

Filtered Data Export

**Full name:** Penny Mills

**Organisation (where relevant):** CPRE Devon

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD01

**1(b). Does your comment relate to one of the changes listed above?:** No

**1(c). If the comment is related to a site, please state the site reference here.:**  
Exmo\_20

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:** Devon CPRE are aware of significant community concern regarding Policy SD01 – Land at St John’s (Exmo\_20), including conflicts with national and local plan policies, environmental and biodiversity impacts, flood risk, heritage and landscape impacts, and procedural issues. In addition, we wish to raise the following objection: Land at St John’s (Exmo\_20) constitutes major development in landscape terms. Land at St John’s (Exmo\_20) constitutes major development in landscape impact terms. The proposal is a large-scale urban extension, including employment land, community facilities, and a new vehicular access from the B3179. The enhanced duty on Local Planning Authorities under the Levelling Up and Regeneration Act 2023, together with national planning policy in the National Planning Policy Framework (NPPF) (paragraphs 189–190), makes clear that whether development constitutes “major development” and whether it has the potential to impact a National Landscape (NL) are matters of fact and degree. Such assessments should be made having regard to the scale, character, and likely impacts of the proposal, consistent with the NPPF’s approach to conserving and enhancing valued landscapes. A development of this magnitude:

- Introduces substantial built form, infrastructure, movement, lighting, and activity.
- Represents a fundamental change from rural/undeveloped land to urban use.
- Has effects that extend well beyond the red line boundary. On this basis alone, the allocation meets the threshold of major development in landscape terms. Warranting careful assessment of its effects on the NL and its setting. Land at St John’s (Exmo\_20) -

disconnects between evidence and policy response to NL. · Evidence base - Impacts on the setting of the NL are underestimated The 'Topic Paper SAL – 049 (Rev) Major Development in National Landscapes Second Regulation 19 version' (October 2025) assessment places disproportionate reliance on the absence of built housing immediately adjacent to the NL boundary. The higher ground adjacent to the NL: · Contributes to its landscape character, openness and visual containment. · Forms part of the wider landscape context that supports the purposes of designation. Development within this setting can: · Be visible from within the NL. · Alter key views, skylines and perceptual qualities such as tranquillity and remoteness. · Introduce an urbanising influence that erodes the transition between designated and non-designated land. These indirect but significant effects are not adequately assessed. · Evidence base - Indicative masterplan provides insufficient certainty 'Topic Paper SAL – 049 (Rev) Major Development in National Landscapes Second Regulation 19 version' (October 2025) relies heavily on an indicative masterplan showing no built development close to the NL. However: · Indicative masterplans carry limited weight and can change. · Infrastructure such as access roads, drainage, lighting, signage, earthworks and landscaping can themselves have significant landscape effects. · The allocation policy insufficiently responds to NL Strategic Policy SD01 Land at St John's (Exmo\_20) explicitly allocates: · Around 700 dwellings. · Employment land and community facilities. · A new primary vehicular access from the B3179. This establishes, in principle, a comprehensive and strategic development whose impacts on the setting of the NL are inevitable, regardless of later design detail. While the policy requires built development to be concentrated in the southern part of the site, the northern and north-eastern areas remain integral to the scheme, accommodating: · The primary access road. · SANGs and open space. · Buffers, landscaping, parking controls and habitat creation. These elements are not landscape-neutral and will introduce: · Engineered landform. · Movement, noise and visual activity. · An urbanising influence along the edge of the NL. The extensive safeguards required by the allocation including: · Avoidance of street lighting. · Structural planting and screening. · Retention of buffers. · Protection of tranquillity and visual amenity. demonstrate that the site lies within a highly sensitive landscape context. The need for such controls reinforces the potential for conflict with the purposes of the NL. The 400-metre exclusion zone from the Pebblebed Heaths is primarily an ecological safeguard. It does not prevent landscape or visual harm, nor does it address impacts on character, tranquillity or experiential qualities of the NL. While the allocation requires development to come forward based on an agreed masterplan, this does not provide sufficient certainty to conclude that there will be no significant adverse impact on the purposes of the NL The masterplan requirement is concerned with: · Phasing and coordination across land parcels. · Infrastructure delivery and cost apportionment. · Design responses to heritage, mineral, biodiversity and access constraints. In summary, the Policy embeds mitigation measures that insufficiently acknowledge landscape sensitivity and does not guarantee

protection of the setting, tranquillity or purposes of the NL. Land at St John's (Exmo\_20) disconnects between evidence and policy response to the historic environment. · Evidence base – failure to identify combined impacts on heritage setting and setting of the NL The 'Site Selection report Addendum –Historic Environment Site Assessment Exmouth' (November 2025) assessment repeatedly describes the Grade II\* Church of St John in the Wilderness's setting using language that directly overlaps with the purposes and special qualities of the NL including: · tranquillity, · remoteness, · openness, · undeveloped countryside, · dark skies, · rising landform and wooded horizons. Crucially: · The north and north-east of the church, identified as sensitive to heritage harm are also the areas that: o lie closest to the NL; and o contribute to its setting, However, the 'Site Selection report Addendum –Historic Environment Site Assessment Exmouth' (November 2025) assessment does not sufficiently recognise that the church's setting is functionally and perceptually linked to the setting of the NL. The absence of explicit reference to the NL in the heritage conclusions underplays the combined sensitivity of this location and weakens the evidence and policy response. · Policy requirements provide insufficient certainty Strategic Policy SD01 Land at St John's (Exmo\_20) relies heavily on future master-planning to address impacts on the setting of the Grade II\* Church of St John in the Wilderness. However, the 'Site Selection report Addendum –Historic Environment Site Assessment Exmouth' (November 2025) identifies location specific sensitivity, including land where development would harm the church's setting through loss of openness and tranquillity. Strategic Policy SD01 Land at St John's (Exmo\_20) requires an agreed masterplan, but: · It does not define fixed no-development areas around the church. · It does not translate the sensitivity mapping into policy constraints. · It does not link housing numbers to heritage or landscape capacity. · It does not require an integrated heritage landscape assessment to inform the masterplan. In summary, the masterplan is in danger of being a substitute for policy clarity, rather than a mechanism for implementing it. Summary of Objection · Exmo\_20 is a major development in landscape terms. · Landscape Impacts: Policy and evidence understate potential impacts on NL character, tranquillity, and visual quality. · Heritage Impacts: Policy fails to adequately protect the Grade II\* church's setting or its interaction with the NL. Conclusion Policy SD01 fails to provide adequate protection to the landscape and heritage setting and does not demonstrate compliance with national planning policy regarding major development in landscape terms and the setting of the NL.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter legally compliant. 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.:**

Delete Exmo\_20

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

Devon CPRE are aware of significant community concern regarding Policy SD01 – Land at St John’s (Exmo\_20), including conflicts with national and local plan policies, environmental and biodiversity impacts, flood risk, heritage and landscape impacts, and procedural issues. In addition, we wish to raise the following objection: Land at St John’s (Exmo\_20) constitutes major development in landscape terms. Land at St John’s (Exmo\_20) constitutes major development in landscape impact terms. The proposal is a large-scale urban extension, including employment land, community facilities, and a new vehicular access from the B3179. The enhanced duty on Local Planning Authorities under the Levelling Up and Regeneration Act 2023, together with national planning policy in the National Planning Policy Framework (NPPF) (paragraphs 189–190), makes clear that whether development constitutes “major development” and whether it has the potential to impact a National Landscape (NL) are matters of fact and degree. Such assessments should be made having regard to the scale, character, and likely impacts of the proposal, consistent with the NPPF’s approach to conserving and enhancing valued landscapes. A development of this magnitude:

- Introduces substantial built form, infrastructure, movement, lighting, and activity.
- Represents a fundamental change from rural/undeveloped land to urban use.
- Has effects that extend well beyond the red line boundary. On this basis alone, the allocation meets the threshold of major development in landscape terms. Warranting careful assessment of its effects on the NL and its setting. Land at St John’s (Exmo\_20) - disconnects between evidence and policy response to NL. · Evidence base - Impacts on the setting of the NL are underestimated The ‘Topic Paper SAL – 049 (Rev) Major Development in National Landscapes Second Regulation 19 version’ (October 2025) assessment places disproportionate reliance on the absence of built housing immediately adjacent to the NL boundary. The higher ground adjacent to the NL: · Contributes to its landscape character, openness and visual containment. · Forms part of the wider landscape context that supports the purposes of designation. Development within this setting can: · Be visible from within the NL. · Alter key views, skylines and perceptual qualities such as tranquillity and remoteness. · Introduce an urbanising influence that erodes the transition between designated and non-designated land. These indirect but significant effects are not adequately assessed. · Evidence base - Indicative masterplan provides insufficient certainty ‘Topic Paper SAL – 049 (Rev)

Major Development in National Landscapes Second Regulation 19 version' (October 2025) relies heavily on an indicative masterplan showing no built development close to the NL. However:

- Indicative masterplans carry limited weight and can change.
- Infrastructure such as access roads, drainage, lighting, signage, earthworks and landscaping can themselves have significant landscape effects.
- The allocation policy insufficiently responds to NL Strategic Policy SD01 Land at St John' s (Exmo\_20) explicitly allocates:
  - Around 700 dwellings.
  - Employment land and community facilities.
  - A new primary vehicular access from the B3179. This establishes, in principle, a comprehensive and strategic development whose impacts on the setting of the NL are inevitable, regardless of later design detail. While the policy requires built development to be concentrated in the southern part of the site, the northern and north-eastern areas remain integral to the scheme, accommodating:
    - The primary access road.
    - SANGs and open space.
    - Buffers, landscaping, parking controls and habitat creation. These elements are not landscape-neutral and will introduce:
      - Engineered landform.
      - Movement, noise and visual activity.
      - An urbanising influence along the edge of the NL.
- The extensive safeguards required by the allocation including:
  - Avoidance of street lighting.
  - Structural planting and screening.
  - Retention of buffers.
  - Protection of tranquillity and visual amenity.

demonstrate that the site lies within a highly sensitive landscape context. The need for such controls reinforces the potential for conflict with the purposes of the NL. The 400-metre exclusion zone from the Pebblebed Heaths is primarily an ecological safeguard. It does not prevent landscape or visual harm, nor does it address impacts on character, tranquillity or experiential qualities of the NL. While the allocation requires development to come forward based on an agreed masterplan, this does not provide sufficient certainty to conclude that there will be no significant adverse impact on the purposes of the NL. The masterplan requirement is concerned with:

- Phasing and coordination across land parcels.
- Infrastructure delivery and cost apportionment.
- Design responses to heritage, mineral, biodiversity and access constraints.

In summary, the Policy embeds mitigation measures that insufficiently acknowledge landscape sensitivity and does not guarantee protection of the setting, tranquillity or purposes of the NL. Land at St John' s (Exmo\_20) disconnects between evidence and policy response to the historic environment.

Evidence base – failure to identify combined impacts on heritage setting and setting of the NL

The 'Site Selection report Addendum –Historic Environment Site Assessment Exmouth' (November 2025) assessment repeatedly describes the Grade II\* Church of St John in the Wilderness's setting using language that directly overlaps with the purposes and special qualities of the NL including:

- tranquillity,
- remoteness,
- openness,
- undeveloped countryside,
- dark skies,
- rising landform and wooded horizons.

Crucially:

- The north and north-east of the church, identified as sensitive to heritage harm are also the areas that:
  - o lie closest to the NL; and
  - o contribute to its setting,

However, the 'Site Selection report Addendum –Historic Environment Site Assessment Exmouth' (November 2025) assessment does not sufficiently recognise that the

church's setting is functionally and perceptually linked to the setting of the NL. The absence of explicit reference to the NL in the heritage conclusions underplays the combined sensitivity of this location and weakens the evidence and policy response. · Policy requirements provide insufficient certainty Strategic Policy SD01 Land at St John's (Exmo\_20) relies heavily on future master-planning to address impacts on the setting of the Grade II\* Church of St John in the Wilderness. However, the 'Site Selection report Addendum –Historic Environment Site Assessment Exmouth' (November 2025) identifies location specific sensitivity, including land where development would harm the church's setting through loss of openness and tranquillity. Strategic Policy SD01 Land at St John's (Exmo\_20) requires an agreed masterplan, but: · It does not define fixed no-development areas around the church. · It does not translate the sensitivity mapping into policy constraints. · It does not link housing numbers to heritage or landscape capacity. · It does not require an integrated heritage landscape assessment to inform the masterplan. In summary, the masterplan is in danger of being a substitute for policy clarity, rather than a mechanism for implementing it. Summary of Objection · Exmo\_20 is a major development in landscape terms. · Landscape Impacts: Policy and evidence understate potential impacts on NL character, tranquillity, and visual quality. · Heritage Impacts: Policy fails to adequately protect the Grade II\* church's setting or its interaction with the NL. Conclusion Policy SD01 fails to provide adequate protection to the landscape and heritage setting and does not demonstrate compliance with national planning policy regarding major development in landscape terms and the setting of the NL.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter 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.:** Delete Exmo\_20

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)