to the west and south of the site. To the north, on the opposite side of the B3178, is a modern business park. There are open fields to the east and southeast. The site slopes gently down from north the south. There are extensive views into and out of the site, including from/to EDNL. When viewed from the SW coastal path to the east the site is seen in the context of the built-up area of the town, but there are also views across the site and town to the Exe Estuary and the</p>




³⁷. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

³⁸ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

	<p>hills on the other side. Almost all of the site is within a Coastal Preservation Area (CPA) where there is a policy to protect the undeveloped coast from development.</p> <p>Landscape Character Type (LCT)1 B. Open coastal plateaux.</p>
8. Coastal scenery ³⁹	High impact - the EDNL is noted for its varied and dramatic coastal scenery. The southern part of the site is around 1500 meters from the sea cliffs at Sandy Bay and is within a CPA. Development of the site could have an impact on the coastal scenery of the EDNL.
9. Heathland commons	No impacts
10. Elevated land	No impacts.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ⁴⁰	The landscape quality of the site is high with the south of the site having an intimate quality whereas the higher northerly parts are starker.
13. Scenic quality	High impact - the intricate field pattern bounded by hedges and some mature trees have a high scenic quality although this is reduced in parts of the site due to the close proximity of the town and the B3178.
14. Relative wildness	Low impact - the site has low levels of wildness, being is part of a managed landscape at the edge of a large town.
15. Relative tranquillity	Medium impact - the adjoining housing and traffic on the adjacent B3178 reduce levels of tranquillity in the north of the site but levels of tranquillity are higher in the south.
16. Natural heritage features	Medium impact – a small watercourses run through the site and some of these are lined by trees, with some small groups of mature trees.
17. Cultural heritage	High impact - Littleham Church is a grade II* listed building.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	<p>Yes.</p> <p>A cycle way and footpaths run through the site and development of the site has the potential to impact on the quality of healthy exercise and enjoyment of uninterrupted views in the EDNL.</p>
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	<p>No.</p> <p>There will be some impacts, but it should be possible to mitigate these through careful design and landscaping. The large scale of the site will enable layout options and mitigation measures which will secure a high quality scheme and reduce adverse impacts.</p>

³⁹ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

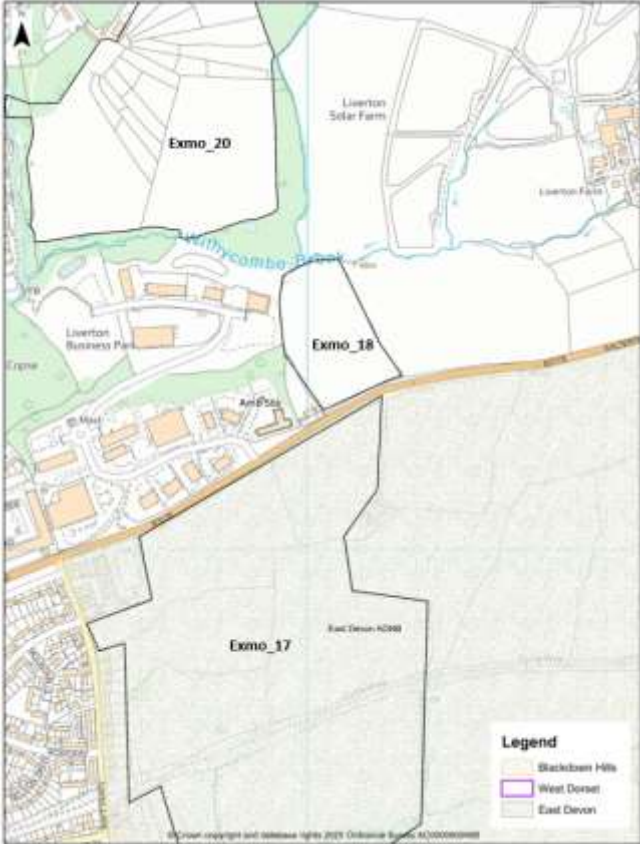

⁴⁰ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

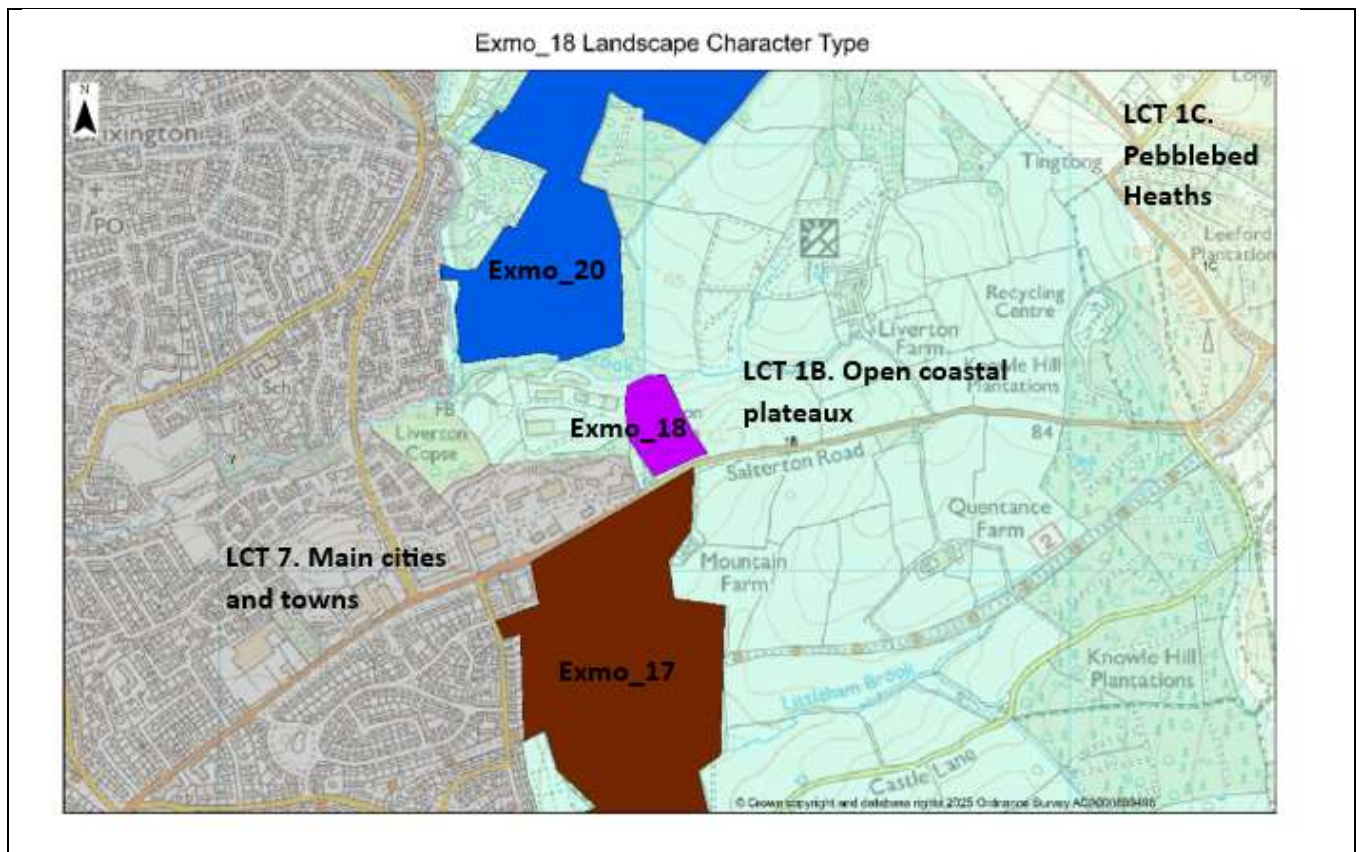
<p>20. Photos</p> <p>Site comprises fields between Littleham Church and Liverton business park. Viewed from the east it is seen against the built-up area with views across the Exe Estuary.</p> <p>View from south of site looking north.</p> <p>View of northern fields looking north to Salterton Road.</p>	  
<p>21. Would allocation constitute major on one criterion?</p>	<p>No, the scale of impacts identified is not considered great enough to constitute major development on any individual criteria.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>Yes.</p> <p>The combined impacts on coastal scenery, scenic quality, tranquillity, cultural heritage and recreational enjoyment of the EDNL mean that development of the site would constitute major development.</p>
<p>23. Major development?</p>	<p>Yes.</p>

12.2 Exceptional Circumstances Assessment Exmo_17

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Exmo_17
<p>Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?</p>	<p>Exmouth is the principal settlement in East Devon and the local plan strategy is to promote significant levels of development at the town. There are 10 sites proposed for allocation at Exmouth and the total number of dwellings proposed is around 1,455. This accounts for around 10.7 percent of the total number of homes to be delivered through allocations. This is generally in line with the spatial strategy, but could be considered low were it not for the considerable constraints to development around Exmouth. Many of the allocations have sensitivities that will require very careful design and mitigation.</p>
<p>Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?</p>	<p>None of the rejected sites were either within or adjacent to the EDNL. Sites were rejected due to significant heritage or biodiversity impacts, poor relationships with the urban area, access problems and conflicts with other policies.</p>
<p>Are there any cumulative impacts on the national landscape from other proposed allocations?</p>	<p>There are no other allocations or planning permissions in the EDNL around Exmouth.</p>
<p>What is the predicted landscape impact? Can any detrimental impacts be mitigated?</p>	<p>The landscape is sensitive to change. Detrimental impacts can be mitigated to some extent, but given the scale of development proposed there will be a significant change to the landscape.</p>
<p>What is the predicted environmental impact? Can any detrimental impacts be mitigated?</p>	<p>Ecological impacts are minimal, and no other environmental impacts are noted.</p>
<p>Are there any 'exceptional circumstances' that would justify development in the 'public interest'.</p>	<p>Yes The context of plan strategy directing larger scale growth to Exmouth, and the lack of suitable alternative sites outside of the EDNL constitute exceptional circumstances that justify the allocation.</p>

12.3 Major Development Assessment Exmo_18

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Exmo_18
3. Map	4. Aerial map
	




5. Nature of development ⁴¹	Employment.
6. Scale of development ⁴²	2.7 ha.
7. Setting	The site lies just to the north of the East Devon AONB, separated from it by the east-west running Salterton Road. There is, however, comparatively limited inter-visibility between the ANOB to the south and the site. In views from the north the site is more open and exposed, including from longer distance AONB views.
8. Coastal scenery ⁴³	Very limited impact. The land to the south of Salterton Road lies in the Coastal Preservation and there are some limited views of the coast from the road, but the relationship between the site and the coast is very limited.
9. Heathland commons	No impacts.
10. Elevated land	Very limited impact. The section of Salterton Road south of the site follows a small ridgeline from which the land falls away quite steeply on the site to the north. Whilst development to the south of the site would be on relatively


⁴¹. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁴² Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

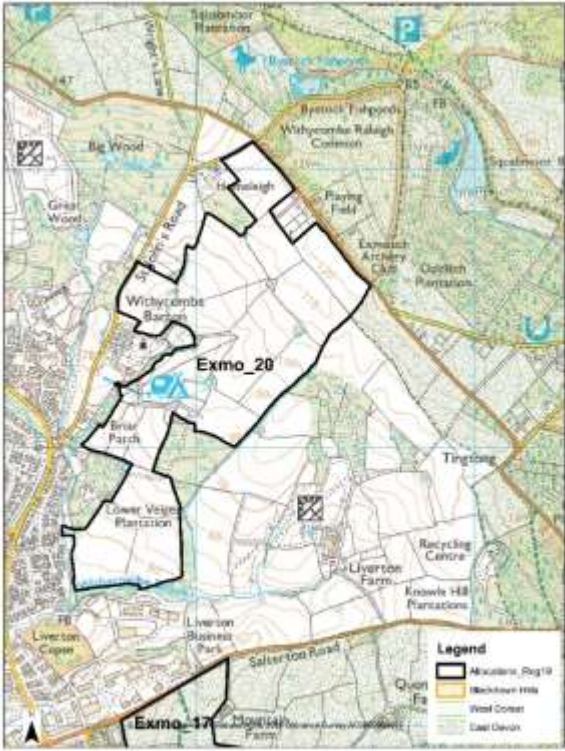

⁴³ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

	elevated land, this would be seen in the context of the existing business park to the west.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ⁴⁴	Landscape value is medium – an ordinary landscape which is appreciated by the community but has little or no wider recognition of its value.
13. Scenic quality	Medium impact – The sloping nature of the site that in places is visually open to longer distance views and boundary hedges provide some scenic qualities. However, this is reduced by the modern industrial buildings to its western boundary.
14. Relative wildness	Low impact - the site has low levels of wildness, being is part of a managed landscape at the edge of a large town.
15. Relative tranquillity	Low impact - the adjoining business park and traffic on the adjacent B3178 reduce levels of tranquillity
16. Natural heritage features	Medium impact – A small watercourse forms the southern site boundary and there is historical mapping evidence to show field boundaries and woodlands to adjacent areas area are long established.
17. Cultural heritage	Low impact - There are no designated heritage assets in close proximity of the site.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	No
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No
20. Photos Looking north from field gate to Salterton Road.	

⁴⁴ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

<p>Looking east from Liverton Business Park next to Howdens..</p>	
<p>21. Would allocation constitute major on one criterion?</p>	<p>No.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>No.</p>
<p>23. Major development?</p>	<p>No. The site lies outside of the East Devon National Landscape and has limited intervisibility with it.</p>

12.4 Major Development Assessment Exmo_20

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Exmo_20
3. Map	4. Aerial map
 <p>This is a topographic map of the Exmo_20 area. It shows various land parcels, some of which are outlined in black. The map includes labels for locations such as 'Witchcombe Barton', 'Lower Veale Plantation', and 'Liverton Farm'. A legend in the bottom right corner identifies different planning areas: 'Allocation' (black outline), 'Blackdown Hills' (yellow), 'West Dorset' (green), and 'East Devon' (light green). The map also shows roads, rivers, and other geographical features.</p>	 <p>This is an aerial photograph of the Exmo_20 area, overlaid with a black outline that matches the map on the left. The aerial view shows the terrain, fields, and buildings. A legend in the bottom right corner identifies the 'Allocation' area with a black outline. The map also shows the 'Blackdown Hills' and 'West Dorset' areas.</p>

Exmo_20 Landscape Character Type	
5. Nature of development ⁴⁵	<p>Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.</p> <p>Commercial/ mixed use –Office/warehouse/light industrial with associated parking.</p>
6. Scale of development ⁴⁶	<p>700 dwellings with at least 2 ha of employment use with supporting community and social uses.</p> <p>Exmouth has a population of 35,727, which equates to 17,094 homes. The percentage increase in the number of homes is around 4.0%.</p>
7. Setting	<p>The site is located on the edge of Exmouth and is wholly outside of the EDNL, but lies adjacent to it along the northeastern boundary. There is existing housing to part of the west and northeast of the site and a business park to the south. The whole of the west of the site adjoins open land.</p> <p>The site is very substantial in scale and sweeps generally upward from lower land at the south, where the site lies close to the built up urban edges of Exmouth, to higher more rural land to the north. Extensive wooded areas in southern parts of the site effectively screen large areas from obvious viewpoints but even for</p>


⁴⁵ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁴⁶ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

	<p>more exposed northerly parts close by viewpoints into the site are comparatively limited. There are no identified public footpaths into or through the site, so this limits more intimate local views and screening at site boundaries also limits local views. Longer distance viewpoints have not been assessed but given the site size it is assumed there are site areas of some prominence, perhaps mostly from southerly areas.</p> <p>Given its overall size the site is well screened with comparatively limited views in or out of the site on a local scale. More northerly parts of the site are however higher and more prominent and visually open.</p> <p>In the northeast of the site on the higher ground the site forms part the 1C. Pebblebed heaths Landscape Character Type (LCT). This LCT is an extra-ordinary landscape that is unique within Devon and has a strong sense of place, openness, vegetation and distinctive horizons.</p> <p>The majority of the site is in LCT 1 B. Open coastal plateaux. LCT 1B comprises the highest land along the coast and feels elevated, exposed and coastal, even when the sea isn't visible. Key characteristics visible on site are a relatively large scale landscape, with a regular medium to large field pattern, dense low hedges, containing mix of species and occasional hedgerow oaks. There is also a sense of openness, exposure and sense of place that comes from an open sky to the south and the relationship with the land to the north.</p>
8. Coastal scenery ⁴⁷	Low - medium impact – there is some intervisibility between the higher, most northern parts of the site that are close to the national landscape and the coast. However, the relationship is quite distant, and the site is not within the Coastal Protection Area.
9. Heathland commons	No direct impacts
10. Elevated land	Medium impact - the northern parts of the site are more elevated and lead onto the East Budleigh Common.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ⁴⁸	The landscape quality of the site is high.
13. Scenic quality	High impact - the intricate field pattern bounded by hedges with extensive areas of mature trees have a high scenic quality.
14. Relative wildness	Medium impact - the parts of the site adjacent to the EDNL feel remote from the nearby town.
15. Relative tranquillity	High impact - levels of tranquillity in the north of the site are high.

⁴⁷ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

⁴⁸ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

<p>16. Natural heritage features</p>	<p>High impact - the site has a number of areas of extensive woodland to and within southern and western boundaries. Most of the wooded areas have Unconfirmed County Wildlife Site status and a such will be of local wildlife importance.</p>
<p>17. Cultural heritage</p>	<p>High impact - there are a small number of heritage assets in and around the site. Of most importance is the Grade II Star St John in the Wilderness church. Any possible site development would need to fully take into account the setting, specifically including a sense of remoteness, of the church and the sensitivities associated with other assets. However, it is recognised that given the large site size there is scope to consider overall layouts and to potentially leave appropriate buffers undeveloped</p>
<p>18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?</p>	<p>No</p>
<p>19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?</p>	<p>No. This is a large site with capacity for around 1000 dwellings, although there are substantial environmental and heritage constraints that restrict the capacity of the site to around 700 homes. An indicative masterplan shows no built development, other than an access road, in the part of the site adjacent to the EDNL. Additionally, the Regulation 19 plan states that no housing will be permitted within 400 metres of the Pebblebed Heaths, which lie to the northeast (within the EDNL). This being the case, and subject to there being no other built development on this higher ground, the allocation is not considered to constitute major development in the context of the national landscape.</p>
<p>20. Photos</p> <p>Looking east across site from B3179 with Exe Estuary in the distance.</p> <p>Looking southwest across the site from St. John's Road.</p>	

21. Would allocation constitute major on one criterion?	No
22. Would allocation constitute major with any combination of criteria?	No
23. Major development?	No

13. Honiton Context and Summary

The Blackdown Hills National Landscape (BHNL) wraps around the northeast, east and southeast of Honiton. The East Devon National Landscape (EDNL) is located just to the south of the town and adjoins the BHNL.

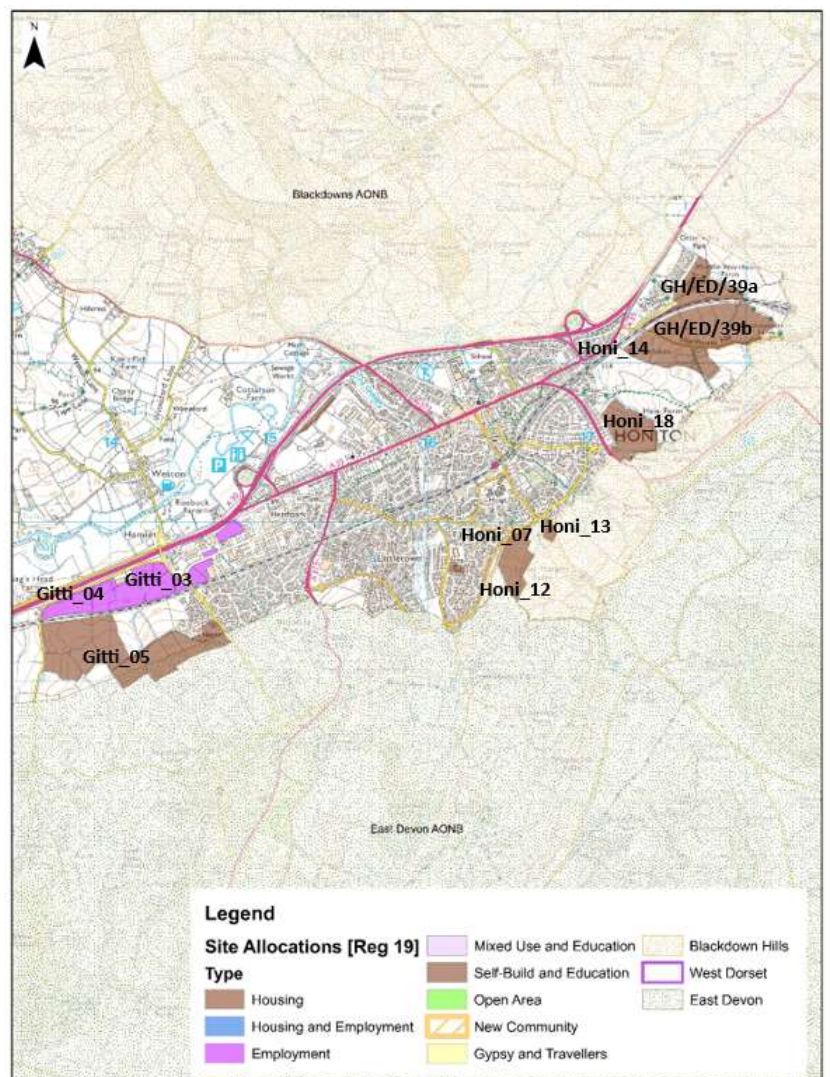
Honiton is one of the main centres in East Devon and the local plan strategy is to promote significant development here.

17 reasonably alternative sites were considered for potential housing or mixed use including allocations in the Regulation 19 local plan (as set out in the sustainability appraisal). 12 sites are included as housing/mixed use allocations. Five sites were rejected for a variety of reasons, including landscape impact, flooding and impact on heritage assets and biodiversity .

The allocations have a yield of some 838 dwellings plus 203 from existing permissions. In addition around 18 hectares of employment land is allocated. This is a level of growth that is compatible with the local plan strategy.

There are three proposed allocations at Honiton in the BHNL (Honi_07, Honi_12 and Honi_13). These sites are clustered together to the south of the town. Honi_07 and Honi_12 are adjoining fields and have been assessed as one to take account of the cumulative impact on the NL, which is considered to constitute major development for which there are exceptional circumstances. Honi_13 is partly developed and is not considered to be major development in the NL.

A small part of site Gitti_05 is in the EDNL and development of the remaining part of the site has the potential to affect the NL. The allocation is is not considered to be major development in the NL.



Two sites to the east of Honiton are adjacent to the BHNL (Honi_18 and GH/ED/39b). Honi_18 is considered to constitute major development in the context of the national landscape for which there are exceptional circumstances. GH/ED/39b is not considered to constitute major development.

No other sites in Honiton are considered to have potential impacts on the NL that require a major development assessment for local plan allocation.

13.1 Major Development Assessment for Honi_07 and Honi_12

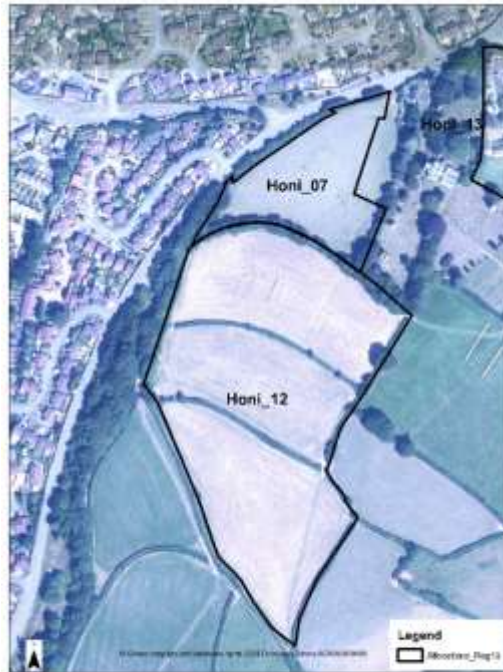
These sites are within the BHNL and adjoin the EDNL so could have an impact on the character of both NL's. This assessment therefore considers the criteria set for both NL's.

Form 1 and 2 combined: Assessment of Major Development in the East Devon and Blackdown Hills National Landscape

Criteria	Assessment
1. Protected Landscape	Within Blackdown Hills and adjacent to East Devon
2. Reference	Honi_07 and Honi_12

3. Map

4. Aerial map



Honi_07, Honi_12 and Honi_13 Landscape Character Type	
5. Nature of development ⁴⁹	Housing – predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ⁵⁰	101 dwellings. Honiiton has a population of around 11,549, which equates to 5,525 homes. The percentage increase in the number of homes would be around 1.8%.
7. Setting	The site is located on the edge of Honiton and forms four fields largely enclosed by mature hedges and trees. Landscape Character Type 3A. Upper farmed and wooded valley slopes.
8. Isolation ⁵¹	Parts of the site adjoin the town, but the visual separation provided by a belt of trees along the western boundary permits quite a strong sense of isolation in parts of the site, notwithstanding the close proximity of housing and a busy road.
9. Landscape Pattern	Honi_07 comprises a flat field with housing on opposite side of main road to the north, which is at a lower level. Honi_12 comprises three quite small fields. The site as a whole comprises quite an intricate pattern of fields on rising

⁴⁹ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁵⁰ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

⁵¹ Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) 'The Special Landscape Character'

	ground to the edge of the town. The field pattern of the site and the nearby fields is unchanged since the 1880-1890 map.
10. Geology	No distinctive features.
11. Architecture	There is little vernacular character in the nearby housing, but the Church of St Michael, a grade II* listed building, is a landmark feature, with its tower on higher land than the urban area to the north.
12. Coastal scenery ⁵²	No impact
13. Heathland commons	No impact
14. Elevated land	This criterion relates to the EDNL, which adjoins part of the southern boundary of the site and is in the same LCT (3A Upper farmed and wooded valley slopes). The site is elevated from the neighbouring housing, but existing boundary hedgerows limit the impacts and wider views from lower ground. However, the site is visible from higher ground to the south and is on noticeably higher ground than the town.
15. Agricultural valley bottoms	No impact.
16. Landscape quality ⁵³	The site assessment found the site to have a medium high landscape sensitivity.
17. Scenic quality	The site has scenic qualities that include its open agricultural use on elevated land from the adjoining road and mature boundary vegetation.
18. Relative wildness	The site has low levels of wildness, being part of a managed landscape on the edge of the town.
19. Relative tranquillity	Despite the adjoining town and busy road, the site does have a sense of tranquillity, particularly in the more southern fields.
20. Natural heritage features	There are mature trees and hedges to the site boundaries that could be retained.
21. Cultural heritage	The site adjoins the grounds of the Church of St Michael, grade 2* listed building. The site is close to the church and visible from the asset, although views are not open due to the presence of intervening hedgerows and trees.
18. Would any of the special qualities summarised in the Blackdown Hills management plan or the East Devon management plan be affected by the	Yes In terms of the BHNL, there is a sense of isolation in part of the site and the site is located on elevated land adjoining the EDNL.



⁵² Criteria 12, 13, 14 and 15 are taken from the special qualities outlined in section 0.6 of the management plan

⁵³ Criteria 16, 17, 18, 19, 20 and 21 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

<p>proposed development?⁵⁴</p>	
<p>19. Is there a significant adverse impact on the purposes for which the area has been designated or defined⁵⁵?</p>	<p>No</p>
<p>20. Photos</p>	<div data-bbox="491 573 1321 999" data-label="Image"> </div> <p data-bbox="507 1012 1198 1048">Honi_07 from the north ((field gate to Waterleat Avenue)</p> <div data-bbox="491 1061 1295 1509" data-label="Image"> </div> <p data-bbox="501 1541 1082 1576">Honi_12 looking southwest across 'middle' field.</p> <div data-bbox="491 1590 1350 1886" data-label="Image"> </div> <p data-bbox="501 1912 951 1948">View from Stoney Lane looking north</p>

⁵⁴ See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf](#) ([blackdownhillsaonb.org.uk](#))

⁵⁵ Blackdown Hills [Management](#) Plan and extract of page 19 in Appendix 2

	 <p>Honi_12 from the north (Higher Brand Lane)</p>  <p>Honi_12 from the north (Higher Brand Lane)</p>
<p>21. Would allocation constitute major on any one criterion?</p>	<p>No.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>Yes, impacts on elevated land, tranquillity, scenic and landscape quality.</p>
<p>23. Major development?</p>	<p>Yes</p>


13.2 Exceptional Circumstances Assessment Honi_07 and Honi_12

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Honi_07 and Honi_12
<p>Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?</p>	<p>Honiton is one of the main centres of East Devon and the plan strategy is to deliver significant levels of growth in the town. The allocations have a yield of some 838 dwellings plus 203 from existing permissions. This represents around a 19% increase in the number of homes in the town. In addition, around 18 hectares of employment land is allocated. This level of growth is compatible with the local plan strategy.</p>
<p>Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?</p>	<p>Most of the reasonable alternatives for Honiton are allocated in the plan. In terms of the rejected sites:</p> <ul style="list-style-type: none"> • Honi_04 and Honi_15 are on rising land in the EDNL and were rejected due to significant adverse landscape impacts. • Honi_09 is in the BHNL and was rejected due to significant adverse landscape impacts. • The combined yield of rejected sites in a NL was 239. These sites would have a greater impact on the national landscapes than the allocated sites. • The other two rejected sites were both within the urban area (Honi_05 and Honi_08). Development of these sites would result in less harm to the NL, but were rejected on flooding, biodiversity and heritage impacts.
<p>Are there any cumulative impacts on the national landscape from other proposed allocations?</p>	<p>No – the other allocations around Honiton in the NL are Honi_13 and Gitti_05. Honi_13 is close to Honi_07 and Honi_12, but the landscape impacts are limited by the existing development on the site. Gitti_05 is partly within the EDNL and is around 1800 metres from Honi_12 so that any cumulative impacts are limited.</p>

<p>What is the predicted landscape impact? Can any detrimental impacts be mitigated?</p>	<p>The site has a medium high landscape sensitivity. Development here will extend the urban area on to higher ground above the level of the existing housing to the north of the site. Detrimental impacts can be mitigated to some extent, but given the scale of development proposed there will be a significant change to the landscape.</p>
<p>What is the predicted environmental impact? Can any detrimental impacts be mitigated?</p>	<p>The site is within 100m of a Section 41 (S41) Habitat of Principle Importance. A minor adverse effect is predicted (not significant) and any detrimental impacts could be mitigated.</p>
<p>Are there any 'exceptional circumstances' that would justify development in the 'public interest'.</p>	<p>Yes The context of plan strategy directing larger scale growth to Honiton, and the lack of suitable alternative sites outside of the BHNL or EDNL constitute exceptional circumstances that justify the allocation.</p>

13.3 Major Development Assessment for Honi_13

Form 2: Assessment of Major Development in the Blackdown National Landscape	
Criteria	Assessment
1. Protected Landscape	Blackdown Hills
2. Reference	Honi_13
3. Map	4. Aerial map

12. Landscape quality ⁵⁹	The landscape quality of the site is unremarkable.
13. Scenic quality	The site has no scenic qualities.
14. Relative wildness	The site has low levels of wildness, being part of a managed and suburban landscape.
15. Relative tranquillity	The existing use and proximity of busy roads limit levels of tranquillity.
16. Natural heritage features	There are mature trees and hedges to the site boundaries that could be retained.
17. Cultural heritage	The site adjoins the grounds of the Church of St Michael, grade 2* listed building. The site is close to the church and visible from the asset, although views are not open due to the presence of intervening hedgerows and trees.
18. Would any of the special qualities summarised in the Blackdown Hills management plan be affected by the proposed development? ⁶⁰	No.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined ⁶¹ ?	No
20. Photos Existing housing on site	
21. Would allocation constitute major on any one criterion?	No.



⁵⁹ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

⁶⁰ See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf](#) (blackdownhillsaonb.org.uk)

⁶¹ Blackdown Hills [Management](#) Plan and extract of page 19 in Appendix 2

22. Would allocation constitute major with any combination of criteria?	None of the criteria indicate that the allocation constitutes major development.
23. Major development?	No.

13.4 Major Development Assessment for Honi_18

Form 2: Assessment of Major Development in the Blackdown Hills National Landscape	
Criteria	Assessment
1. Protected Landscape	Blackdown Hills
2. Reference	Insert Reference
3. Map	4. Aerial map
	

Honi_18 Landscape Character Type	
5. Nature of development ⁶²	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ⁶³	136 dwellings Honiiton has a population of around 11,549, which equates to 5,525 homes. The percentage increase in the number of homes would be around 2.5%
7. Setting	The site is located adjacent to the Blackdown Hills National Landscape, affording expansive views from nearby roads. The site has a gentle slope, rising from northwest to east and becoming relatively flat in the eastern and southern sections.
8. Isolation ⁶⁴	Low impact – site adjoins a trunk road and the town.
9. Landscape Pattern	Medium impact – the site forms part of the upper farmed valley slopes and is seen in relation to the hills that surround this part of Honiton. Development of the site would extend the urban area further along the valley and, to the extreme south of the site, to a higher elevation than the main town.

⁶² Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁶³ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant



⁶⁴ Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) 'The Special Landscape Character'

10. Geology	No impacts.
11. Architecture	Low impact – whilst there is a listed building opposite the proposed access, the local architecture is largely suburban.
12. Landscape quality ⁶⁵	High impact - due to its proximity to the designated landscape, the site has a moderate-to high landscape sensitivity, meaning any development would likely have a noticeable impact on the visual character of the area.
13. Scenic quality	High impact – the scenic qualities of the site make a positive contribution to the adjoining national landscape.
14. Relative wildness	Low impact – the site has low levels of wildness, being part of a managed landscape on the edge of the town.
15. Relative tranquillity	Low impact – levels of tranquillity are undermined by noise from the trunk road and proximity to the town.
16. Natural heritage features	Medium impact - The site is primarily covered by unimproved grassland, with vegetation lining the site boundary. Mature trees are located along the northern boundary adjacent to the brook, while trees and hedges are found on the eastern side of the site
17. Cultural heritage	Low impact.
18. Would any of the special qualities summarised in the Blackdown Hills management plan be affected by the proposed development? ⁶⁶	Yes – the landscape and scenic setting of the NL would be affected.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined ⁶⁷ ?	No

⁶⁵ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

⁶⁶ See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf](#) (blackdownhillsaonb.org.uk)

⁶⁷ Blackdown Hills [Management](#) Plan and extract of page 19 in Appendix 2

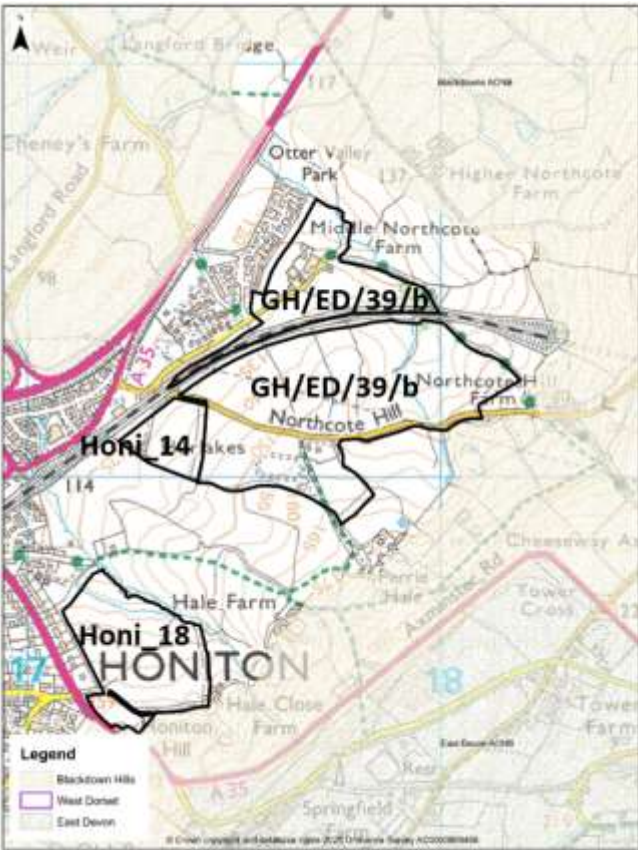
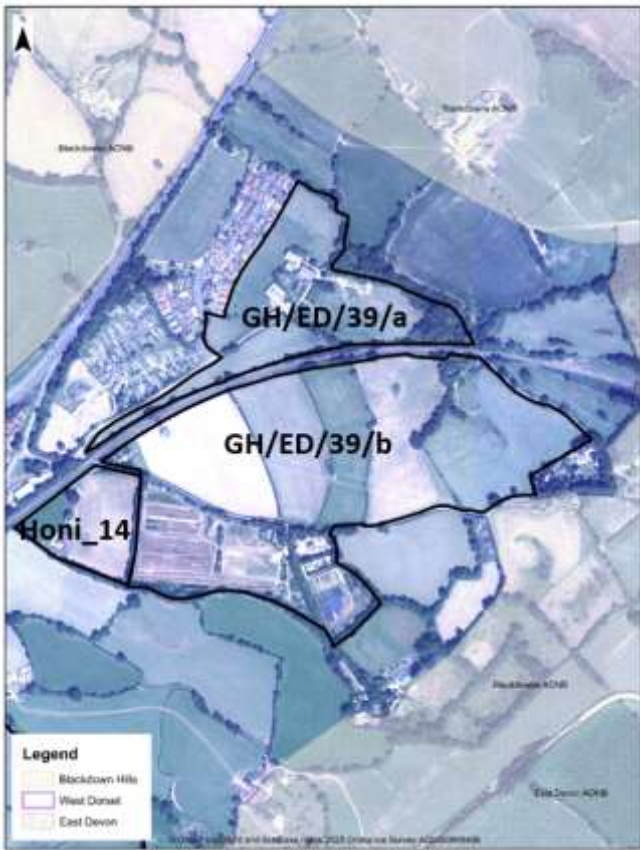
<p>20. Photos</p>	 <p>Looking south over southern part of site with Kings Road behind hedge to right of photo. The house is just inside the BHNL.</p>  <p>Looking east along access to Hale Close Farm with site to left of shot and BHNL to right of access.</p>
<p>21. Would allocation constitute major on any one criterion?</p>	<p>No.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>Yes – criteria 12 and 13 – landscape and scenic quality.</p>
<p>23. Major development?</p>	<p>Yes.</p>

13.5 Exceptional Circumstances Assessment Honi_18

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Honi_18
<p>Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?</p>	<p>Honiton is one of the main centres of East Devon and the plan strategy is to deliver significant levels of growth in the town. The allocations have a yield of some 838 dwellings plus 203 from existing permissions. This represents around a 19% increase in the number of homes in the town. In addition, around 18 hectares of employment land is allocated. This level of growth is compatible with the local plan strategy.</p>
<p>Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?</p>	<p>Most of the reasonable alternatives for Honiton are allocated in the plan. In terms of the rejected sites:</p> <ul style="list-style-type: none"> • Honi_04 and Honit_15 are on rising land in the EDNL and were rejected due to significant adverse landscape impacts. • Honi_09 is in the BHNL and was rejected due to significant adverse landscape impacts. • The combined yield of rejected sites in a NL was 239. These sites would have a greater impact on the national landscapes than the allocated sites. • The other two rejected sites were both within the urban area (Honi_05 and Honi_08). Development of these sites would result in less harm to the NL, but were rejected on flooding, biodiversity and heritage impacts.
<p>Are there any cumulative impacts on the national landscape from other proposed allocations?</p>	<p>No – there are other allocations around Honiton that are in the NL, but the nearest of these (Honi_13) is around 570 metres from Honi_15 so that any cumulative impacts are limited.</p>
<p>What is the predicted landscape impact? Can any detrimental impacts be mitigated?</p>	<p>The site has a medium high sensitivity to landscape change and development will alter the character of the area. Detrimental impacts can be mitigated by</p>

	restricting built development on higher ground to the south of the site.
<p>What is the predicted environmental impact? Can any detrimental impacts be mitigated?</p>	<p>The site is primarily covered by unimproved grassland, with vegetation lining the site boundary. Mature trees are located along the northern boundary adjacent to the brook, while trees and hedges are found on the eastern side of the site, outside the holiday cottages. Evidence of animal grazing was observed in the central and southern portions of the site during the site visit. Minor adverse effect predicted (not significant)</p>
<p>Are there any 'exceptional circumstances' that would justify development in the 'public interest'.</p>	<p>Yes The context of plan strategy directing larger scale growth to Honiton, and the lack of suitable alternative sites outside of the BHNL or EDNL constitute exceptional circumstances that justify the allocation.</p>

13.6 Major Development Assessment for GH/ED/39b

Form 2: Assessment of Major Development in the Blackdown Hills National Landscape	
Criteria	Assessment
1. Protected Landscape	Blackdown Hills
2. Reference	GHED/39b
3. Map	4. Aerial map
	

GH/ED/39b Landscape Character Type	
5. Nature of development ⁶⁸	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ⁶⁹	100 dwellings Honiton has a population of around 11,549, which equates to 5,525 homes. The percentage increase in the number of homes would be around 1.8%.
7. Setting	The site is outside but adjoins the Blackdown Hills National Landscape, which wraps around the eastern end of Honiton and is in close proximity to the East Devon National Landscape which starts further up Tower Hill. The site lies on lower ground than the nearby national landscapes and is in landscape character type 3A – Upper farmed and wooded valley slopes.
8. Isolation ⁷⁰	Low impact – The visual relationship with the town is minimal from most of the site, but overhead high voltage power lines and noise from two trunk roads diminish any sense of isolation.

⁶⁸ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁶⁹ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a ‘significant’ increase likely to be regarded as ‘major’ development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant



⁷⁰ Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) ‘The Special Landscape Character’

9. Landscape Pattern	To the north of Northcote Hill, the site comprises a series of fields sloping away to the north and separated by hedges that run from north to south between the road and the railway line. To the south of Northcote Hill and on higher ground are a group of buildings related to the plan nursery, which occupies the remainder of this part of the site.
10. Geology	No impacts.
11. Architecture	No impacts.
12. Landscape quality ⁷¹	Medium – the site forms rising land and can be seen from some vantage points in the context of the nearby national landscapes, and so has a medium high sensitivity to change, but landscape quality is eroded by the overhead power lines.
13. Scenic quality	Medium impact – the site has some scenic qualities, but they are eroded by the overhead power lines.
14. Relative wildness	Low impact – the site is part of the managed landscape with some horticultural use and buildings.
15. Relative tranquillity	Low impact – levels of tranquillity are reduced by overhead power lines and nearby roads.
16. Natural heritage features	Medium impact – there are hedges, trees and a small watercourse within the site.
17. Cultural heritage	Low impact.
18. Would any of the special qualities summarised in the Blackdown Hills management plan be affected by the proposed development? ⁷²	No.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined ⁷³ ?	No

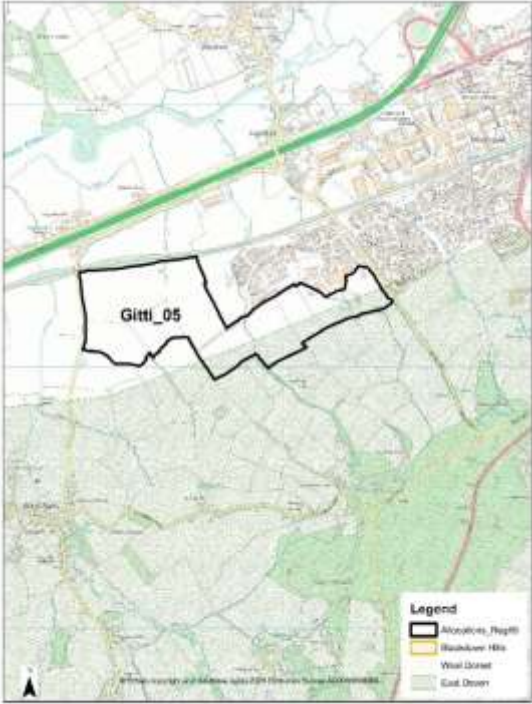

⁷¹ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

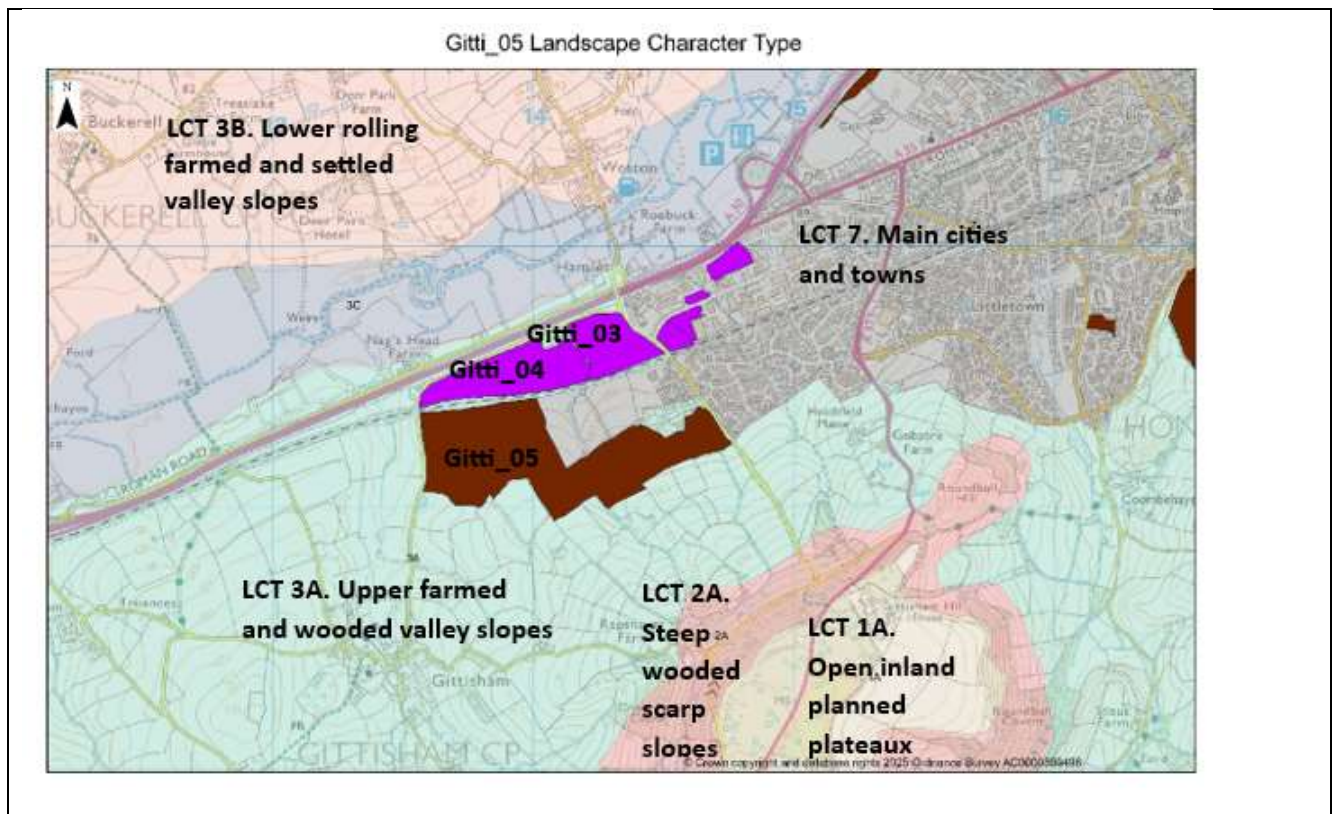
⁷² See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf](#) (blackdownhillsaonb.org.uk)

⁷³ Blackdown Hills [Management Plan](#) and extract of page 19 in Appendix 2

<p>20. Photos</p>	 <p>Looking northeast from Northcote Hill at western end of the site.</p>  <p>Looking southeast from Northcote Hill at western end of the site.</p>
<p>21. Would allocation constitute major on any one criterion?</p>	<p>No</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>No.</p>
<p>23. Major development?</p>	<p>No. The site is not within the national landscape and impacts on the national landscape would be minimal and capable of mitigation.</p>

13.7 Major Development Assessment for Gitti_05

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Gitti_05
3. Map	4. Aerial map
<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p>This map shows the Gitti_05 area with various land use designations. A legend in the bottom right corner includes: Allocation_Pag19 (black outline), Washdown Hills (yellow), Visual Corridor (green), and East Devon (grey). The Gitti_05 area is outlined in black.</p> </div> <div style="text-align: center;">  <p>This aerial map shows the Gitti_05 area with a black outline. A legend in the bottom right corner includes: Allocation_Pag19 (black outline). The map shows a mix of green fields, blue water bodies, and grey buildings.</p> </div> </div>	



5. Nature of development ⁷⁴	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ⁷⁵	310 dwellings. Honiton has a population of around 11,549, which equates to 5,525 homes. The percentage increase in the number of homes would be around 5.6%.
7. Setting	The site comprises a series of fields that slope up to the south in the southeastern part of the site into the EDNL, which includes the southernmost part of the site. There is a recently constructed housing estate to the north of this part of the site and an area of slightly older housing to the east. Landscape Character Type (LCT) 3A. Upper farmed and wooded valley slopes.
8. Coastal scenery ⁷⁶	No impacts.
9. Heathland commons	No impacts



⁷⁴ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁷⁵ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

⁷⁶ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

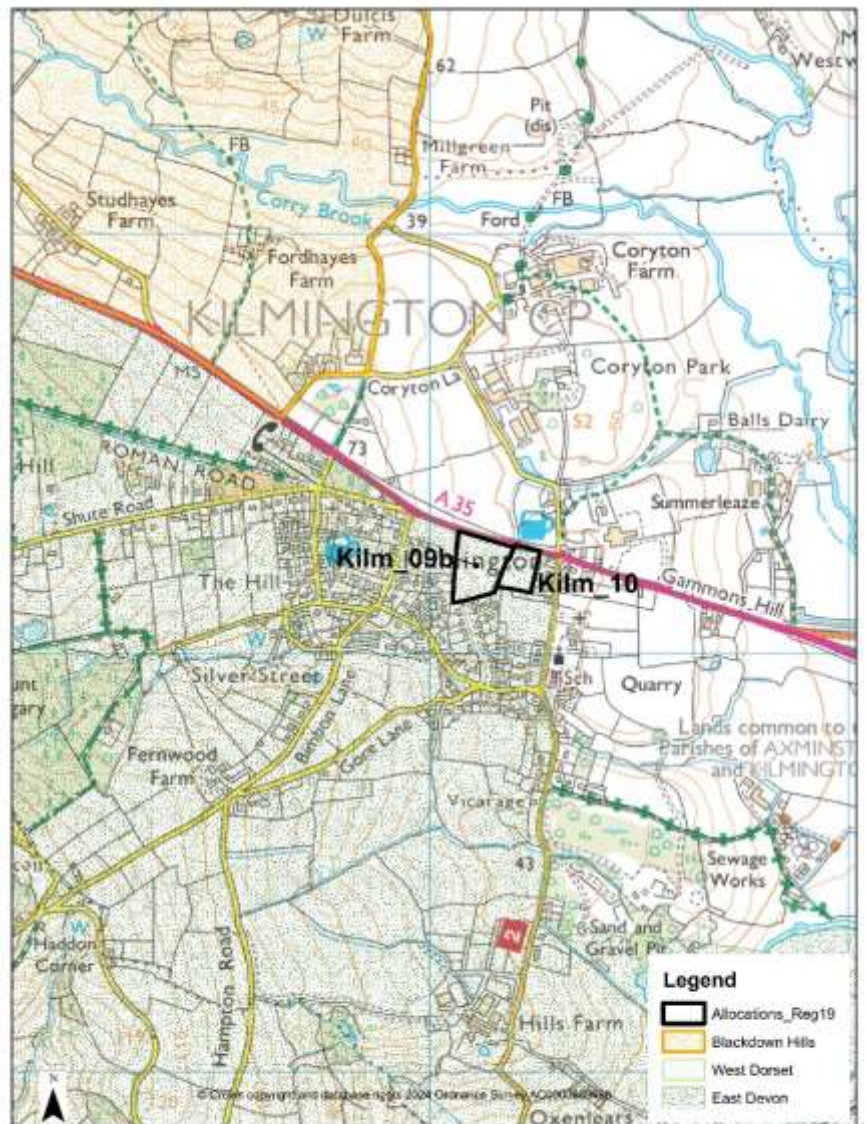
10. Elevated land	Low impact – the site is towards the bottom of the valley and does not have a strong relationship with the nearby hills.
11. Agricultural valley bottoms	Low impact – the existing settlement pattern is that the built-up area extends along the valley bottom and development of the site would continue this feature.
12. Landscape quality ⁷⁷	Medium – part of the site is within the EDNL and has a medium high sensitivity to change, but overall, the landscape quality is medium.
13. Scenic quality	Medium impact – parts of the site have an attractive rural character and scenic quality gained from a sloping landform, a watercourse and hedgerows/fields.
14. Relative wildness	The site has low levels of wildness, being part of a managed landscape at the edge of a town.
15. Relative tranquillity	Medium impact - parts of the site have a sense of tranquillity, although this is undermined by the proximity of the town.
16. Natural heritage features	Medium impact – hedges, trees and watercourse.
17. Cultural heritage	Medium impact – the western edge of the site is close to the historic village of Gittisham, which is in the EDNL.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	No.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No Policy SD03 of the Regulation 19 local plan (Honiton and its development allocations) states that “Southern parts of the site are in the East Devon National Landscape and this area will require very careful design to take account of its landscape setting. On the western edges the site is close to the historic village of Gittisham and particular sensitivity will need to be attached to preventing adverse heritage impacts. These southerly and westerly parts will be best suited for open space uses”. This being the case, the allocation is not considered to constitute major development in the context of the national landscape.

⁷⁷ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation



<p>20. Photos</p>	 <p>Looking northwest from Hayne Lane at eastern end of the site.</p>  <p>Looking east from lane to Gittisham to west of the site.</p>
<p>21. Would allocation constitute major on one criterion?</p>	<p>No</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>No.</p>
<p>23. Major development?</p>	<p>No.</p>

14 Kilmington

Kilmington is a village located within the East Devon National Landscape (EDNL). Two sites are proposed for housing, Kilm_09 and Kilm_10, and these are located together. Given the cumulative impact on the NL, they have been assessed together and are not considered to constitute major development in the context of the national landscape.



14.4 Major Development Assessment for Kilm_09b and Kilm_10


Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Kilm_09b and Kilm_10
3. Map	4. Aerial map
<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  </div> <div style="text-align: center;">  </div> </div>	

Kilm_09 and Kilm_10 Landscape Character Type	
5. Nature of development ⁷⁸	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ⁷⁹	28 dwellings. Kilmington has a population of around 928, which equates to 450 homes. The percentage increase in the number of homes would be around 6.2%.
7. Setting	The immediate context is the village edge with the A35 trunk road to the northern boundary and housing/commercial development to most other sides, except a recreational area to the southeast. Landscape Character Type (LCT) 3B. Lower rolling farmed and settled valley slopes.
8. Coastal scenery ⁸⁰	No impacts.
9. Heathland commons	No impacts
10. Elevated land	No impacts.


⁷⁸ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁷⁹ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

⁸⁰ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

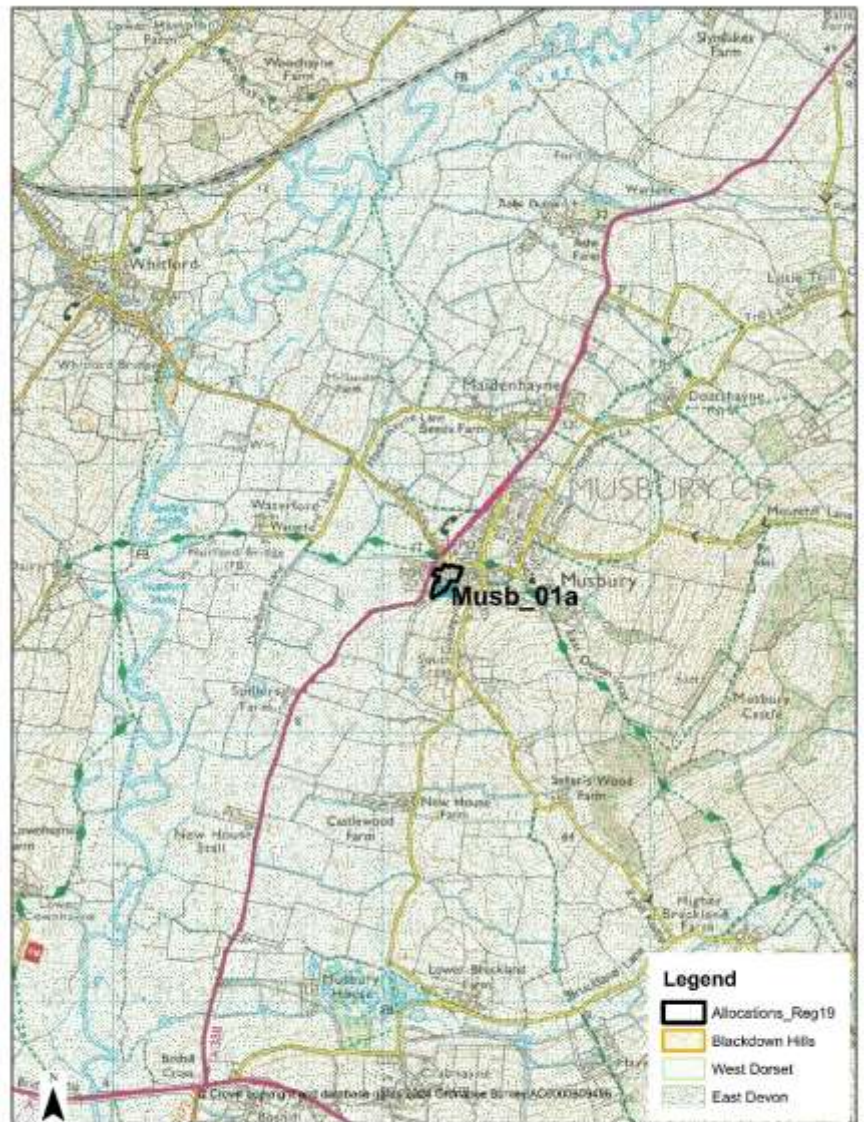
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ⁸¹	The site comprises two fields that are largely surrounded by development, with the A35 trunk road to the north.
13. Scenic quality	The site has some scenic quality from its open agricultural use and the boundary trees.
14. Relative wildness	The site has low levels of wildness, being set within the overall envelope of Kilmington.
15. Relative tranquillity	The adjoining uses and traffic on the very busy adjoining trunk road restrict levels of tranquillity.
16. Natural heritage features	The site is largely surrounded by mature trees, which should be retained.
17. Cultural heritage	There are several Grade II listed buildings in close proximity to the site, but the impact of development of the site on the setting of these could be successfully mitigated.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	No.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No
20. Photos Kilm_10 viewed from carpark	

⁸¹ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

<p>Kilm_09b from A35</p>		
<p>21. Would allocation constitute major on one criterion?</p>	<p>No.</p>	
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>No. None of the criteria indicate that the allocation constitutes major development.</p>	
<p>23. Major development?</p>	<p>No.</p>	

15 Musbury

Musbury is a village located within the East Devon National Landscape (EDNL). One site is proposed for housing, Musb_01a. The allocation is not considered to constitute major development in the context of the national landscape.



15.4 Major Development Assessment for Musb_01a

Form 1: Assessment of Major Development in the East Devon National Landscape

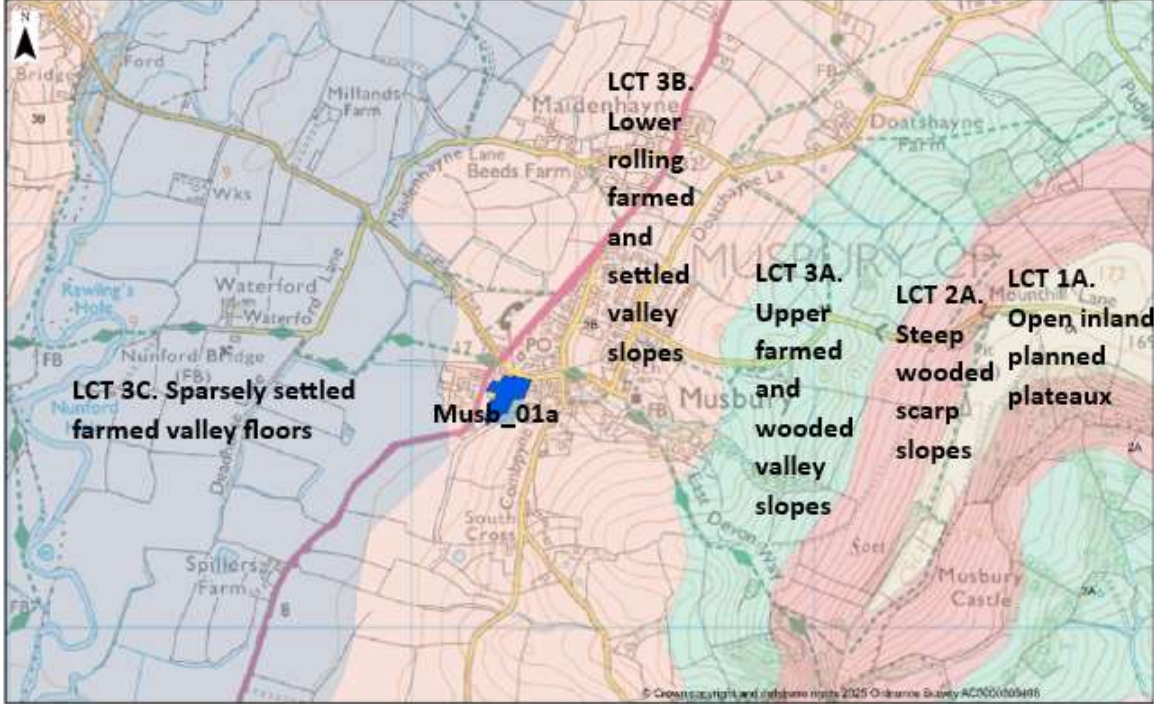
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Musb_01a

3. Map



4. Aerial map




Musb_01a Landscape Character Type	
	
5. Nature of development ⁸²	<p>Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.</p> <p>Commercial/ mixed use –Office/warehouse/light industrial with associated parking.</p>
6. Scale of development ⁸³	<p>15 dwellings plus 0.06 ha employment land.</p> <p>Musbury has a population of around 508, which equates to 243 homes. The percentage increase in the number of homes would be around 6%.</p>
7. Setting	<p>The immediate context is the village edge (with older housing in the conservation area to the north, housing on the higher ground to the east, a thatched cottage to the southwest with the larger village hall to the west and public house to the northwest). There is a large farm complex to the west on the other side of the busy A358.</p> <p>Landscape Character Type (LCT) 3B. Lower rolling farmed and settled valley slopes.</p>
8. Coastal scenery ⁸⁴	<p>No impacts.</p>

⁸² Criteria 5, 6 and 7 are taken from the footnote to the NPPF


⁸³ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

⁸⁴ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

9. Heathland commons	No impacts
10. Elevated land	No impacts.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ⁸⁵	The site comprises a former farmyard with a collection of agricultural buildings and areas of hardstanding. There is a small field that is largely surrounded by development.
13. Scenic quality	The site has little scenic quality.
14. Relative wildness	The site has low levels of wildness, being a largely developed site at the edge of a village.
15. Relative tranquillity	The adjoining housing and traffic on the adjacent A358 restrict levels of tranquillity.
16. Natural heritage features	None.
17. Cultural heritage	The site includes the locally listed farmhouse, which is in the conservation area, and some of the older farm buildings are heritage assets.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	No.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No
20. Photos Former farmhouse	

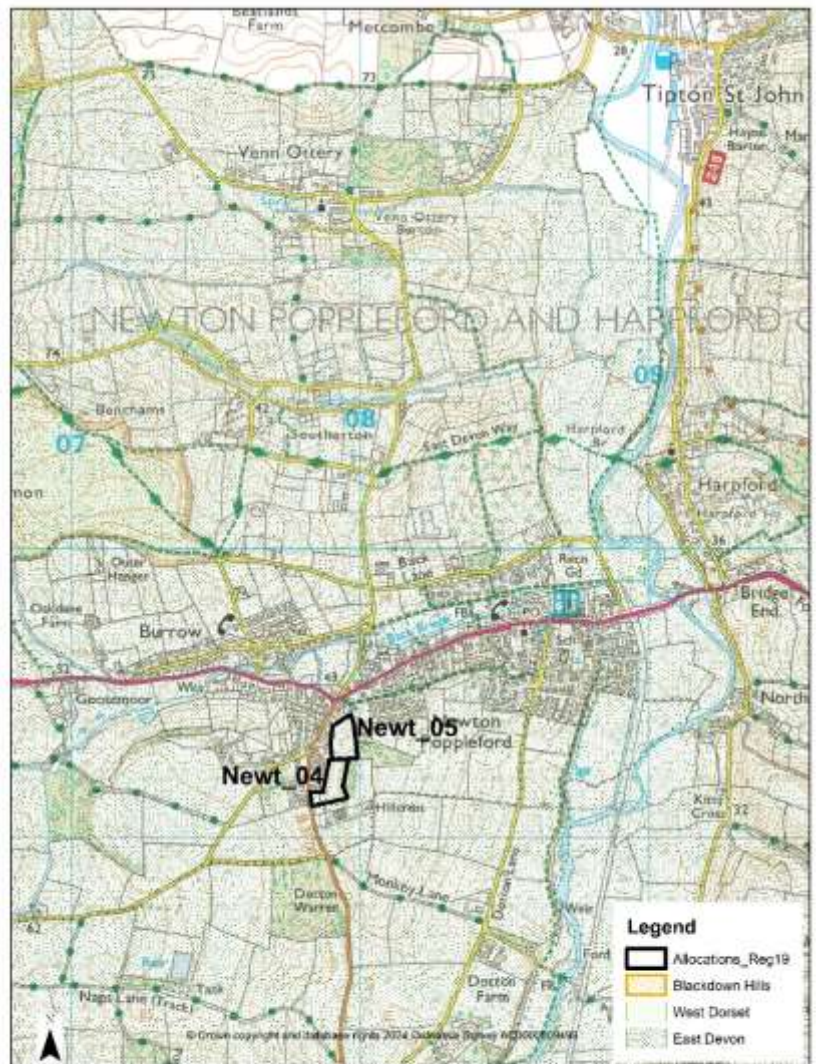
— Former agricultural buildings —

⁸⁵ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

	
21. Would allocation constitute major on one criterion?	No.
22. Would allocation constitute major with any combination of criteria?	No. None of the criteria indicate that the allocation constitutes major development.
23. Major development?	No.

16 Newton Poppleford

Newton Poppleford is a village located within the East Devon National Landscape (EDNL). Two sites are proposed for housing, Newt_04 and Newt_05 and these are located together. Given the cumulative impact on the NL, they have been assessed together and are considered to constitute major development in the context of the national landscape. This conclusion accords with an appeal decision relating to the combined site from 2014, where the Inspector found that “In the context of the village, and in the light of the scheme’s visibility from a main approach road” a 5% increase in the size of the village “is a significant addition. The requirements of paragraph 116 of the Framework therefore apply.” (APP/U1105/A/14/2211701).



The allocation is considered to constitute major development in the context of the national landscape which is justified by exceptional circumstances.

16.4 Major Development Assessment for Newt_04 and Newt_05


Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Newt_04 and Newt_05
3. Map	4. Aerial map

Newt_04 and Newt_05 Landscape Character Type	
5. Nature of development ⁸⁶	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ⁸⁷	55 dwellings (28 on Newt_04 and 27 on Newt_05) Newton Popleford has a population of around 1784 which equates to 853 homes. The percentage increase in the number of homes would be around 6.4%.
7. Setting	The site is located within the EDNL and is bounded by housing on two sides. It comprises two fields that slopes up gently from the west to a group of trees (outside the site) that form an attractive skyline feature. Housing along the western boundary partly shields the site from public view. Overall, there is a high susceptibility to landscape change. Landscape Character Type (LCT) 3B. Lower rolling farmed and settled valley slopes.
8. Coastal scenery ⁸⁸	No impacts.
9. Heathland commons	No impacts

⁸⁶. Criteria 5, 6 and 7 are taken from the footnote to the NPPF


⁸⁷ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

⁸⁸ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

10. Elevated land	The site forms a rural foreground to a visually important wooded skyline. Distinctive, unspoilt, wooded skyline providing local distinctiveness and orientation are one of the special qualities of the EDNL and developing the more elevated parts of the site would have a detrimental impact on this character.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ⁸⁹	The site forms part of the distinctive setting of Newton Poppleford and has a high sensitivity to landscape change.
13. Scenic quality	The site has high scenic quality due to its landform, open appearance and relationship with the adjoining elevated woodland.
14. Relative wildness	The site has low levels of wildness, being part of a managed landscape adjoining the village.
15. Relative tranquillity	The adjoining housing and traffic on the nearby road restrict levels of tranquillity.
16. Natural heritage features	There are mature trees to the site boundaries.
17. Cultural heritage	No impact.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	Yes, as set out in 10.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No
20. Photos Site viewed from Exmouth Road.	

⁸⁹ Cri lands Site viewed from Beech Close.

17 are taken from Natural England [guidance](#) on meeting beauty criteria for national

	
<p>21. Would allocation constitute major on one criterion?</p>	<p>Yes – impact on special qualities of the EDNL.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>Yes, landscape quality and scenic quality in addition to special qualities.</p>
<p>23. Major development?</p>	<p>Yes.</p>

16.5 Exceptional Circumstances Assessment Newt_04 and Newt_05

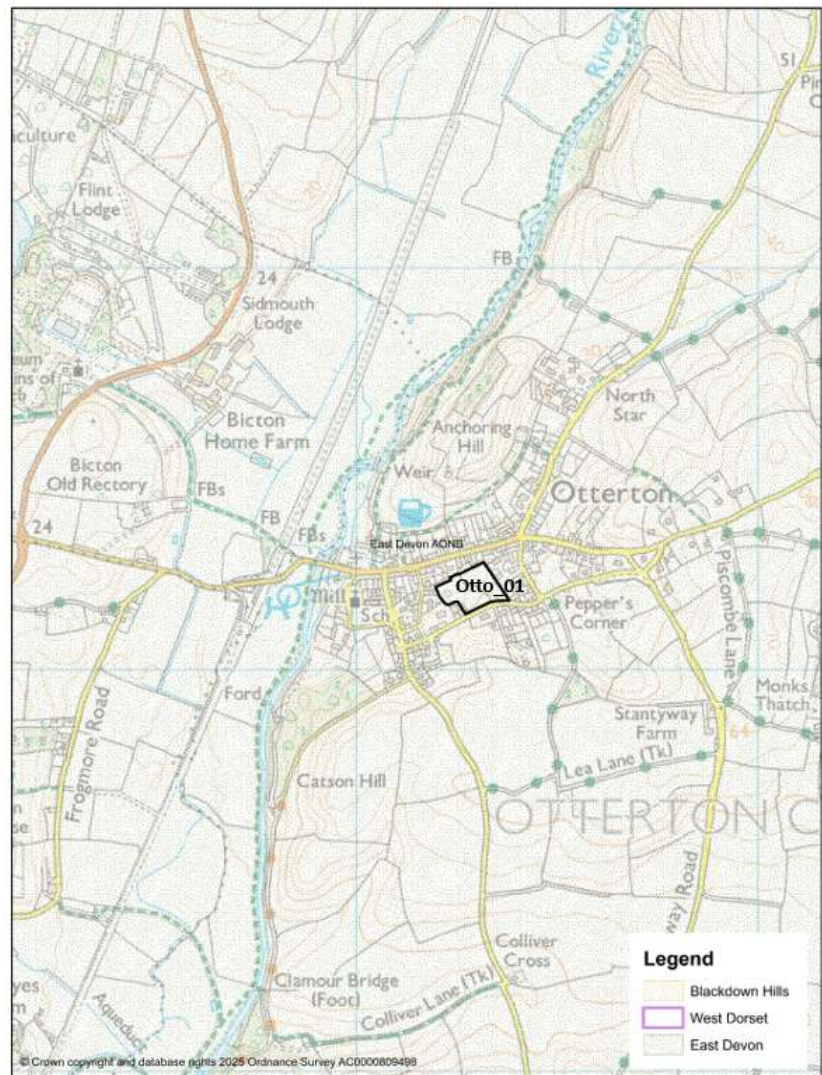
Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Newt_04 and Newt_05
Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?	Newton Poppleford is designated as a service village in Strategy Policy SP0 of the Regulation 19 Plan. Limited development is encouraged in service villages. The percentage increase in homes as a result of the allocation is around 6.4%. When existing permissions are taken into account the increase in houses rises to around 7.6%. This level of growth is compatible with the plan strategy.
Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?	Five sites in Newton Poppleford passed the site sifting process and were considered for housing allocations. Services and facilities are concentrated in the east of the village, but all the sites considered are to the west. Access to the village centre through active means of travel is heavily constrained by a 'pinch point' in the A.3052, which bisects the village and lacks separate footways. Initially all sites were considered to be unsuitable for allocation on this basis. However, while allocations for inclusion in the Regulation 19 plan were being considered, the promoters of Newt_05 advised that land had been acquired to provide an alternative, traffic free route to the north of the site. It was considered that this would overcome previous objections and that this would provide wider benefits that the alternative sites could not deliver. The traffic free route could also benefit the development of Newt_04, as the sites adjoin each other.
Are there any cumulative impacts on the national landscape from other proposed allocations?	No other allocations are proposed in Newton Poppleford.
What is the predicted landscape impact? Can any detrimental impacts be mitigated?	The landscape has a high sensitivity to change. The site forms a rural foreground to a visually important wooded skyline. Distinctive, unspoilt,

	<p>wooded skyline providing local distinctiveness and orientation are one of the special qualities of the EDNL and developing the more elevated parts of the site would have a detrimental impact on this character.</p>
<p>What is the predicted environmental impact? Can any detrimental impacts be mitigated?</p>	<p>The site is within the Pebblebed Heaths habitat mitigation zone and adjacent to a woodland nature recovery network. Significant moderate adverse impacts are predicted.</p>
<p>Are there any 'exceptional circumstances' that would justify development in the 'public interest'.</p>	<p>Yes. The scale of development is compatible with the local plan strategy and impacts on the national landscape and the environmental are capable of mitigation. Development of the site will result in improved footpath links to services and facilities in the village, which will benefit existing residents.</p>



17 Otterton

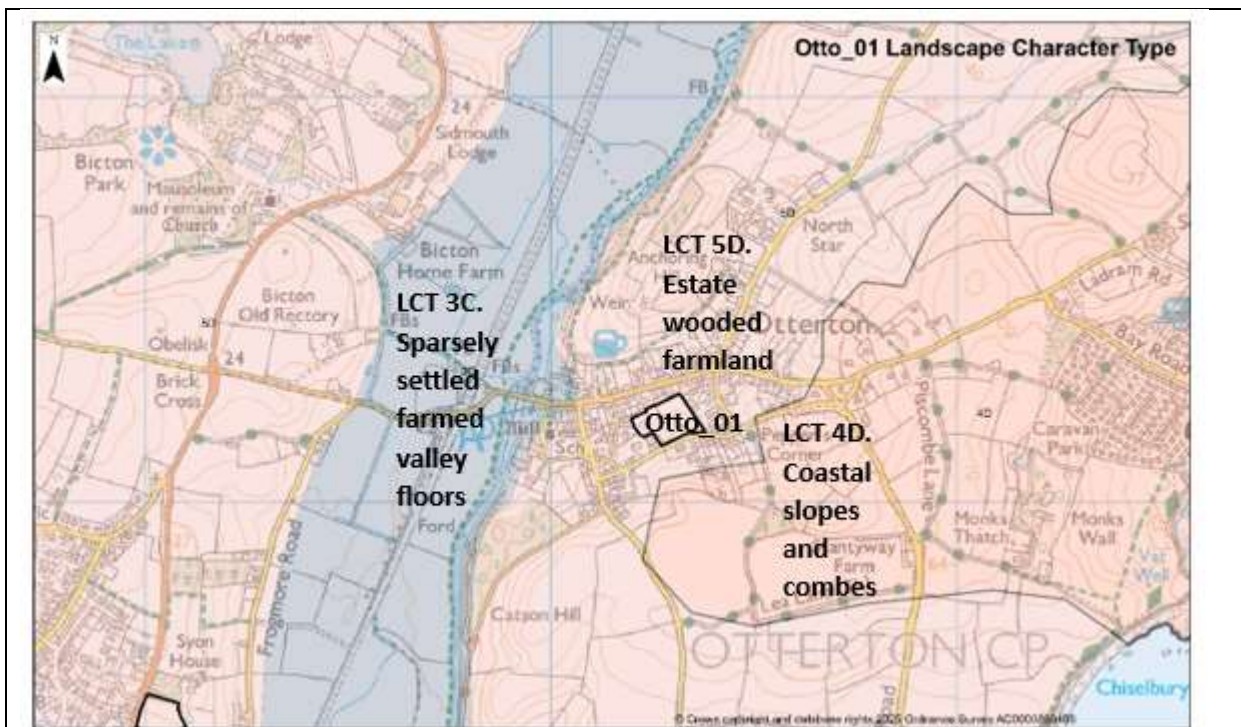
Otterton is a village located within the East Devon National Landscape (EDNL). One site is proposed for housing, Otto_01.

The allocation is considered to constitute major development in the context of the national landscape which is justified by exceptional circumstances.



17.4 Major Development Assessment for Otto_01

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Otto_01
3. Map	4. Aerial map
	



5. Nature of development ⁹⁰	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ⁹¹	10 dwellings. Otterton has a population of around 711, which equates to 340 homes. The percentage increase in the number of homes would be around 3%.
7. Setting	The site comprises two small fields divided by a mature hedgerow with trees on steeply sloping ground. The site is surrounded by housing. The village is located in a valley with quite steep sides so that the site is visible in views from the footpath on the other side of the valley. The site is close to the historic village core, which has many historic vernacular buildings. Landscape Character Type (LCT) 5D Estate wooded farmland.
8. Coastal scenery ⁹²	No impacts.
9. Heathland commons	No impacts
10. Elevated land	No impacts.

⁹⁰. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁹¹ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a ‘significant’ increase likely to be regarded as ‘major’ development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

⁹² Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

11. Agricultural valley bottoms	The site comprises two small fields close to the valley bottom, although on steeply sloping land.
12. Landscape quality ⁹³	The site makes a strong contribution to local landscape character through its steeply sloping landform and small scale, irregular field patterns. The landscape has a strong, intrinsic historic character, but with some modern human influence.
13. Scenic quality	Views of the site from the immediate area are limited by hedges and existing housing. However, there are clear views from the public footpath to the north of Otterton, to which the site makes a positive contribution., The 'green' and sloping nature of the site, adjacent to the historic core of the village is very visually distinctive.
14. Relative wildness	The site has low levels of wildness, being part of a managed landscape within a village setting.
15. Relative tranquillity	The landscape quality of the site is high, but the location within the village diminishes some of its rural character and tranquillity.
16. Natural heritage features	There is a group of mature trees forming a hedge line within the site.
17. Cultural heritage	Parts of the site help to provide an attractive 'rural' backdrop for a number of listed buildings along Fore Street.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	Yes. Development of the site also has the potential to impact on the setting of heritage assets and the scenic beauty and landscape quality.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No

⁹³ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

17.5 Exceptional Circumstances Assessment Otto_01

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Otto_01
Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?	Otterton is designated as a service village in Strategy Policy SP0 of the Regulation 19 Plan. Limited development is encouraged in service villages. The percentage increase in homes as a result of the allocation is around 3%. When existing permissions are taken into account the increase in houses rises to around 3.5%. This level of growth is a little low, but is compatible with the plan strategy.
Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?	Four sites were considered for housing allocations in Otterton. Two sites (Otto_02 and Otto_04) were not allocated because of significant flooding issues, although they have been included in the settlement boundary. Otto_03 is located on higher land than Otto_01 and was considered to be suitable for allocation due to detrimental landscape and heritage impacts.
Are there any cumulative impacts on the national landscape from other proposed allocations?	No other allocations are proposed in Otterton.
What is the predicted landscape impact? Can any detrimental impacts be mitigated?	The key characteristics and qualities of the landscape are highly susceptible to change from the development proposed due to the steeply sloping nature of the site, views into the site from the footpath north of Otterton and the relationship of the landscape to the neighbouring heritage assets. The northwestern part of the site is not considered to be suitable for development, but impacts from development on the remainder of the site can be mitigated.
What is the predicted environmental impact? Can any detrimental impacts be mitigated?	The site is around 42 metres from stream that runs alongside Fore Street and is within the Exe Estuary and Pebblebed Heaths Habitat Mitigation Zones. Significant moderate adverse effect predicted, but can be mitigated.

<p>Are there any 'exceptional circumstances' that would justify development in the 'public interest'.</p>	<p>Yes. The scale of development is compatible with the local plan strategy and impacts on the national landscape are capable of mitigation.</p>
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18.4 Major Development Assessment for Sidm_34

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Sidm_34
3. Map	4. Aerial map

Sidm_34 Landscape Character Type	
5. Nature of development ⁹⁴	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ⁹⁵	43 dwellings. Sidbury has a population of around 468, which equates to 224 homes. The percentage increase in the number of homes would be around 19.2%.
7. Setting	<p>The site is located at the edge of a housing estate on rising land that forms part of the wider landscape setting of the village. The housing elements form the lower part of three fields that partly adjoin the A375.</p> <p>The fields form a green gap between the main part of Sidbury and the smaller area of housing to the south. When viewed from the east these fields form a scenic foreground to Sidbury Castle, which is a Scheduled Ancient Monument. The lower parts of the fields are filtered in some views across the valley by mature trees and make less contribution to the setting of Sidbury Castle than the higher parts of the field.</p> <p>Landscape Character Type (LCT) 3B. Lower rolling farmed and settled valley slopes.</p>


⁹⁴. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁹⁵ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

8. Coastal scenery ⁹⁶	No impacts.
9. Heathland commons	No impacts
10. Elevated land	The hills flanking the Sid Valley form part of the ‘elevated fingers of land’ that are part of the special qualities of the EDNL. The site forms part of the lower foreground to views of the hills when viewed from the east, with the higher LCT 3A (Upper farmed and wooded valley slopes) on the higher ground west of the site.
11. Agricultural valley bottoms	The site forms part of the ‘intimate agricultural valleys’ referred to in the management plan in relation to the special qualities of the EDNL. However, the exiting development to the north of the site minimises any detrimental impact on this feature.
12. Landscape quality ⁹⁷	The site makes a positive contribution to local landscape character but in the context of the development to the north of the site this is of minimal significance to the wider landscape.
13. Scenic quality	The site has some rural character, but this is diminished by its location adjacent to the busy A376 and in the context of development to the north.
14. Relative wildness	The site has low levels of wildness, being part of a managed landscape at the edge of a village.
15. Relative tranquillity	The adjoining housing and traffic on the adjacent A376 restrict levels of tranquillity.
16. Natural heritage features	There are some trees to the site boundary.
17. Cultural heritage	There are listed buildings to the north and east of the site and the Sidbury Conservation Area also lies to the north. Development would need to be carefully designed to mitigate detrimental impacts on these heritage assets.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	Yes, as set out in 10 and 11.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No

⁹⁶ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

⁹⁷ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

<p>20. Photos</p> <p>Sidbury Castle. →</p> <p>Mature trees help to filter views of lower parts of the site from the east. →</p>	
<p>21. Would allocation constitute major on one criterion?</p>	<p>Yes, the scale of development would result in a 19.2% increase in housing numbers.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>Yes, landscape quality and scenic quality in addition to special qualities.</p>
<p>23. Major development?</p>	<p>Yes</p>

18.5 Exceptional Circumstances Assessment

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Sidm_34
Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?	Sidbury is designated as a service village in Strategy Policy SP01 of the Regulation 19 Plan. Limited development is encouraged in service villages. The percentage increase in homes as a result of the allocation is around 19.2%. When existing permissions are taken into account the increase in houses rises to around 19.6%. This level of growth is high for a service village, but Sidbury is within 1km of Sidmouth, which is one of the main centres in East Devon and provides an excellent range of services and facilities. The site is adjacent to a regular bus route between Honiton and Exeter via Sidmouth and development of the site will facilitate a pedestrian and cycle route to improve active travel opportunities between Sidmouth, Sidford and Sidbury.
Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?	Only one reasonable alternative was identified in Sidbury and the scale of development in nearby Sidmouth is below what would be compatible with a main centre.
Are there any cumulative impacts on the national landscape from other proposed allocations?	The allocations in Sidmouth at Sidm_06a is around 750 metres away and there could be cumulative impacts, but these are not considered to be significant.
What is the predicted landscape impact? Can any detrimental impacts be mitigated?	Short distance views into site from the A375 are limited due to topography and mature vegetation, but the site is clearly visible from elsewhere in the NL, for example from Buckley Road across the valley to the east. Overall, the site has a high-medium landscape sensitivity to new development.
What is the predicted environmental impact? Can any detrimental impacts be mitigated?	Arable fields surrounded and divided by mature hedgerows and trees. The site is 10m from an unconfirmed wildlife site, 31m from a nature recovery network area and

	<p>35m from a habitat of principle importance; it falls within both the Beer Quarry & Caves SAC bat consultation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, there is a significant moderate adverse effect predicted on ecology.</p>
<p>Are there any 'exceptional circumstances' that would justify development in the 'public interest'.</p>	<p>Yes. The scale of development is compatible with the local plan strategy and impacts on the national landscape are capable of mitigation. Development of the site will help to deliver a multi-use path trail (routes used by a combination of cyclists, pedestrians and by/for other movement), ensuring delivery of the entirety of the route from Sidford to Sidbury.</p>

19 Sidmouth

Sidmouth is almost surrounded by the East Devon National Landscape (EDNL) and parts of the built-up area are within the EDNL. Three allocations are proposed at Sidmouth that are in the EDNL: Sidm_01; Sidm_06a; Sidm_31.

All of the allocations are considered to constitute major development in the context of the national landscape which is justified by exceptional circumstances.



19.4 Major Development Assessment for Sidm_01

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Sidm_01
3. Map	4. Aerial map

Sidm_01 Landscape Character Type	
5. Nature of development ⁹⁸	Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.
6. Scale of development ⁹⁹	127 dwellings. Sidmouth has a population of around 13, 280 which equates to 6354 homes. The percentage increase in the number of homes would be around 2%.
7. Setting	The site comprises three relatively level fields on the edge of built-up area. There is housing on two sides with a small area of woodland to the north and a large field on rising ground to the west. When viewed from the road on the western side of the adjacent field the site is set against the backdrop of housing on rising land to the east, which is largely within the EDNL. The housing to the south of the site is outside of the EDNL. When viewed from the east the site forms part of the agricultural valley floor with views up to Bulverton Hill. Landscape Character Type (LCT) 3A. Upper farmed and wooded valley slopes.

⁹⁸. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁹⁹ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

8. Coastal scenery ¹⁰⁰	No impacts – the Coastal Preservation Area lies to the west of the site, but is on higher land.
9. Heathland commons	No impacts
10. Elevated land	The hills flanking the wider Sid Valley form part of the ‘elevated fingers of land’ that are part of the special qualities of the EDNL. There is clear intervisibility between the site and Bulverton Hill to the west.
11. Agricultural valley bottoms	The site forms part of the valley bottom and is in agricultural use, but there is residential development to two sides and, when viewed from higher ground, the site is seen in the context of the urban area, which has grown out along the valleys of the River Side and the Wool Brook. However, there are very attractive views across the site towards higher ground, particularly towards Bulverton Hill.
12. Landscape quality ¹⁰¹	The site contributes to local landscape character with its open agricultural use, and relationship to Bulverton Hill. However, from many views it is seen in the context of the wider town and adjoins a busy road with associated infrastructure.
13. Scenic quality	The site has some rural character and makes a positive contribution to some views of the wider National Landscape.
14. Relative wildness	The site has low levels of wildness, being part of a managed landscape at the edge of a town.
15. Relative tranquillity	The adjoining housing and traffic on the adjacent road restrict levels of tranquillity.
16. Natural heritage features	Little impact.
17. Cultural heritage	Little impact.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	Yes. As highlighted in sections 10 and 11
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No

¹⁰⁰ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

¹⁰¹ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

19.5 Exceptional Circumstances Assessment Sidm_01

Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Sidm_01
Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?	Sidmouth is one of the main centres identified in the local plan for development to meet its own needs and that of the wider area.
Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?	There are very few alternative development sites at Sidmouth that are outside of the EDNL. The assessment of Sidm_12, which has a much smaller potential yield of 62, was discounted mainly due to landscape and heritage impacts. The only other sites outside of the EDNL (Sidm_20 and Sidm_22) have a combined yield of 54 and are located within the existing urban area, but are in active employment use. The combined yield of the sites allocated in Sidmouth is 172, which represents around 2.7% of the current number of homes in Sidmouth. This is a lower rate of growth than is compatible with the overall plan strategy and reflects the lack of suitable available sites.
Are there any cumulative impacts on the national landscape from other proposed allocations?	No, the other residential allocations are much smaller, and the combined impacts would be minimal.
What is the predicted landscape impact? Can any detrimental impacts be mitigated?	The landscape has a high/medium sensitivity to change. Detrimental impacts can be mitigated to some extent, but given the scale of development proposed there will be some change to the landscape.
What is the predicted environmental impact? Can any detrimental impacts be mitigated?	Site is within both the Beer Quarry and Caves SAC bat consultation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. No other environmental impacts are noted.
Are there any 'exceptional circumstances' that would justify development in the 'public interest'.	Yes. The context of plan strategy directing growth to Sidmouth, and the lack of suitable alternative sites outside of the EDNL constitute exceptional circumstances that justify the allocation.

19.6 Major Development Assessment for Sidm_06a

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Sidm_06a
3. Map	4. Aerial map

Sidm_06a Landscape Character Type	
5. Nature of development ¹⁰²	<p>Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.</p> <p>Commercial/ mixed use –Office/warehouse/light industrial with associated parking.</p>
6. Scale of development ¹⁰³	<p>30 dwellings.</p> <p>Sidmouth has a population of around 13, 280 which equates to 6354 homes. The percentage increase in the number of homes would be around 0.4%.</p>
7. Setting	<p>The site adjoins the northern part of the urban area and there is planning permission for employment development to the east on the other side of the busy A376. The land rises to the north and is in agricultural use.</p> <p>Landscape Character Type (LCT) mainly 3C. Sparsely settled farmed valley floors, but with a small area of 3A. Upper farmed and wooded valley slopes.</p>


¹⁰². Criteria 5, 6 and 7 are taken from the footnote to the NPPF

¹⁰³ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

8. Coastal scenery ¹⁰⁴	No impacts.
9. Heathland commons	No impacts
10. Elevated land	The hills flanking the wider Sid Valley form part of the ‘elevated fingers of land’ that are part of the special qualities of the EDNL. There is some intervisibility between these areas and the site, including views of Core Hill and Sidbury Castle from the site.
11. Agricultural valley bottoms	Minimal impacts – the site forms a small part of the valley bottom, but is largely seen in the context of the neighbouring urban area.
12. Landscape quality ¹⁰⁵	The site makes some contribution to local landscape character with views across the site to the higher land, but this is in the context of the larger town, busy A376 and the associated infrastructure.
13. Scenic quality	The site has some rural character, but this is diminished by its location adjacent to the A376, overhead wires and street lighting.
14. Relative wildness	The site has low levels of wildness, being part of a managed landscape at the edge of a town.
15. Relative tranquillity	The adjoining housing and traffic on the adjacent A376 restrict levels of tranquillity.
16. Natural heritage features	There are some boundary hedges with mature trees.
17. Cultural heritage	No impacts.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	Yes. As listed in section 11.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No

¹⁰⁴ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)



¹⁰⁵ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

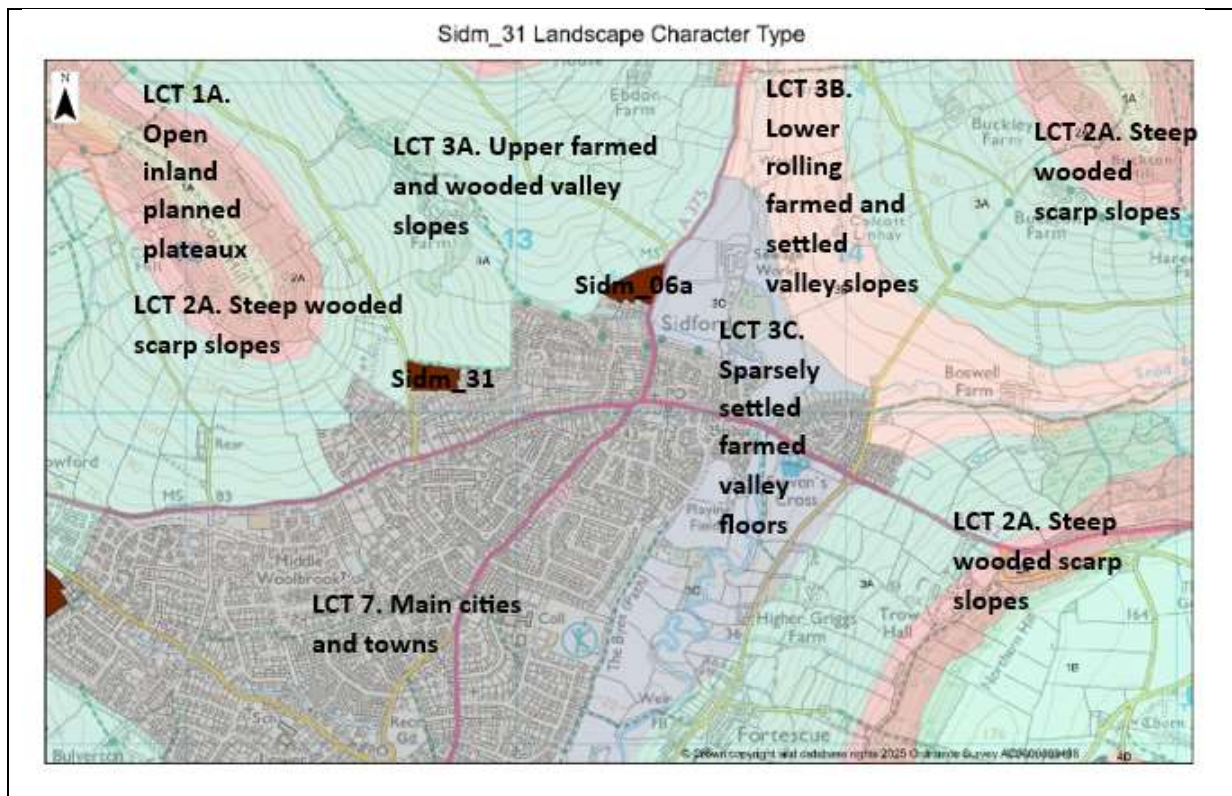
<p>20. Photos</p> <p>Site viewed from A376 looking north northwest towards Sidbury Castle.</p> <p>Site viewed from A376 looking southwest. Site is on lower ground behind tree with Core Hill to right of photograph.</p>	
<p>21. Would allocation constitute major on one criterion?</p>	<p>No.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>Yes, whilst the scale of development is minor in relation to the scale of Sidmouth, the development of the site could have some impact on the special qualities of the EDNL.</p>
<p>23. Major development?</p>	<p>Yes.</p>

19.7 Exceptional Circumstances Assessment for Sidm_06a

Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Sidm_06a
Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?	Sidmouth is one of the main centres identified in the local plan for development to meet its own needs and that of the wider area.
Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?	There are very few alternative development sites at Sidmouth that are outside of the EDNL. The assessment of Sidm_12 was discounted mainly due to landscape and heritage impacts. The only other sites outside of the EDNL (Sidm_20 and Sidm_22) have a combined yield of 54 and are located within the existing urban area, but are in active employment use. The combined yield of the sites allocated in Sidmouth is 172, which represents around 2.7% of the current number of homes in Sidmouth. This is a lower rate of growth than is compatible with the overall plan strategy and reflects the lack of suitable available sites.
Are there any cumulative impacts on the national landscape from other proposed allocations?	No. The combined impacts would be minimal.
What is the predicted landscape impact? Can any detrimental impacts be mitigated?	The landscape has a high/medium sensitivity to change. Detrimental impacts can be largely mitigated, but there will be some change to the landscape.
What is the predicted environmental impact? Can any detrimental impacts be mitigated?	Site is within both the Beer Quarry and Caves SAC bat consultation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. No other environmental impacts are noted.
Are there any 'exceptional circumstances' that would justify development in the 'public interest'.	Yes. The context of plan strategy directing growth to Sidmouth, and the lack of suitable alternative sites outside of the EDNL constitute exceptional circumstances that justify the allocation.

19.8 Major Development Assessment for Sidm_31

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Sidm_31
3. Map	4. Aerial map
	



5. Nature of development ¹⁰⁶	Housing – the allocation policy (Strategic Policy SD06: Sidmouth and its development allocations) specifies single storey housing.
6. Scale of development ¹⁰⁷	15 dwellings. Sidmouth has a population of around 13, 280 which equates to 6354 homes. The percentage increase in the number of homes would be around 0.2%.
7. Setting	The immediate context is the settlement edge to the south and east (mainly single storey detached homes) with open fields to the north and west. The site is on rising ground and elevated from the valley bottom. There are strong boundary hedges to the open countryside borders. There is lane to the east of the site and public footpath to the north. Landscape Character Type (LCT) 3A. Upper farmed and wooded valley slopes.
8. Coastal scenery ¹⁰⁸	No impacts.
9. Heathland commons	No impacts


¹⁰⁶ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

¹⁰⁷ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

¹⁰⁸ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

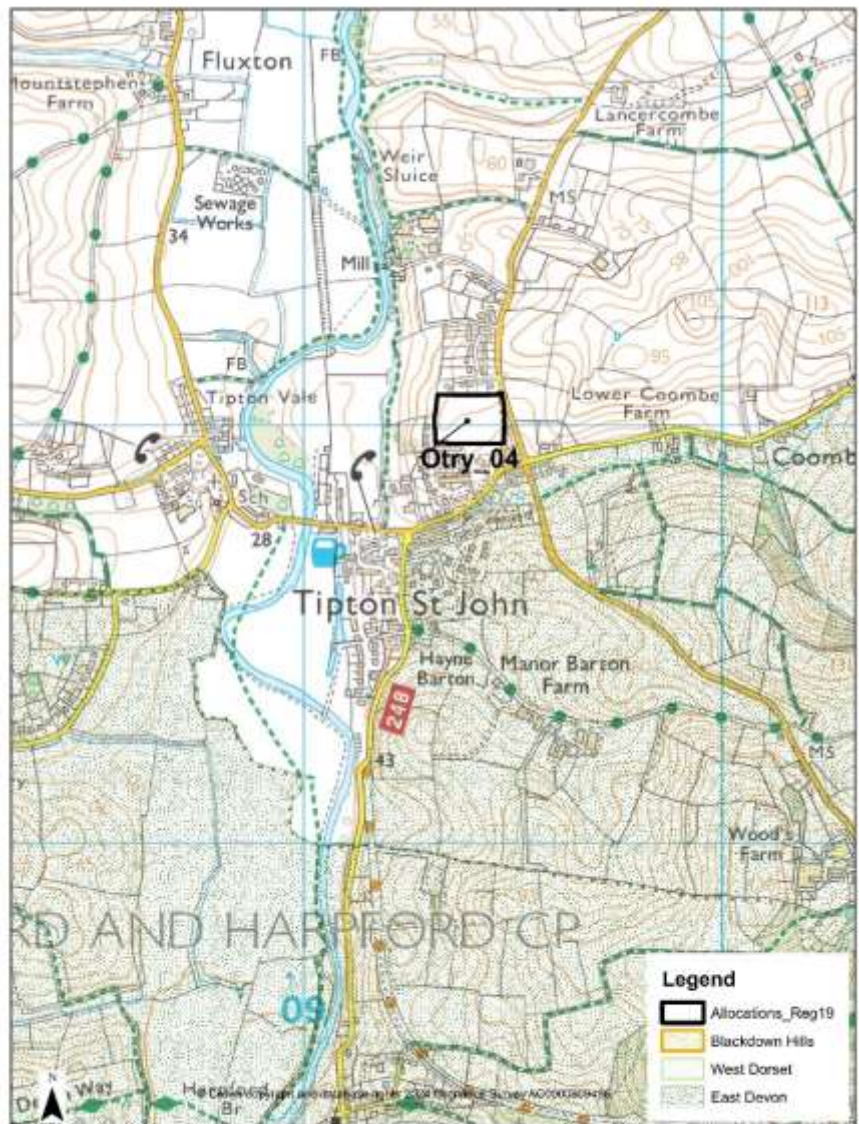
10. Elevated land	The hills flanking the wider Sid Valley form part of the ‘elevated fingers of land’ that are part of the special qualities of the EDNL. The site is located on a slope leading up to Core Hill and there is intervisibility between it and higher ground to the east. The site is seen in the context of the wider urban area, which rises up the hill to the south and east of the site.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ¹⁰⁹	The landscape makes some contribution to local landscape character, but the immediate context is the settlement edge. Although the site is outside of the current built-up area, it is small in comparison when viewed from across the Sid Valley.
13. Scenic quality	The site has a rural character, and affords good views to the east across the valley.
14. Relative wildness	The site has low levels of wildness, being part of a managed landscape at the edge of a town.
15. Relative tranquillity	There is some sense of tranquillity, but this is reduced by the neighbouring housing.
16. Natural heritage features	There are strong hedges to the open boundaries.
17. Cultural heritage	No impacts.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	Yes, as summarised in section 10.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No.

¹⁰⁹ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

<p>20. Photos</p> <p>The site is on elevated land with views across the valley.</p> <p>The site is seen in the context of the urban area when viewed from across the valley.</p>	
<p>21. Would allocation constitute major on one criterion?</p>	<p>No, the scale of impacts identified is considered to be minor.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>No.</p>
<p>23. Major development?</p>	<p>No - subject to the development being limited to single storey housing as required by the relevant local plan policy.</p>

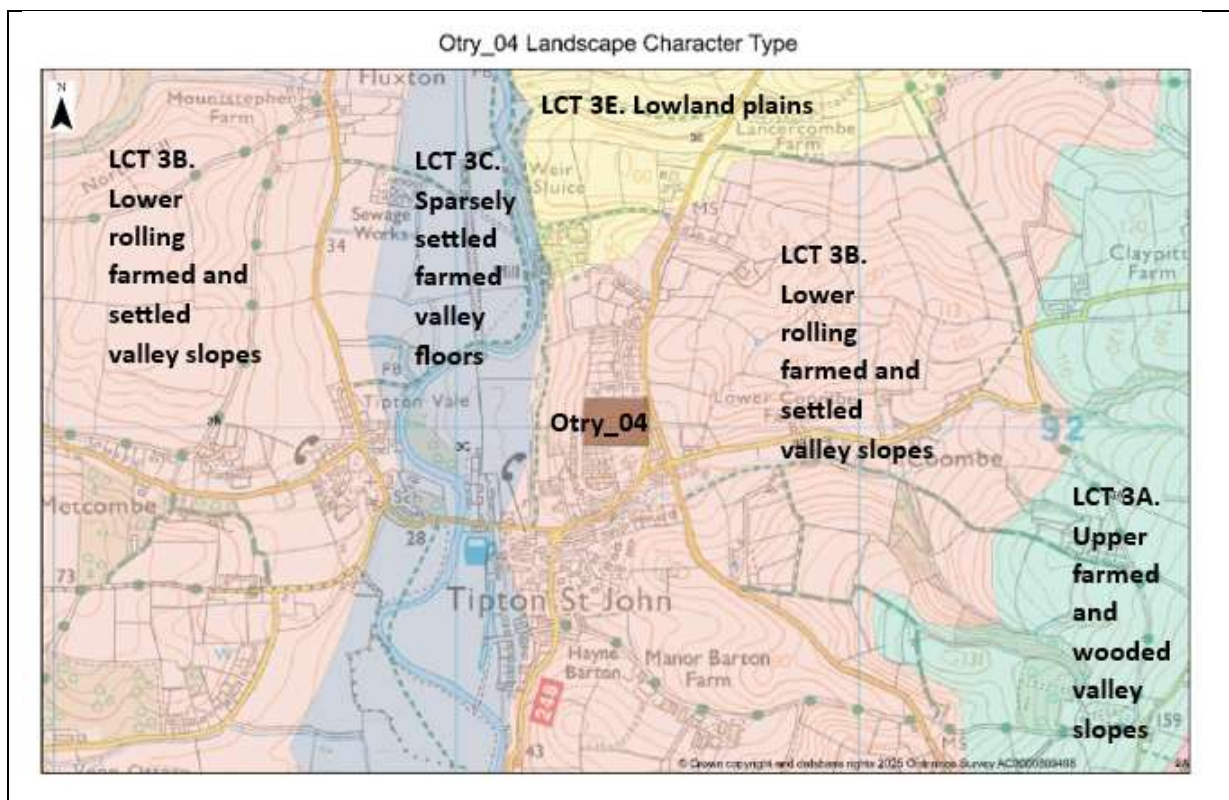
20 Tipton St. John

Tipton St. John is a village located partly within the East Devon National Landscape (EDNL). One site is proposed for a school and housing, Otry_04. The allocation is outside of the NL and is not considered to constitute major development in the context of the national landscape.



20.4 Major Development Assessment for Ottry_04


Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Ottr_04
3. Map	4. Aerial map



<p>5. Nature of development¹¹⁰</p>	<p>Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate.</p> <p>Primary school.</p>
<p>6. Scale of development¹¹¹</p>	<p>5 dwellings and a primary school.</p> <p>Tipton St. John has a population of around 606 which equates to 290 homes. The percentage increase in the number of homes would be around 1.7%.</p>
<p>7. Setting</p>	<p>The site is not in the EDNL, but is within 70 metres of it. The landscape assessment concludes that there is some intervisibility with the EDNL which would increase if site were developed, however this would be seen in the context of existing intervening development. The site is bounded on two sides by existing development. The scale and topography mean that development of this site is not small-scale infilling, but it would relate to the housing around it.</p> <p>Landscape Character Type (LCT) 3B. Lower rolling farmed and settled valley slopes.</p>

¹¹⁰. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

¹¹¹ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

8. Coastal scenery ¹¹²	No impacts.
9. Heathland commons	No impacts
10. Elevated land	No impacts.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ¹¹³	The site has a rural character and is self-contained and screened by existing development. It has a medium sensitivity to change.
13. Scenic quality	The site is enclosed by hedgerows and set off a reasonably quiet lane.
14. Relative wildness	The site has low levels of wildness, being part of a managed landscape within the village.
15. Relative tranquillity	The adjoining housing and traffic on the nearby road restrict levels of tranquillity.
16. Natural heritage features	There are mature trees to the site boundaries and some within the site.
17. Cultural heritage	No impact.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	No.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No
20. Photos Site viewed from the east.	

¹¹² Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

¹¹³ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

21. Would allocation constitute major on one criterion?	No.
22. Would allocation constitute major with any combination of criteria?	No.
23. Major development?	No.

21 Appendix A Extracts from the East Devon NL Management Plan and Planning Guidance¹¹⁴

WHAT IS MAJOR DEVELOPMENT?

The National Planning Policy Framework (NPPF) does not define or seek to illustrate the meaning of the phrase ‘major development’ in protected landscapes. Assessing whether a proposed development is a major development for the purposes of paragraph 172 is a matter of judgment for the local planning authority (eg East Devon District Council or Devon County Council) taking into account the proposal in question and the local context. The Local Plan for East Devon does qualify and reference ‘major’. Footnote 55 from the NPPF: “Whether a proposal is ‘major development’ is a matter for the decision maker, taking into account the nature, scale and setting [of the proposed development], and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined” Paragraph 172 of the NPPF is clear that great weight should be given to conserving landscape and scenic beauty in these designated areas, irrespective of whether or not it is considered to be Major Development.⁴ It makes it clear that development could be granted, but only in exceptional circumstances and where in the public interest.

HOW TO APPLY THE TESTS AND ASSESSMENTS UNDER NPPF PARAGRAPH 172

If the decision-taker, in our case usually East Devon DC, (but could also be Devon CC or even the Secretary of State in the case of National Strategy Infrastructure Projects) has determined that development in the AONB is ‘major development’, it will assess the three criteria referred to in paragraph 172 (see page 10). The decision-taker will have regard to any other relevant considerations, and it will then undertake the weighted balancing exercise, noting that: • the presumption in favour of development has been removed because major development in AONB should normally be refused; and • great weight is to be given to the conservation of landscape and scenic beauty and • demonstration of public interest is in addition to consideration of exceptional circumstances.

THE NEEDS ASSESSMENT

The assessment in NPPF paragraph 172 sub-paragraph a) should address whether there is a need for the specific development proposed, including any national considerations and the economic impact of permitting or refusing it on the local economy.

THE ALTERNATIVES ASSESSMENT

The purpose of the assessment in subparagraph b) of paragraph 172 was set out in the High Court as: ‘Its purpose is to ascertain whether an alternative site may be available so as to avoid development in the AONB. It requires other available sites in the area to be assessed, on

¹¹⁴ [AONB-Planning-Guidance-Documents-LOWRES.pdf \(eastdevonaonb.org.uk\)](#)

their merits, as possible alternative locations for the proposed development'. The determining authority cannot insist that a developer provide an alternatives assessment. It is an assessment for the determining authority to carry out as decision taker. However, it is suggested that developers consider covering this for clarity and to aid the decision-making process. As a guide, assessments of alternative sites could consider the following: • sites outside the AONB, including those outside the local planning authority's area; • sites that would result in less harm to the AONB; • land of lesser environmental value • alternative ways of meeting the need in some other way than through the proposed development.

East Devon Special qualities [AONB-Partnership-plan_lowres_final.pdf](#)
(eastdevonaonb.org.uk)

East Devon AONB is notable for its varied and dramatic coastal scenery; the grandeur of sheer red sandstone cliffs, intimate wooded combs and coves contrast with the stark, white chalk outcrop that punctuates the coast at Beer Head and further east, the wilderness of the undercliffs. Its special qualities do not stop at the coast. Inland, the heathland commons provide high, open and remote plateaux. Important recreationally, the heathland habitat is valuable for its flora and fauna and contrasts sharply with the lower undulating agricultural mosaic of small fields, hedgerows and woodland copse. Elevated fingers of land extend from the Blackdown Hills to the north, their height and linearity accentuated by cathedral-like beech avenues; woodlands clad their sides, flowing down steep sided goyles to infiltrate the tranquil and often intimate agricultural valleys below. This contrasts with the broad flat floodplains of the Axe and Otter which cut into the area, drawing their life from tributaries deep within the valleys of the undulating hinterland. The human engagement, use and management of this land since pre-historic times has guided the pattern and shape of the settlements, field patterns, woodland and heath, creating a landscape of significant scenic beauty that is the basis for its agricultural and tourism economy. Recreational, cultural and spiritual qualities abound, with the South West Coast Path, East Devon Way and open access land, most notably on the Pebblebed Heaths, providing extensive opportunities for open air recreation, healthy exercise, uninterrupted views or an escape to tranquillity and relative isolation. Our association with the cultural and heritage dimension of the landscape has inspired descriptive writing, poetry, art and song for generations. The Countryside Commission appraisal of the East Devon AONB (CCP442) identifies many of these associations and special qualities and has been more recently supplemented by assessments of the character of the landscape at the national, county and local level. These assessments have enabled further articulation of the special qualities and features of significance as they relate to natural beauty, which are summarised in the table on the following page. These features of significance and special qualities are axiomatic to what goes into making the natural beauty of the landscape of such high quality. Alongside the key characteristics of the landscape areas and types, they require protection, conservation and enhancement if the AONB is to retain its character and status amongst England's finest landscapes. Appendix 1 contains a table showing the links between special qualities and landscape character of the AONB.

22 Appendix B Extracts from Blackdown Hills Management Plan¹¹⁵ and East Devon Planning Guidance¹¹⁶

Major Development Footnote 55 of the NPPF clarifies that: ‘For the purposes of paragraphs 172 [relating to protected landscapes, including AONBs] and 173 [relating to Heritage Coasts], whether a development is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined’. As such, it is not possible or appropriate to apply a blanket definition for what should be treated as major development in the Blackdown Hills AONB. Nevertheless, there are some key factors that help to define if a development is major, as outlined below. The purpose for which the Blackdown Hills AONB has been designated is to conserve and enhance its natural beauty. Therefore, the judgement as to whether or not a development is major development depends, to a large degree, on whether or not the development could have a significant adverse impact on the natural beauty of the AONB. As outlined in Section 3.1, natural beauty incorporates a number of criteria, including landscape quality, scenic quality, tranquillity, natural heritage and cultural heritage. Within the context of the Blackdown Hills AONB, those aspects of the AONB’s natural beauty which make the area distinctive and which are particularly valuable – the AONB’s ‘special qualities’ - are also described in Section 3. On this basis, a development should be considered ‘major’ if, by reason of its nature, scale, location and/or setting, it could have a significant adverse impact on any of the above criteria, including the AONB’s ‘special qualities’. As well as potential impacts within the AONB, consideration should also be given to impacts on these criteria within the setting of the AONB, particularly in the context of visual impact (i.e. views into and out of the AONB) and impacts on tranquillity.

Public Interest

As outlined in paragraph 172 of the NPPF, to help inform whether there are exceptional circumstances and whether it can be demonstrated that the development is in the public interest, applications for such development should include an assessment of:

- a. ‘the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy’; The AONB Partnership would expect any such development proposal to be accompanied by a statement of need in the context of national and local considerations and, ideally, in the context of needs arising from within the AONB. The impacts of permitting or refusing the development should be clearly identified in respect of the local economy, ideally including that of the local communities affected. Such a statement should be based on objective assessment and clear evidence.

¹¹⁵ [bhaonb_management_plan_2019-24.pdf](https://blackdownhillsaonb.org.uk/bhaonb_management_plan_2019-24.pdf) (blackdownhillsaonb.org.uk)

¹¹⁶ [AONB-Planning-Guidance-Document-LOWRES.pdf](https://eastdevonaonb.org.uk/AONB-Planning-Guidance-Document-LOWRES.pdf) (eastdevonaonb.org.uk)

- b. ‘the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way’; The AONB Partnership would encourage any such development proposal to be accompanied by a report setting out a sequential approach to site selection. This should evidence the extent to which alternative sites have been assessed before the selection of sites within the AONB, and clearly identify why sites outside of the designated area could not be developed. The report should also identify and evidence why the need for the development could not be met in some other way. The report should include relevant evidence regarding the cost of developing outside the AONB. The AONB Partnership is mindful of the judicial review decision in relation to development in Cornwall AONB, which confirmed that even if there are exceptional circumstances generally, such as the need for housing, this does not necessarily equate to exceptional circumstances for a particular development because there may be alternative sites that could result in less harm to the AONB. These can be outside the local planning authority’s area. Thus the proper consideration of alternatives, (with a view to ascertaining if alternative(s) which would result in less harm to the AONB exist), is an essential component of exercising the assessments correctly.
- c. ‘any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated’. The AONB Partnership would expect any such development proposal to be accompanied by a report identifying any detrimental effects upon the environment, the landscape and recreational opportunities. Such a report should relate directly to the natural beauty and special qualities of the AONB as a whole as well as those specific to the development site. Any mitigation identified to moderate these impacts should be: • clearly detailed, in line with the duty to conserve and enhance the AONB, • be compatible with the objectives and policies of the AONB Management Plan, • be compatible with special qualities and local landscape character, and • be capable of realisation through robust planning conditions or obligation.

Blackdown Hills special qualities

The Special Landscape Character

Key to the Blackdown Hills designation as an AONB is the subtle combination of four aspects of the landscape (The Blackdown Hills landscape: A landscape assessment. Countryside Commission, 1989):

It is an isolated and unspoilt rural area and remains relatively undisturbed by modern development and so ancient landscape features, special habitats, historical and archaeological remains have survived intact. There is a sense of stepping back in time in the winding lanes, the hidden valleys and relatively remote villages. The traditional pattern of villages, hamlets, paths and roads remains largely unchanged and there is an identifiable and characteristic vernacular, pastoral landscape.

There is a diversity of landscape patterns and pictures. The visual quality of the landscape is high and is derived from the complex patterns and mosaics of landscapes. Although the scenery is immensely varied, particular features are repeated. Ancient, species-rich hedgerows delineate

the fields and define the character of the landscape, enclosing narrow twisting lanes. There are long views over field-patterned landscapes. The high plateau is dissected by steep valleys, supporting a patchwork of woodland and heath, and there are fine avenues of beech along the ridge. The history of medieval and parliamentary enclosures has resulted in an individual, patchwork landscape of small fields in the valleys and larger fields with straight hedges on the plateau.

There is a unique geology. The composition of the underlying geology of the Blackdown Hills and the adjoining East Devon AONB is unique in Britain and is one of the area's strongest unifying features. It has given rise to the distinct topography of a flat-topped plateau, sharp ridges and spring-lined valleys. The springs have created the characteristic pattern of rough grassland, mire and woodland vegetation on the valley sides. The nature of the Greensand rock has meant that plant communities are particularly diverse. Moreover, the geology has provided a local building material, chert, which is uncommon elsewhere.

It is a landscape with architectural appeal. The landscape pattern is punctuated by a wealth of small villages, hamlets and isolated farmsteads of architectural value and distinctive character. Devon and Somerset are recognised nationally for their fine rural architecture, but the Blackdown Hills contain a special concentration of buildings where the vernacular character is particularly well preserved. Predominant materials are chert and cob with thatch, often now replaced by corrugated iron, or clay-tiled roofs. The appeal lies in the way in which the buildings fit so naturally into their surroundings.

Landscape quality

- A managed landscape sculpted and maintained by the stewardship of generations of those who work the land
- Undeveloped skyline of the northern scarp slope is a prominent feature in views from the Vale of Taunton and beyond
- Rich mosaic of diverse and interconnected semi-natural habitats; a patchwork of woodland, heathland, meadow and mire linked by hedgerows
- Clear, unpolluted streams that meander down the valleys to feed the Yarty, Otter, Culm rivers
- Ancient and veteran trees in hedgerows, fields and woodland
- A settled landscape with a strong sense of time-depth containing farms and small scattered villages well related to the landscape

Scenic quality

- The elevation and long, panoramic views out from the Blackdown Hills create a sense of detachment from surrounding towns and transport corridors

- Unspoilt, panoramic views across flat-topped plateau and straight undisturbed ridge tops and over hidden valleys
- A well-wooded pastoral landscape with a strong pattern of hedges and hedgerow trees
- Pattern of regular, large-scale enclosure fields on the plateau contrasts with the smaller, curving medieval fields on the valley slopes
- Majestic avenues of beech trees along northern ridges
- Long straight roads across the plateau with verges and low, neat hedges give way to narrow, enclosed, high-hedged winding single-tracked lanes in the valleys
- Wellington Monument is a key landscape feature identifying the Blackdown Hills over a very wide area in all directions

Relative wildness

- A sense of remoteness enhanced by the exposure of the plateau and more intimate extensive woodland of the upper slopes and hidden valleys
- Wide open spaces provide exposure to the elements; big sky, windswept places, contrasts of sunlight and shadow

Relative tranquillity

- Areas of high tranquillity spared many of the intrusions of modern life
- Places to enjoy natural sounds; the melody of the song thrush and skylark, the call of buzzards
- Dark night-time star-filled skies contrasting with the light pollution of the surrounding towns

Natural heritage features

- One of the finest, most extensive Greensand plateau in Britain; a distinctive landform that contrasts with the surrounding lowlands to the east, north and west
- The presence of straight, uninterrupted ridges are evident as a visual backdrop over a wide area
- Distinctive spring-line mires located around the upper slopes of the valleys
- The varied landscape supports a rich assemblage of wildlife including many species of bats, butterflies and meadow flowers and healthy populations of ferns, lichens, mosses and fungi
- Ancient, species-rich hedges with many hedgerow trees and flower-rich banks; colourful displays of primrose and bluebells in spring

- A network of ancient semi-natural woodland linked by hedgerows support a thriving dormouse population
- Streams and rivers are home to otters, lamprey and the vulnerable white-clawed crayfish

Cultural heritage

- The number and extent of well-preserved buildings in the local vernacular – chert, cob and thatch – are an important element of the landscape
- Hillforts are prominent features on the ends of the plateau ridges
- Mining remains from the once internationally significant whetstone industry and extensive evidence of iron-working
- Three World War Two airfields and their associated buildings are found on the high, flat land of the plateau
- A community with a strong sense of place closely linked to the land and its management, with a particularly strong tradition of hedge laying
- A landscape that has inspired artists from the early 20th century Camden Town Group to the Blackdown Hills Artists and Makers of today.

23 Appendix C – Form 1: East Devon National Landscape Major Development Assessment Form

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Insert reference
3. Map	4. Aerial map Insert OS and aerial map showing site in context of surrounding land.
5. Nature of development ¹¹⁷	Insert allocation description, such as housing/employment.
6. Scale of development ¹¹⁸	Insert number of homes or area proposed for employment or other uses. For housing calculate percentage increase in homes in relation to settlement.
7. Setting	Insert brief description of site and its landscape setting.
8. Coastal scenery ¹¹⁹	Describe any impacts or that there are no impacts.
9. Heathland commons	Describe any impacts or that there are no impacts.
10. Elevated land	Describe any impacts or that there are no impacts.
11. Agricultural valley bottoms	Describe any impacts or that there are no impacts.
12. Landscape quality ¹²⁰	Insert key findings from the relevant site selection report.
13. Scenic quality	Describe any factors contributing to criteria together with indication of level of impact – low, medium or high.
14. Relative wildness	Describe any factors contributing to criteria together with indication of level of impact – low, medium or high.
15. Relative tranquillity	Describe any factors contributing to criteria together with indication of level of impact – low, medium or high.

¹¹⁷ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

¹¹⁸ Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

¹¹⁹ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in section 0.6 of the [management plan](#)

¹²⁰ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

16. Natural heritage features	Describe any factors contributing to criteria together with indication of level of impact – low, medium or high.
17. Cultural heritage	Describe any factors contributing to criteria together with indication of level of impact – low, medium or high.
18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?	Yes or No. If yes reference the special quality and the impact. Would the impact be low, medium or high.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	Yes or No
20. Photos	Insert relevant photographs with note of where they were taken.
21. Would allocation constitute major on one criterion?	Yes or No. If yes specify the criterion.
22. Would allocation constitute major with any combination of criteria?	Yes or No. If yes specify the criteria.
23. Major development?	Yes or No. Summarise reason for decision.

24 Appendix D – Form 2 Blackdown Hills National Landscape Major Development Assessment Form

Form 2: Assessment of Major Development in the Blackdown Hills National Landscape	
Criteria	Assessment
1. Protected Landscape	Blackdown Hills
2. Reference	Insert Reference
3. Map	4. Aerial map Insert OS and aerial map showing site in context of surrounding land.
5. Nature of development ¹²¹	Insert allocation description, such as housing/employment.
6. Scale of development ¹²²	Insert number of homes or area proposed for employment or other uses. For housing calculate percentage increase in homes in relation to settlement.
7. Setting	Insert brief description of site and its landscape setting.
8. Isolation ¹²³	Describe any impacts or that there are no impacts.
9. Landscape Pattern	Describe any impacts or that there are no impacts.
10. Geology	Describe any impacts or that there are no impacts.
11. Architecture	Describe any impacts or that there are no impacts.
12. Landscape quality ¹²⁴	Insert key findings from the relevant site selection report.
13. Scenic quality	Describe any factors contributing to criteria together with indication of level of impact – low, medium or high.
14. Relative wildness	Describe any factors contributing to criteria together with indication of level of impact – low, medium or high.
15. Relative tranquillity	Describe any factors contributing to criteria together with indication of level of impact – low, medium or high.

¹²¹ . Criteria 5, 6 and 7 are taken from the footnote to the NPPF

¹²² Scale is assessed in relation to the adjoining settlement. Number of dwellings is based on approximate 2021 population divided by an occupancy rate of 2.09. A percentage increase in dwellings of 10% or more would indicate a 'significant' increase likely to be regarded as 'major' development under this criterion, unless specific site characteristics can be shown that, in terms of the special qualities of the national landscape the increase in scale was not significant

¹²³ Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) 'The Special Landscape Character'

¹²⁴ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

16. Natural heritage features	Describe any factors contributing to criteria together with indication of level of impact – low, medium or high.
17. Cultural heritage	Describe any factors contributing to criteria together with indication of level of impact – low, medium or high.
18. Would any of the special qualities summarised in the Blackdown Hills management plan be affected by the proposed development? ¹²⁵	Yes or No. If yes reference the special quality and the impact. Would the impact be low, medium or high.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined ¹²⁶ ?	Yes or No
20. Photos	Insert relevant photographs with note of where they were taken.
21. Would allocation constitute major on any one criterion?	Yes or No. If yes specify the criterion.
22. Would allocation constitute major with any combination of criteria?	Yes or No. If yes specify the criterion.
23. Major development?	Yes or No. Summarise reason for decision.

¹²⁵ See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf](#) ([blackdownhillsaonb.org.uk](#))

¹²⁶ Blackdown Hills [Management](#) Plan and extract of page 19 in Appendix 2

25 Appendix E – Form 3: Assessment of Exceptional Circumstances

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	
Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?	Refer to Strategic Policy 1
Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?	Apply a 'sequential test' to any suitable alternative sites.
Are there any cumulative impacts on the national landscape from other proposed allocations?	Note any additional allocations or extant planning permissions and assess their cumulative impacts.
What is the predicted landscape impact? Can any detrimental impacts be mitigated?	Summary assessment from site selection methodology.
What is the predicted environmental impact? Can any detrimental impacts be mitigated?	Summarise relevant assessments from site selection methodology.
Are there any 'exceptional circumstances' that would justify development in the 'public interest'.	Relate to local plan.