

The East Devon Local Plan 2020-2042: Publication Plan - Regulation 19

Response to Consultation by email from:

Blackdown Hills National Landscape



Submitted by:
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30/03/2025



What part of the plan does representation relate to?

Chapter 5. Development in the Towns and Villages

Is this part of the plan sound?

Positively prepared: The Plan should meet our area's needs for housing, jobs, and other development, while considering how we might help neighbouring areas meet their needs too.

Justified: Our chosen strategies and policies should be based on solid evidence and should be the most appropriate when compared to other options we could have chosen.

Effective: The policies and proposals in the Plan need to be achievable and deliverable over the next 15-20 years.

Consistent with national policy: Our Plan needs to align with national planning requirements while addressing local priorities.

No

If no, please give details of why you consider this part of the Plan is not sound. Please be as precise as possible.

We consider that the overall approach to allocations does not adequately address your duty to seek to further the conservation and enhancement of the National Landscape. As such it is not justified, effective or consistent with national policy. These comments apply to the main plan document and to Topic Paper SAL – 048 Major Development in National Landscapes.

We have identified the following shortcomings:

1. Strategically, what alternatives have been considered? Of the overall housing and employment numbers, the number in or adjacent to the National Landscapes is relatively small, and of those some will be within settlements or otherwise acceptable (some examples are given of large sites where the bulk of development is some distance from the protected landscapes). However, in terms of conserving the integrity of the protected landscapes, the impact is considerable, and might alternatives such as fewer allocations in locations such as Honiton and more allocations at Cranbrook/West End be an appropriate measure?

Whilst noting the local plan strategy/settlement hierarchy, we suggest there is still a need to reflect on that in the context of the NPPF – paragraph 182 (Dec 2023), which is clear that ‘the scale and extent of development within all these designated areas should be limited’ and also recognises that ‘development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas’.

2. The site assessment process was not applied from the outset of plan preparation, i.e. it was applied retrospectively to many sites rather than taking a landscape-led approach to informing site choices.

3. A consistent process, including consideration of natural beauty factors, to identify whether a site could be deemed major in a protected landscape context is a positive approach, but is not the same as actively determining whether that development at that location would serve to seek to further the purpose. For this, a more detailed consideration of the site allocation in relation to special qualities would be required.

Issues and impacts on the conservation and enhancement of natural beauty to consider include;

- The effects of the introduction of built form and associated infrastructure
- Topography – steep slopes likely to require significant earthworks/ retaining structures
- Impact of light spill from street lighting or windows on areas noted for dark skies
- Impact on tranquillity through increased levels of site activity and increased traffic movement on surrounding roads
- Whether major road alterations be needed, or the more insidious erosion of local distinctiveness (e.g. visibility splays, highway infrastructure)
- Loss of trees/ hedgerow/other noteworthy habitats
- Impact on watercourses/ waterbodies
- Construction phase impacts including potential off site impacts, e.g large delivery vehicles or construction plant accessing narrow winding lanes.

4. The site assessment tables (landscape and scenic quality) focus on the site, however the site should be considered in context as part of a wider landscape of special qualities; for example one individual field may not demonstrate outstanding qualities in itself, but it is an element of a field patterned patchwork landscape, all unspoilt and undeveloped, which is a valued quality. It may also be part of a vista viewed from afar, another special quality, which would be adversely impacted by development.

5. The site assessment tables demonstrate a lack of appreciation and sensitivity to natural beauty and special qualities, illustrated by a simple example; for nature of development, each housing site includes ‘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’. There is simply no historical precedent for 2.5/3

storey dwellings in the Blackdown Hills, and even the modern 8.5 metres house is taller than many traditional cottages. Such buildings would not conserve and enhance natural beauty and should be avoided.

6. Some of the sites are very late introductions into the local plan (Honi_12 and Honi_18 for example), which has not allowed for full public consideration and scrutiny.

7. Some of the allocated sites, e.g. Honi_07, Honi_12, Honi_13 and Brhe_09, are noted as having heritage and landscape sensitivities. It is questionable therefore as to why these are being pursued, and does allocation of these (and others) in or adjacent to the National Landscape(s) really seek to further the purpose?

Please set out the modification(s) you consider necessary to make this part of the Plan sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

Ultimately, reconsideration/removal of some sites that are in or adjacent to the National Landscapes would address the above concerns.

Greater consideration of impacts and implications of policies and allocations in relation to seeking to further the purpose of the National Landscapes.

At the very least, further guidance/parameters/requirements should be set out for each allocated site, and paragraph 5.2 (and elsewhere) should provide better signposting to key policies elsewhere in the plan, noting where design, etc is particularly key to the acceptability of future proposals.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s).

What part of the plan does representation relate to?

Chapter 10. High Quality Design

Is this part of the plan sound?

Positively prepared: The Plan should meet our area's needs for housing, jobs, and other development, while considering how we might help neighbouring areas meet their needs too.

Justified: Our chosen strategies and policies should be based on solid evidence and should be the most appropriate when compared to other options we could have chosen.

Effective: The policies and proposals in the Plan need to be achievable and deliverable over the next 15-20 years.

Consistent with national policy: Our Plan needs to align with national planning requirements while addressing local priorities.

No

If no, please give details of why you consider this part of the Plan is not sound. Please be as precise as possible.

This set of policies are critical considerations if site allocations in or affecting National Landscapes are to contribute to seeking to conserve and enhance natural beauty. While there is much to be welcomed, there are considered to be some shortcomings;

Paragraph 10.3 – this paragraph notes that ‘The design of development at these allocations is crucial to preserving valuable landscapes, especially in sensitive sites like National Landscapes or heritage assets. Design codes will guide future proposals, ensuring new development is resilient and well-integrated into the environment.’ There is nothing to indicate when design codes will be adopted, so there is uncertainty over this. It should make clear that until such time, and alongside, the policies of this section apply.

Policy DS01 – The reference here to the Blackdown Hills design guide for houses is welcome, however it is anticipated that this will be reviewed and updated within the plan period, and so this should be clarified accordingly to remain valid.

Criteria E .4 and .8 refer to ‘appropriate lighting’ – there should be some reference to light pollution and dark skies.

Policy DS02 – the policy notes that proposals should optimise the density of the site in a manner that conserves or enhances the character of the area. In National Landscapes proposals should conserve *and* enhance.

The second part of this policy refers to ‘those in environmentally or heritage sensitive locations’ without expressing what ‘those’ are or defining an environmentally or heritage sensitive location.

Please set out the modification(s) you consider necessary to make this part of the Plan sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Plan sound. It will be helpful if you are able to put

forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

Paragraph 10.3 – the inclusion of a brief additional statement to clarify and confirm that these policies apply to development on allocated sites would assist with justification and effective implementation and be consistent with national planning policy (NPPF para 182 [Dec 2023])

Policy DS01 – The effectiveness of the plan will be improved by amending the wording to recognise that future updated versions of the Blackdown Hills design guide for houses should also be referenced.

‘Appropriate’ lighting would be more effective and appropriate for application in more rural, intrinsically darker areas of the district if there were cross reference to limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation (NPPF Dec 2023 paragraph 191).

Policy DS02 – Amend the policy wording to include a clear reference to ‘conserving and enhancing’ character specifically in National Landscapes.

Seek to clarify ‘those’ and specify if required (should be) in or adjacent National Landscapes.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s).