

East Devon Local Plan – Topic Paper SAL – 049 (Rev)

Major Development in National Landscapes

Second Regulation 19 version



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Contact details

Planning Policy Team
East Devon District Council
Blackdown House, Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

Phone: 01395 516551

Email: planningpolicy@eastdevon.gov.uk

<http://eastdevon.gov.uk/planning/planning-policy/>

Front cover photograph taken by EDDC officer from Fire Beacon looking south over the Sid Valley.

To request this information in an alternative format or language please phone 01395 516551 or email csc@eastdevon.gov.uk

Contents

1. Introduction	6
2 Summary of National Policy and duty to ‘further the purposes’	9
3 The East Devon Context	13
4 Identifying ‘Major Development’ in the National Landscapes of East Devon	19
5 The ‘Exceptional Circumstances’ Assessment.....	21
6. Summary of results.....	24
7. Broadhembury Context Summary and duty to further the purpose.	27
7.1 Major Development Assessment Brhe_09.....	29
8. Budleigh Salterton Context, Summary and duty to further the purpose.....	34
8.1 Major Development Assessment Budl_02	36
8.2 Exceptional Circumstances Assessment Budl_02	41
9. Dunkeswell Context, Summary and duty to further the purpose.....	42
9.1 Major Development Assessment Dunk_05	45
10. East Budleigh Context, Summary and duty to further the purpose.....	50
10.1 Major Development Assessment Ebud_01	52
10.2 Exceptional Circumstances Assessment Ebud_01	57
11. Exmouth Context, Summary and duty to further the purpose.....	58
11.1 Major Development Assessment Exmo_17	64
11.2 Exceptional Circumstances Assessment Exmo_17.....	69
11.3 Major Development Assessment Exmo_18.....	71
11.4 Major Development Assessment Exmo_20	76
12. Honiton Context and Summary.....	82
12.1 Major Development Assessment for Honi_07.....	87
12.2 Exceptional Circumstances Assessment Honi_07	93
12.3 Major Development Assessment for Honi_13	95
12.4 Exceptional Circumstances Assessment Honi_13	100
12.5 Major Development Assessment for Honi_18	102

12.6	Exceptional Circumstances Assessment Honi_18	107
12.7	Major Development Assessment for GH/ED/39b.....	109
12.8	Major Development Assessment for Gitti_05.....	115
13.	Kilmington	120
13.1	Major Development Assessment for Kilm_09b and Kilm_10	122
14.	Musbury	126
14.1	Major Development Assessment for Musb_01a.....	128
15.	Newton Poppleford.....	133
15.1	Major Development Assessment for Newt_04 and Newt_05.....	136
15.2	Exceptional Circumstances Assessment Newt_04 and Newt_05.....	141
16.	Otterton	143
16.1	Major Development Assessment for Otto_01.....	146
16.2	Exceptional Circumstances Assessment Otto_01.....	151
17.	Sidbury.....	153
17.1	Major Development Assessment for Sidm_34.....	156
17.2	Exceptional Circumstances Assessment.....	161
18.	Sidmouth.....	163
18.1	Major Development Assessment for Sidm_01	167
18.2	Exceptional Circumstances Assessment Sidm_01.....	172
18.3	Major Development Assessment for Sidm_06a.....	174
18.4	Exceptional Circumstances Assessment for Sidm_06a	179
18.5	Major Development Assessment for Sidm_31	181
19.	Tipton St. John	186
19.1	Major Development Assessment for Otry_04	189
20.	Appendix A Extracts from the 2025 - 2030 East Devon NL Management Plan	193
21.	Appendix B Extracts from 2025 - 2030 Blackdown Hills Management Plan and Appendices	197
22.	Appendix C – Form 1: East Devon National Landscape Major Development Assessment Form	203
23.	Appendix D – Form 2 Blackdown Hills National Landscape Major Development Assessment Form.....	205
24.	Appendix E – Form 3: Assessment of Exceptional Circumstances	208

25. Appendix F Blackdown Hills National Landscape Partnership Representation209

1. Introduction

- 1.1 This topic paper sits behind and supports the second Regulation 19 version of the East Devon Local Plan 2020-2042. 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. This topic paper updates² the topic paper that supported the first Regulation 19 plan and takes account of representations made during that consultation. The main change from the previous topic paper is the addition of text relating to the requirement introduced by the Levelling-up and Regeneration Act 2023 (LURA) that authorities ‘seek to further’ the statutory purposes of protected landscapes³. This reflects representations received from Natural England and the East Devon and Blackdown Hills National Landscape partnerships that questioned whether the overall approach to allocations meets that duty. The topic paper has been updated to include an assessment of the potential of each site to meet the duty to further the purposes, including recommended actions for how the local plan can facilitate this. The topic paper also addresses the detailed comments of the Blackdown Hills National Landscape as set out in Appendix F. The assessment of major development criteria for height of buildings has been amended in the Blackdown Hills to reflect comments from the national landscape team that houses over 2 stories are unlikely to be compatible with the character of the Blackdown Hills. Several of the sites under consideration have planning applications pending and these have been referenced in the summary of each settlement. Two sites are no longer allocated (Axmi_01a and Honi_12).
- 1.2 The identification of major development within a national landscape in the context of the NPPF is subject to interpretation by decision makers, allowing them to factor in local considerations. 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

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

² Maps used in this paper are based on the allocations included in the first Regulation 19 plan, some of which are no longer proposed for allocation.

³ The statutory purpose of National Landscapes is the conservation and enhancement of natural beauty

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 has the potential to have an 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. Applications for development in (or outside but affecting its setting or appearance) a national landscape will be assessed against Policy OL02 of the local plan. This states that the highest level of protection will be given to the landscape and scenic beauty of the national landscapes and that development will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL. Policy OL02 also states that major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest. The work undertaken to support local plan allocations may be relevant to these determinations but will not remove the need to assess individual applications in relation to policy OL02.

- 1.3 All sites within or adjacent to a national landscape have been included in the assessments in this topic paper. 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 assessments on a settlement by settlement basis in alphabetical order. Appendices include

relevant extracts from the Blackdown Hills Management Plan and East Devon Planning Guidance and the template assessment forms. Since the first version of this document, both national landscape management plans have been updated. The 2025 – 2030 East Devon management plan⁴ was adopted in July 2025 and the 2025 – 2030 Blackdown Hills management plan⁵ has been agreed with Natural England and adopted by East Devon District Council. The sections of the management plans that four of the criteria in the assessment for major development were based on have been amended as part of the review process. In the case of the EDNL there has been no significant change to the criteria used and references in the footnote have just been updated to the most recent version of the management plan. In the case of the BHNL, some of the references used to set the criteria are not repeated in the same manner in the new management plan, but the overall assessment has not changed significantly enough to warrant a revision of the criteria and so the footnote links to the previous document.

- 1.6 The site assessment work⁶ and sustainability appraisal⁷ undertaken to inform the local plan allocations provides evidence to underpin this paper.

⁴ [freecompress-EDNL Management Plan 2025-2030 FINAL Version_Compresed.pdf](#)

⁵ [Management plan - Blackdown Hills National Landscape](#)

⁶ [Evidence and Examination Library - Site Allocations \(SAL\) - East Devon](#)

⁷ [Evidence and Examination Library - Core Submission Documents \(CSD\) - East Devon](#)

2 Summary of National Policy and duty to ‘further the purposes’

- 2.1 All references to the NPPF are to the December 2023 version⁸, under which the local plan will be examined (although noting that this was consistent with the 2024 version in respect of National Landscapes, with the updating of AONB’s to NL’s being the only change). 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

⁸ [\[ARCHIVED CONTENT\] National Planning Policy Framework - GOV.UK](#)

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 statutory purposes of Protected Landscapes, but now they must ‘seek to further’ these. The ‘purposes’ referred to in relation to a national landscape are ‘conserving and enhancing natural beauty’. National guidance⁹ on this duty was published in December 2024. This states that: “The duty does not prevent relevant authorities from undertaking their statutory functions and discharging their legal duties and other responsibilities. The duty is intended to complement these requirements by ensuring that the purposes for which Protected Landscapes are designated are recognised in reaching decisions and undertaking activities that impact these areas. Consideration of what is reasonable and proportionate in the context of fulfilling the duty is decided by the relevant authority and should take account of the context of the specific function being exercised”. For plan making purposes, the guidance states that the planning authority should consider whether the purposes of the Protected Landscape can be furthered through measures embedded in the design of plans and proposals, where reasonably practical and operationally feasible. Recent High Court judgments¹⁰ that interpret how the ‘duty to further’ should be applied in a planning context have also been taken into account in this revised topic paper through identifying whether an allocation would conflict with the duty, justifying all allocations (not just those considered to constitute major development) and identifying mitigation measures to be included in plan allocation policy. This paper provides clear and positive reasoning to demonstrate how the duty has been discharged.

- 2.5 Local planning authorities have a statutory duty to produce a local plan¹¹ and the NPPF requires plans to make sufficient provision for housing and employment. East Devon is required to make provision in the local plan to meet the housing requirement set by central government. Early in the plan making process, strategic options for where housing and other development should be located were considered as set out in the sustainability appraisal¹². The option chosen was to locate most development in the ‘West End’, with a high proportion at Principal and Main Centres and a low proportion at Local Centres and Service Villages. Four alternative strategies were considered and two of these options were rejected partly due to the potential impact on the national landscapes. The option of having

⁹ [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/seeking-to-further-the-purposes-of-protected-landscapes)

¹⁰ [CPRE and New Forest National Park Authority](#)

¹¹ [Planning and Compulsory Purchase Act 2004](#)

¹² [CSD-003 Evidence and Examination Library - Core Submission Documents \(CSD\) - East Devon](#)

a higher concentration of housing in the West End of East Devon with less in the rest of the district (which would have minimised development close to or inside the national landscapes) was rejected. This was because it would limit the ability of existing settlements in East Devon to meet their own housing need, would adversely affect town centres, and would likely result in a higher loss of greenfield land. It is a geographical fact that most of the major settlements in East Devon are located close to one of the national landscapes and in some cases completely within them. A plan strategy which prohibited development in the national landscapes would mean that many settlements would not be able to grow to meet their own needs and those of the surrounding countryside and smaller settlements. In accordance with the guidance on national landscapes the local plan has taken a proportionate approach that focusses new housing and employment away from the national landscapes and particularly away from the most rural parts of the national landscapes whilst allowing the main settlements to grow to meet local needs.

- 2.6 This paper includes an assessment of opportunities to conserve and enhance natural beauty for each site together with any actions that would help achieve this through local plan policy. Developing sites will always result in a change to the appearance of that specific site, but the impacts on the wider national landscape are likely to vary significantly. The development of the allocation in Musbury is likely to result in tangible enhancements to the natural beauty of the site, although improvements to the wider national landscape context would be limited. Allocations at Dunkeswell, Kilmington and Tipton St. John are well contained within a settlement and would be likely to have a fairly neutral impact on the natural beauty of the national landscape. The majority of sites are located on greenfield sites at the edge of settlements. Such sites are more likely to change the character of parts of the national landscape, but this does not mean that the change would be a negative one that did not conserve and enhance its natural beauty. Some of the allocation sites are in areas where there has been significant loss of hedgerows and other natural features. Development can secure the reinstatement of such features together with open space and biodiversity net gain enhancements which are delivered through housing development. By studying the landscape character assessments¹³ and their planning aims it is possible to identify appropriate features for incorporation within a development.
- 2.7 It is considered that each local plan allocation in the second Regulation 19 plan can be justified in relation to the national landscapes. This is because the scale of development is

¹³ [East Devon and Blackdown Hills Landscape Character Assessment](#)

compatible with the related settlement and its national landscape setting, and policies are in place to secure an appropriate design. However, it will still be necessary to show that individual developments meet the duty through the development management process.

3 The East Devon Context

3.1 There are three separate national landscape designations in East Devon that take up around 57% of the District's 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.

- 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 guidance¹⁴ on how to define and assess major development within it. The special qualities of the East Devon National Landscape (EDNL) are set out in the 2025 – 2030 Partnership Plan¹⁵. The EDNL 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 are reproduced in Appendix A. The vision for 2050 is a 'wilder' landscape with the main strategic focus being to restore nature and reverse biodiversity loss through the use of nature-based solutions. The 2025-2030 partnership plan highlights that the special qualities of the national landscape have been shaped by natural processes and thousands of years of human activity to create a landscape of exceptional beauty with recreational, cultural and spiritual qualities with an extensive network of paths and access land providing opportunities for recreation, healthy exercise, or an escape to tranquillity and relative isolation.
- 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 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 and guidance on major development are set out in the Appendix¹⁶ to the 2019 – 2024 Blackdown Hills Management Plan¹⁷: relevant extracts are reproduced in Appendix B.
- 3.5 An updated landscape character assessment¹⁸ of East Devon and the Blackdown Hills was published by East Devon District Council, working with Devon County Council, the Blackdown Hills AONB partnership and the East Devon AONB partnership. Landscape Character Assessment is a tool to help understand what the landscape is like today, how it

¹⁴ [Blackdown Hills National Landscape Management Plan 2025-2030 Pre-Consultation draft version for local authorities](#)

¹⁵ [ednl-management-plan-2025-2030-public-consultation-version.pdf](#)

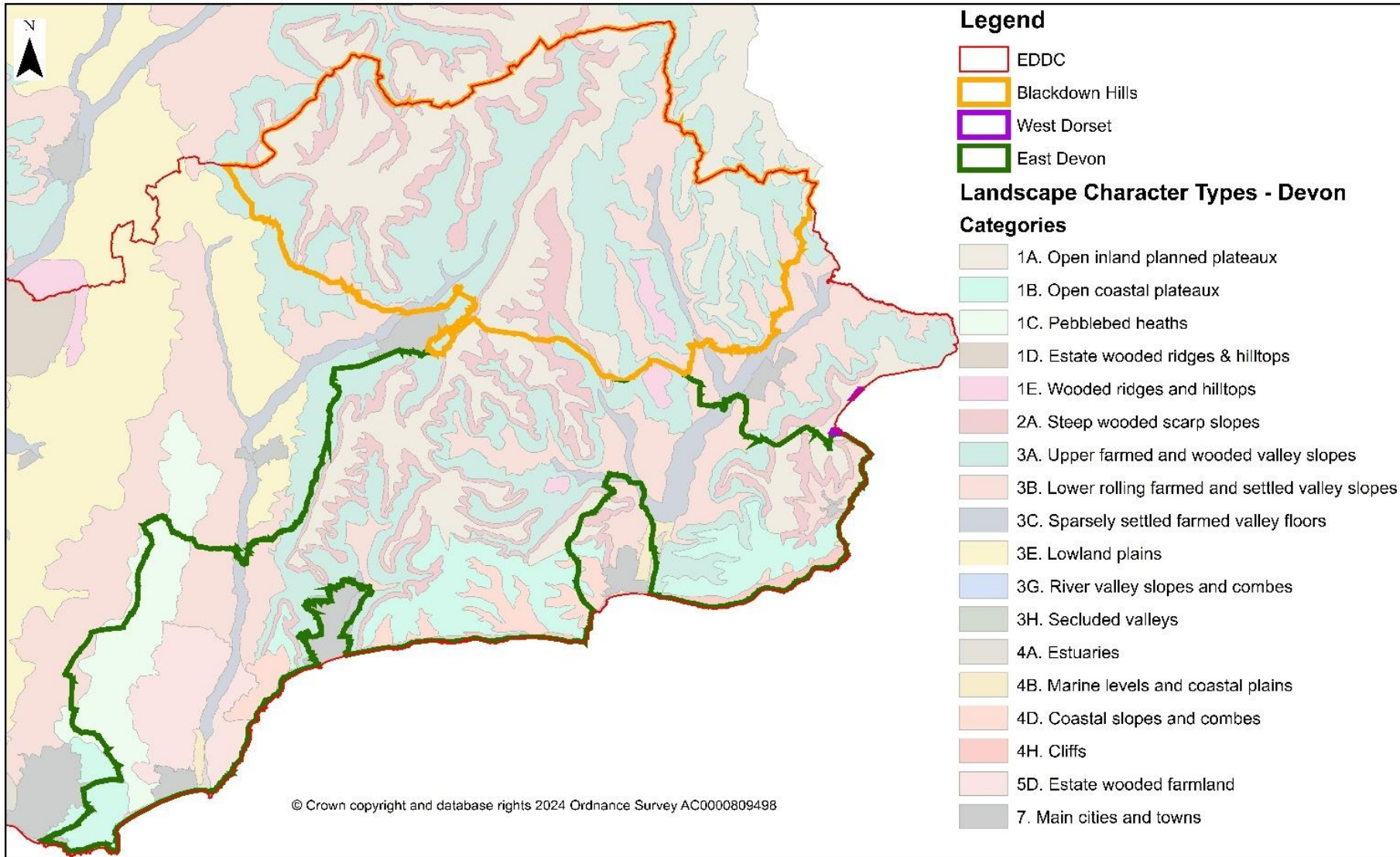
¹⁶ [Blackdown Hills National Landscape Management Plan 2025-2030 Pre-Consultation draft version for local authorities](#)

¹⁷ [bhaonb_management_plan_2019-24.pdf](#)

¹⁸ [Cover front.indd \(eastdevon.gov.uk\)](#)

came to be like that, and how it may change in the future. The assessment identifies areas with a certain character profile, describes their key characteristics and identifies 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.

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 Guidance¹⁹ 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: these are summarised in Section 3 of this topic paper. 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 guidance²⁰ 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

¹⁹ [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/442222/areas_of_outstanding_natural_beauty_aonbs_designation_and_management.pdf)

²⁰ Natural England [guidance](#) on meeting beauty criteria for national landscape designation

considered to constitute ‘major’ development under this criterion. The blank template used for the EDNL is included in Appendix C and for the BHNL in Appendix D.

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 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, Lypstone, 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).

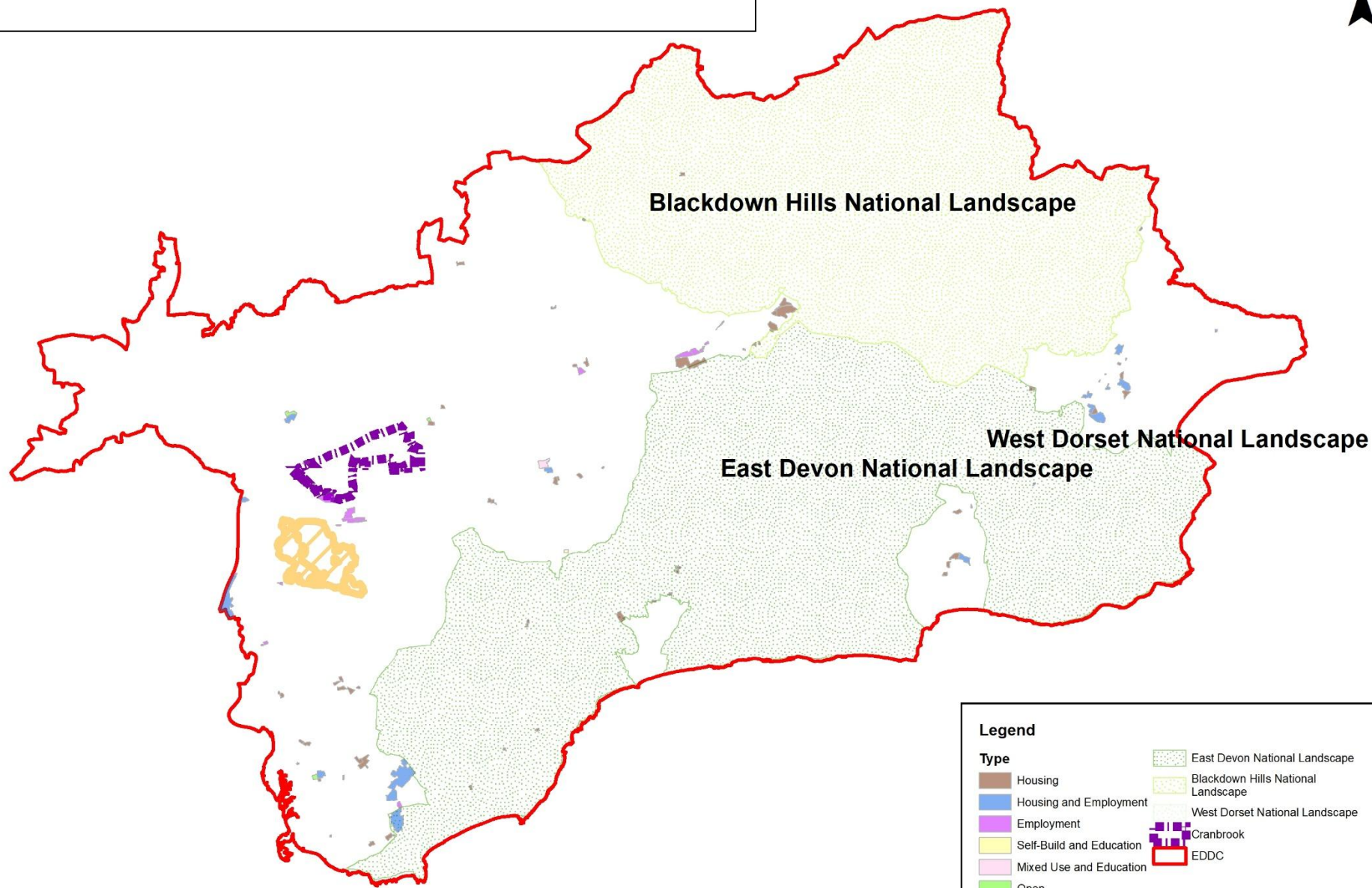
- 5.4 The agreed assessment process allows for the cumulative impact of sites that affect national landscapes to be taken into account. For example, if there were several suitable and available sites around a Tier 4 settlement that would result in more than 'limited development to meet local needs', 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 making²¹.
- 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.

²¹ [Evidence and Examination Library - Site Allocations \(SAL\) - East Devon](#)

6. Summary of results

- 6.1 Allocations in the second Regulation 19 plan make provision for around 6,000 new homes, with the new town of Marlcombe delivering around 3,300 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 There are 84 housing allocations as indicated on Map 3: Proposed allocations in Second Regulation 19 Local Plan. 14 allocations are wholly within a national landscape and these account for 836 new homes, which is around 6% of the number of homes planned through allocations.
- 6.3 All sites within or adjacent to a National Landscape have been assessed as to whether they constitute major development for the purpose of NPPF paragraph 183
- 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 Second Regulation 19 Local Plan



Legend



Type	
	Housing
	Housing and Employment
	Employment
	Self-Build and Education
	Mixed Use and Education
	Open
	New Community
	East Devon National Landscape
	Blackdown Hills National Landscape
	West Dorset National Landscape
	Cranbrook
	EDDC

Table 1: Summary of major and exceptional circumstances assessments

Settlement	Site	Scale	National Landscape	Major	Planning App.	Exceptional Circumstances?
Broadhembury	Brhe_09	10 dwellings	Adj. Blackdown Hills	No	No	N/A
Budleigh Salterton	Budl_02	35 dwellings	In East Devon	Yes	Yes	Yes
Dunkeswell	Dunk_05	43 dwellings	In Blackdown Hills	No	No	N/A
East Budleigh	Ebud_01	15 dwellings	In East Devon	Yes	No	Yes
Exmouth	Exmo_17	410 dwellings/1.6 ha emp	In East Devon	Yes	EIA screening EIA scoping	Yes
Exmouth	Exmo_20a	700 dwellings/2 ha emp	Adjacent East Devon	No	No	N/A
Exmouth	Exmo_18	2.7 ha employment	Adjacent East Devon	No	No	N/A
Honiton	Honi_07	30dwellings	In Blackdown Hills	Yes	No	Yes
Honiton	Honi_13	10 dwellings	In Blackdown Hills	Yes	No	Yes
Honiton	Honi_18	136 dwellings	Adj. Blackdown Hills	Yes	No	Yes
Honiton	Gitti_05	310 dwellings	Partly In East Devon	No	No	N/A
Honiton	GH/ED/39b	up to 300 dwellings	Adj. Blackdown Hills	No	EIA screening	N/A
Kilminster	Kilm_09/Kilm_10	28 dwellings	In East Devon	No	No	N/A
Musbury	Musb_01a	15 dwellings/0.06 ha emp	In East Devon	No	No	N/A
Newton Poppleford	Newt_04/Newt_05	40 dwellings	In East Devon	Yes	No	Yes
Otterton	Otto_01	10 dwellings	In East Devon	Yes	No	Yes
Sidbury	Sidm_34	43 dwellings	In East Devon	Yes	Yes	Yes
Sidmouth	Sidm_01	127 dwellings	In East Devon	Yes	No	Yes
Sidmouth	Sidm_06a	15 dwellings	In East Devon	Yes	No	Yes
Sidmouth	Sidm_31	15 dwellings	In East Devon	No	Yes	N/A
Tipton St. John	Otry_04	Primary school/5 dwellings	Adj. East Devon	No	No	N/A

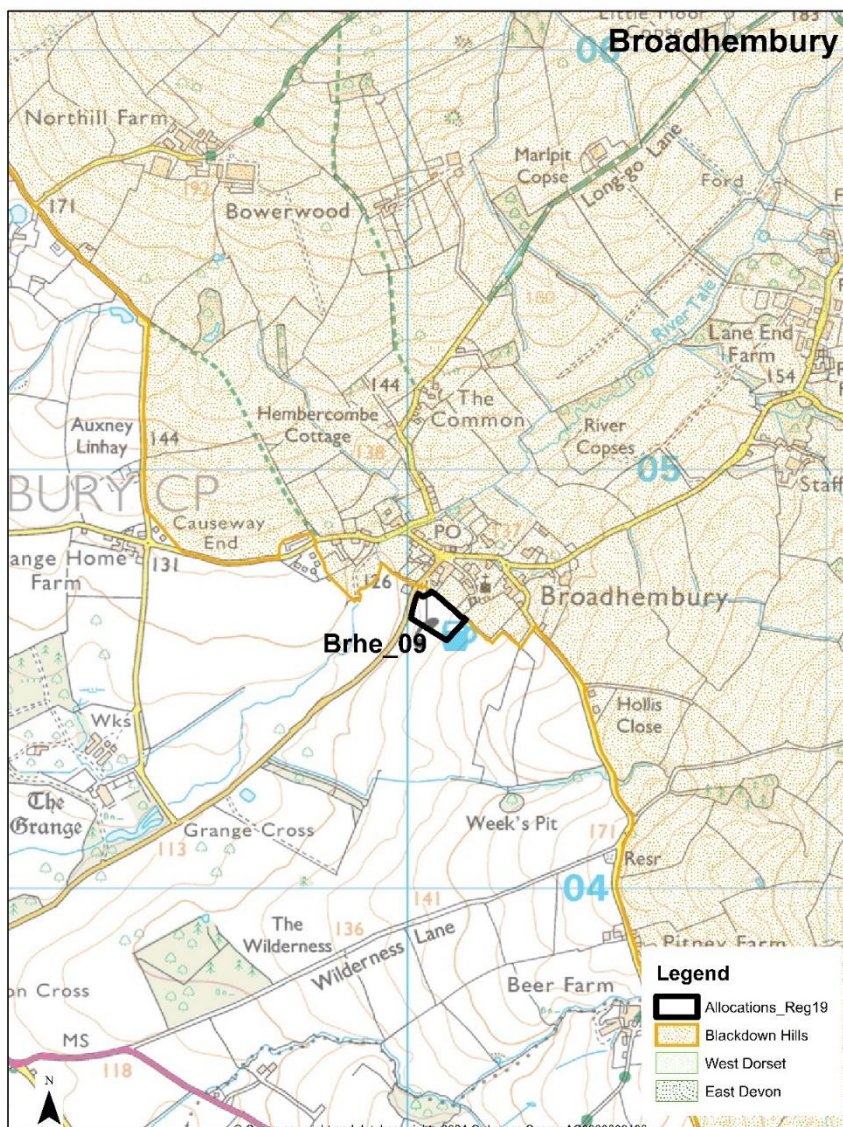
7. Broadhembury Context Summary and duty to further the purpose.

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. Development of the site could result in limited conflicts with the purpose of conserving and enhancing the natural beauty of the BHNL as identified in the assessment. The allocation is justified in the context of the local plan strategy to allow limited development in Broadhembury, where all other potential allocation sites are located within the national landscape and would have a greater impact on its special qualities.

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



The potential of Brhe_09 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty is set out in the table below, together with how the local plan can help to deliver this.

Site	Opportunities to conserve and enhance natural beauty	Actions
Brhe_09	The site forms the northwestern corner of a large field which gently slopes up towards the village. Although it is just outside, and adjoining, the National Landscape, there is no obvious differentiation between this site and the wider landscape, the whole area is of high scenic quality with no obvious intrusive elements, but the site is opposite a modern village hall and car park. The site is seen in the wider context of the NL on the	Policy wording already refers to the National Landscape setting and the need to ensure that the development is informed by detailed assessment and design work. This could be expanded to add

Site	Opportunities to conserve and enhance natural beauty	Actions
	<p>village approach but is also seen against the backdrop of mature trees and hedgerows with the Church tower visible beyond.</p> <p>Policy SD12 allocates the site for 10 houses but recognises the location’s particular heritage and landscape sensitivities and requires detailed assessment and design work to ensure that the design respects the special character of the area. It also recognises the importance of being located on the edge of the NL and requires appropriate boundary screening to ensure that new development conserves the special character of the area. The Devon Historic Environment Record shows that the site forms part of an area where there has been field boundary loss of 70%. As the larger field was historically made up of numerous small field parcels, a pattern which reflects the wider character of the NL, there is an opportunity to reinstate a natural hedge boundary around the site, enhancing the setting of the village. The reintroduction of a hedgerow would be compatible with the aims of the LCT 3A: Upper farmed and wooded valley slopes. The relatively low density of the site also allows the design to be flexible and create a layout which incorporates a high degree of screening and landscaping.</p>	<p>that this is needed to conserve and enhance the natural beauty of the site and its wider landscape setting. The design work should incorporate an assessment of appropriate dwelling heights for this historic village and the wider character of the Blackdown Hills.</p> <p>Policy requires appropriate boundary screening to ensure that new development conserves the special character of the area, however this could be strengthened by requiring a hedgerow of native species reinstating the historic field boundary (noting though that access will need to be achieved and this might reduce its length).</p>

7.1 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

Brhe_09 Landscape Character Type	
5. Nature of development ²²	Housing –predominantly two storey (8.5m to ridge)..
6. Scale of development ²³	<p>10 dwellings.</p> <p>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%.</p>
7. Setting	The site lies within LCT 3A: Upper farmed and wooded valley slopes. Key features of this landscape exhibited on the site and its surroundings are a small, intimate,


²² Criteria 5, 6 and 7 are taken from the footnote to the NPPF

²³ 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>settled landscape with a patchwork of irregular fields, woodland, winding lanes and small villages. Landscape aims for this LCT include retaining and enhancing the structure of small fields. The site allocation can help to facilitate this through the reinstatement of hedges.</p> <p>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.</p>
8. Isolation ²⁴	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 ²⁵	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 well treed backdrop with the church tower seen beyond and no modern detractors.
14. Relative wildness	Low impact - the site has low levels of wildness, being part of a managed landscape at the edge of a village.


²⁴ Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) 'The Special Landscape Character'

²⁵ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

15. Relative tranquillity	Medium/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. The 1889-1912 and earlier OS maps show that the larger field (of which the site forms the north western part) was historically subdivided into smaller fields, bounded by hedgerows. At some point (before the 1932-1939 OS map) these were removed but could be reinstated around the site as part of enhancement works.
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? ²⁶	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. The larger agricultural field was once several smaller field parcels and there is an opportunity to reinstate a field boundary hedgerow around the site.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined? ²⁷	No
20. Photos	 <p>Site is filtered from view on approaching the village by trees and hedges.</p>

²⁶ See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf \(blackdownhillsaonb.org.uk\)](#)

²⁷ Blackdown Hills [Management Plan](#) and extract of page 19 in Appendix 2

	 <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, the scale of development would be around 10% of the current number of dwellings in the main village.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>No. 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>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>

8. Budleigh Salterton Context, Summary and duty to further the purpose.

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

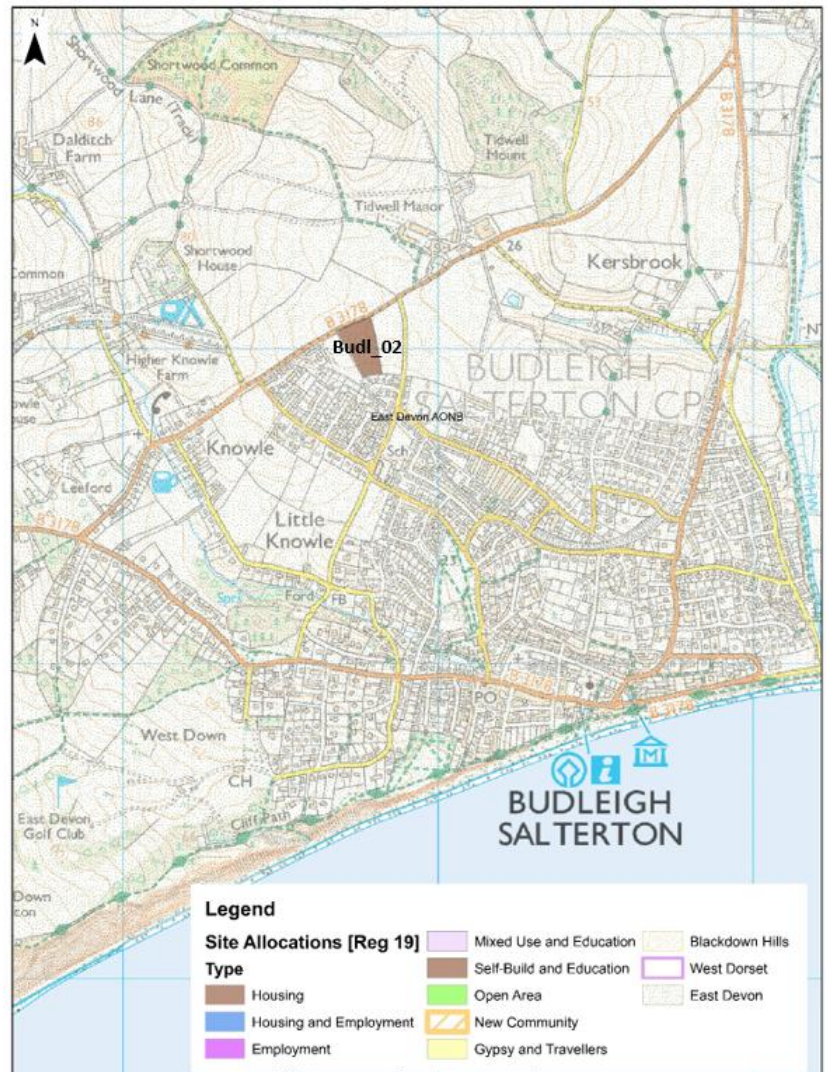
Five sites were considered to be reasonable alternatives for housing allocations. One site is allocated for 35 dwellings, Budl_02. A planning application for 35 dwellings is pending (25/0086/MFUL)

Budl_01 and Budl_03 were rejected largely on landscape grounds. Budl_05 has a capacity for less than 5 dwellings 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.

Development of the site could result in conflicts with the purpose of conserving and enhancing the natural beauty of the EDNL as identified in the assessment, but these can be mitigated to a large extent. The potential of Budl_02 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty is set out in the table below, together with how the local plan can help to deliver this.



Site	Opportunities to conserve and enhance natural beauty	Actions
BudL_02	<p>The town of Budleigh Salterton is the largest settlement located wholly within the EDNL. The Devon Historic Environment Record shows the historic landscape character of BudL_02 and the field to the east as relatively large, regular enclosures likely to have been laid out between C15th-C18th following earlier the medieval field pattern. Historical mapping shows no changes to the field boundaries since the 19th Century.</p> <p>BudL_02 is located on the northeastern edge of the town. The site comprises a single low-lying field with existing modern residential development situated immediately to the south and west. Site boundaries comprise trees and high hedges to the south, east and west which, together with mature trees and hedges in the wider landscape, provide relatively good screening from public views in those directions. The northern site boundary adjacent to the B3178 is open to views from the road frontage and limited locations on rights of way on higher ground in the National Landscape to the north. Additional native tree and hedge planting would be required to provide screening along the road frontage. Existing hedges should be retained and enhanced and adequate buffers provided between them and private curtilages.</p> <p>A high standard of design and use of appropriate materials reflecting local distinctiveness is required commensurate with the location within the National Landscape. This should include avoiding the introduction of street lighting along the B3178.</p>	<p>Policy SD08 notes that the site is located inside the East Devon National Landscape area, requiring a sensitive design approach to minimise adverse landscape and visual impacts and should also reference the need to conserve and enhance the natural beauty of the site and its wider landscape setting.</p> <p>Policy requires provision of safe and convenient foot/cycle path access to the Budleigh primary school and for significant care to avoid adverse impacts on Tidwell House, which is Grade II* listed.</p> <p>An additional criterion could be introduced regarding building design, to ensure that new development conserves and enhances the special character of the wider area rather than the more modern and generic design of housing around the site.</p>

8.1 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

Budl_02 Landscape Character Type	
5. Nature of development ²⁸	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 ²⁹	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 lies within LCT 5D: Estate wooded farmland and forms the wider farmland setting of the Bicton estate. Key characteristics of this site include pastoral farmland with areas of arable cultivation, winding rural roads and fields enclosed by wildflower rich banks and mixed hedges. A likely cause of change

²⁸. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

²⁹ 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>identified is the erosion of distinctive character of settlements and their landscape setting. The landscape guidelines include new buildings being sympathetic to existing buildings.</p> <p>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.</p>
8. Coastal scenery ³⁰	No impacts.
9. Heathland commons	No impacts
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 ³¹	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/ medium impact - the adjoining housing and traffic on the adjacent B3178 restrict levels of tranquillity. Street lighting could impact on perception of dark skies.
16. Natural heritage features	Medium impact - there are mature trees and hedges to some boundaries. Extensive boundary planting would be required particularly along the roadside.
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

³⁰ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

³¹ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

	<p>setting, but this impact could be mitigated through careful design and landscaping.</p>
<p>18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?</p>	<p>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.</p>
<p>19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?</p>	<p>No</p>
<p>20. Photos</p>	<div data-bbox="491 864 1453 1198" data-label="Image"> </div> <p data-bbox="502 1218 995 1249">Looking south from field access to B3178</p> <div data-bbox="491 1285 1417 1637" data-label="Image"> </div> <p data-bbox="507 1653 1075 1684">View from northern site boundary along B3178</p>

21. Would allocation constitute major on one criterion?	Yes, criteria 11, 12, 13 and 17.
22. Would allocation constitute major with any combination of criteria?	Yes
23. Major development?	Yes

8.2 Exceptional Circumstances Assessment Budl_02

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Budl_02
Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?	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. 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 Lymptone and 27% at Woodbury). The scale of development is below the level that would be expected through the plan strategy alone.
Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?	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.
Are there any cumulative impacts on the national landscape from other proposed allocations?	No, only one allocation is proposed in Budleigh Salterton.
What is the predicted landscape impact? Can any detrimental impacts be mitigated?	The landscape is sensitive to change, but detrimental impacts can be mitigated to some extent.
What is the predicted environmental impact? Can any detrimental impacts be mitigated?	Ecological impacts are minimal, and no other environmental impacts are noted.
Are there any 'exceptional circumstances' that would justify development in the 'public interest'.	Yes 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.

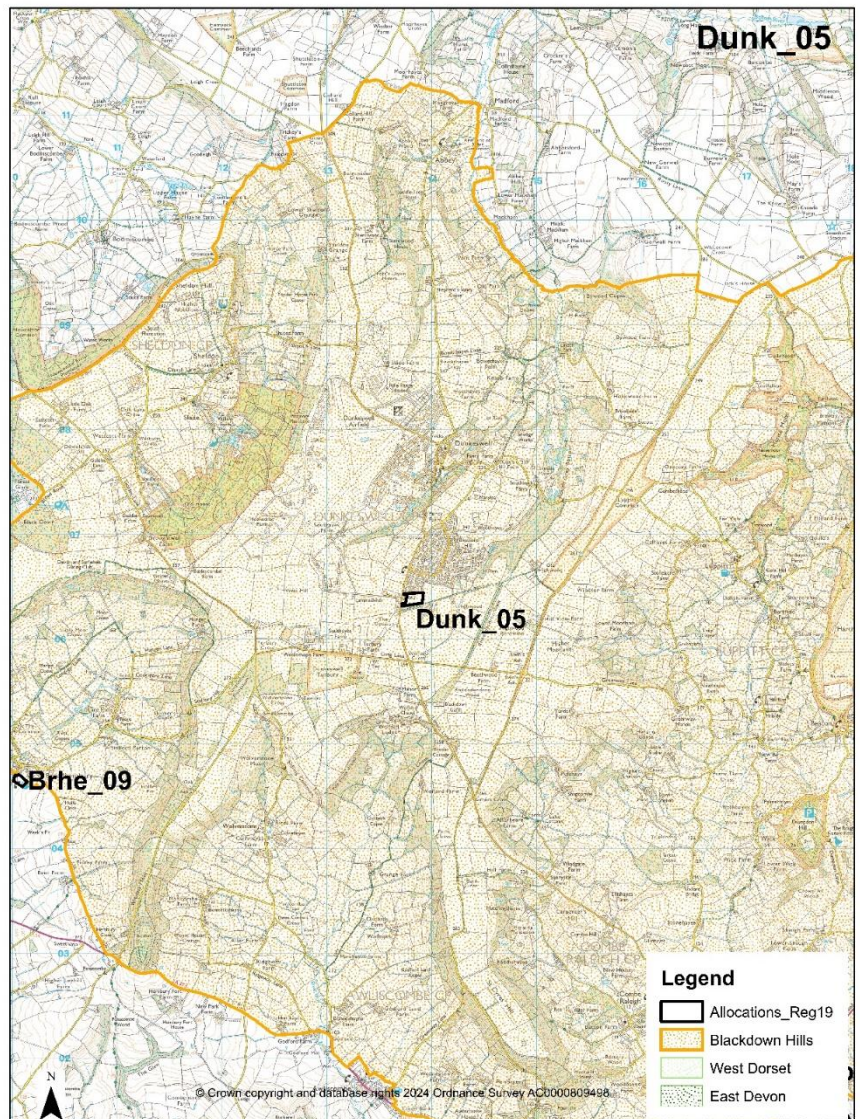
9. Dunkeswell Context, Summary and duty to further the purpose.

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.

Development of the site could result in very limited conflicts with the purpose of conserving and enhancing the natural beauty of the BHNL as identified in the assessment. However, these impacts could be mitigated and the allocation is justified in the context of the local plan strategy to allow limited development in Dunkeswell, where all other potential allocation sites are also located within the national landscape and would have a greater impact on its special qualities. The allocation is not considered to constitute major development in the context of the national landscape.

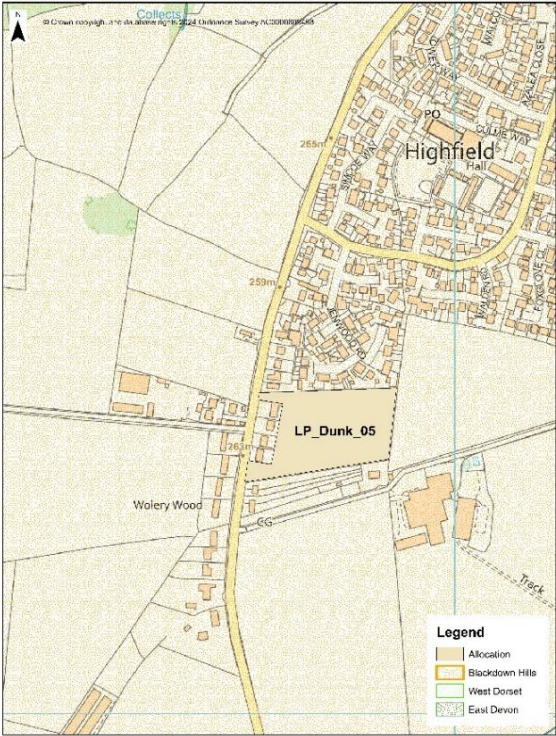

The potential of Dunk_05 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty is set out in the table below, together with how the local plan can help to deliver this.

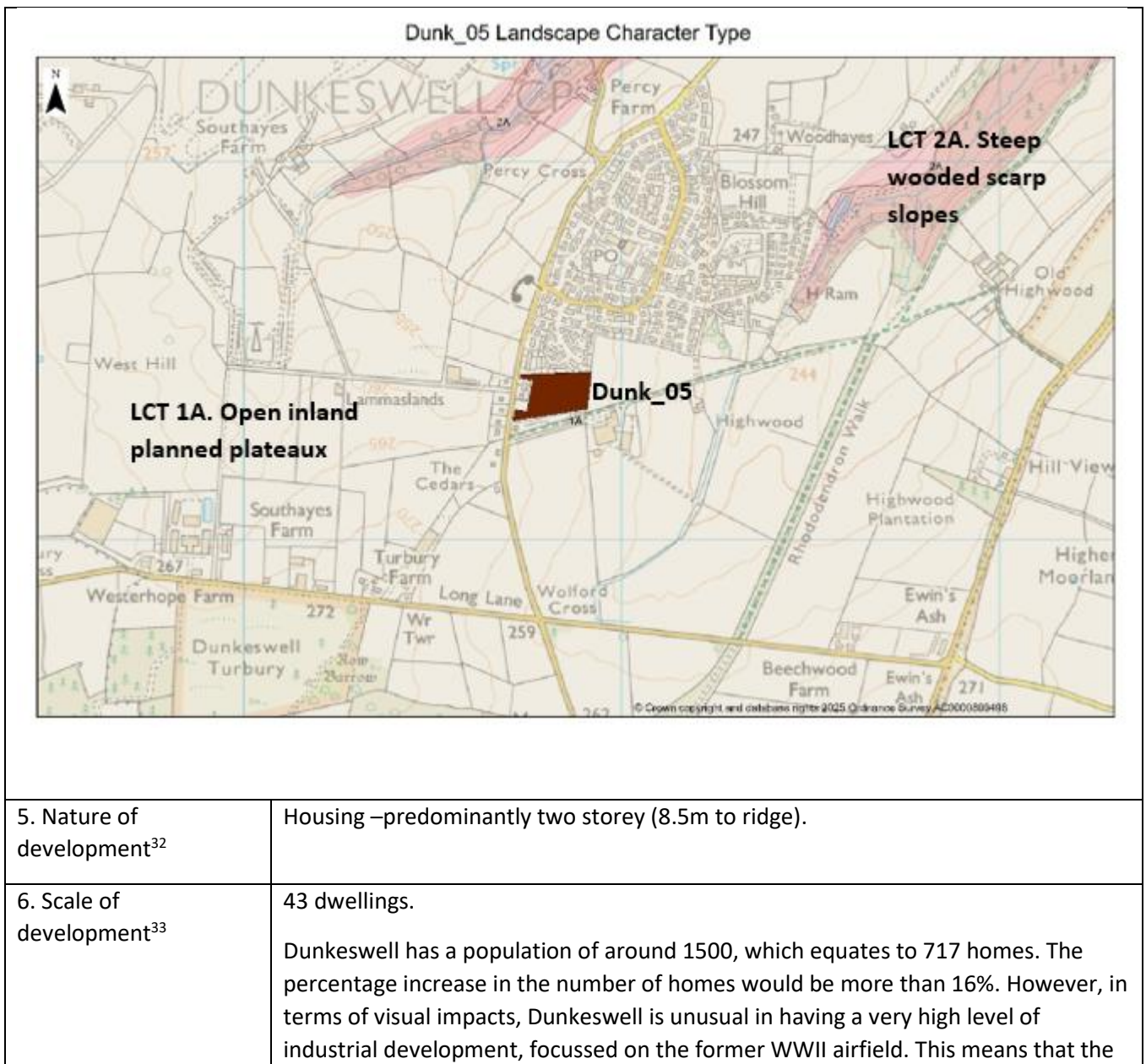


Site	Opportunities to conserve and enhance natural beauty	Actions
Dunk_05	<p>The site consists of a former sports field, well screened on all sides by existing development or very well established hedges and mature trees. The field boundary has remained unchanged since the 19th Century, apart from the incursion of housing fronting the main road. The site lies entirely within the National Landscape on a level plateau and, whilst it is glimpsed in long range views, it is seen against a backdrop of post war development.</p> <p>Dunkeswell comprises three distinct groups of development- the industrial estate on the old airfield, the historic village, and the modern, Highfield housing estate, which is the entry point to Dunkeswell for most visitors and was formerly used as part of a World War Two military base. Currently the approach to this part of the village is characterised by a loose ribbon of post war dwellings with no particular vernacular.</p> <p>The allocation site is located at the main entrance to Highfield and so there is an opportunity to create a distinctive ‘gateway’ development. On balance, it is considered that an unobtrusive, well screened, development would better enhance and conserve the character of the NL and so a gateway development is not proposed.</p> <p>Policy SD15 allocates the site for 43 houses but does not identify any particular design or layout requirements (beyond including a pedestrian link and protecting mature trees around the site). The site is unobtrusive in the landscape and development is likely to be much less visible than the majority of the</p>	<p>Policy wording should be amended to refer to the importance of the National Landscape setting and the need to ensure that the development is informed by detailed assessment and design work in order to conserve and enhance the natural beauty of the site and its wider landscape setting.</p> <p>Policy requires a new pedestrian link to local facilities and the protection of the ancient trees which adjoin the site and these requirements should be retained as they will help to conserve the character of the NL.</p> <p>An additional criteria could be introduced regarding building design, to ensure that new development conserves and enhances the special character of the wider area and the historic village rather than reflecting the more</p>

Site	Opportunities to conserve and enhance natural beauty	Actions
	adjoining Highfield Estate which consists of modern one and two storey houses of a design which is untypical of the Blackdown Hills NL. There is, however, an opportunity to create a development which is informed by the wider local vernacular which respects the special character of the area, and this should be a policy requirement.	modern and generic design of the post war housing around the site. Particular attention should be paid to the materials and height of dwellings to the enhance the character of the national landscape.

9.1 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
	




³². Criteria 5, 6 and 7 are taken from the footnote to the NPPF

³³ 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

	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.
7. Setting	<p>The site and the surrounding area are within LCT Open inland planned plateaux. This is a relatively simple landscape, with strong horizontal elements: flat horizons, straight roads and regular field boundaries. Landscape guidelines include any expansion of larger settlements (like Dunkeswell) strengthening development edges through sympathetic planning.</p> <p>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.</p>
8. Isolation ³⁴	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 ³⁵	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.


³⁴ Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) 'The Special Landscape Character'

³⁵ 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	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? ³⁶	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? ³⁷	No
20. Photos	 <p data-bbox="491 1487 1273 1563">Viewed for the road to the south, the site lies beyond this access and the adjoining gardens.</p>

³⁶ See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf \(blackdownhillsaonb.org.uk\)](#)

³⁷ Blackdown Hills [Management Plan](#) and extract of page 19 in Appendix 2

	 <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>

10. East Budleigh Context, Summary and duty to further the purpose.

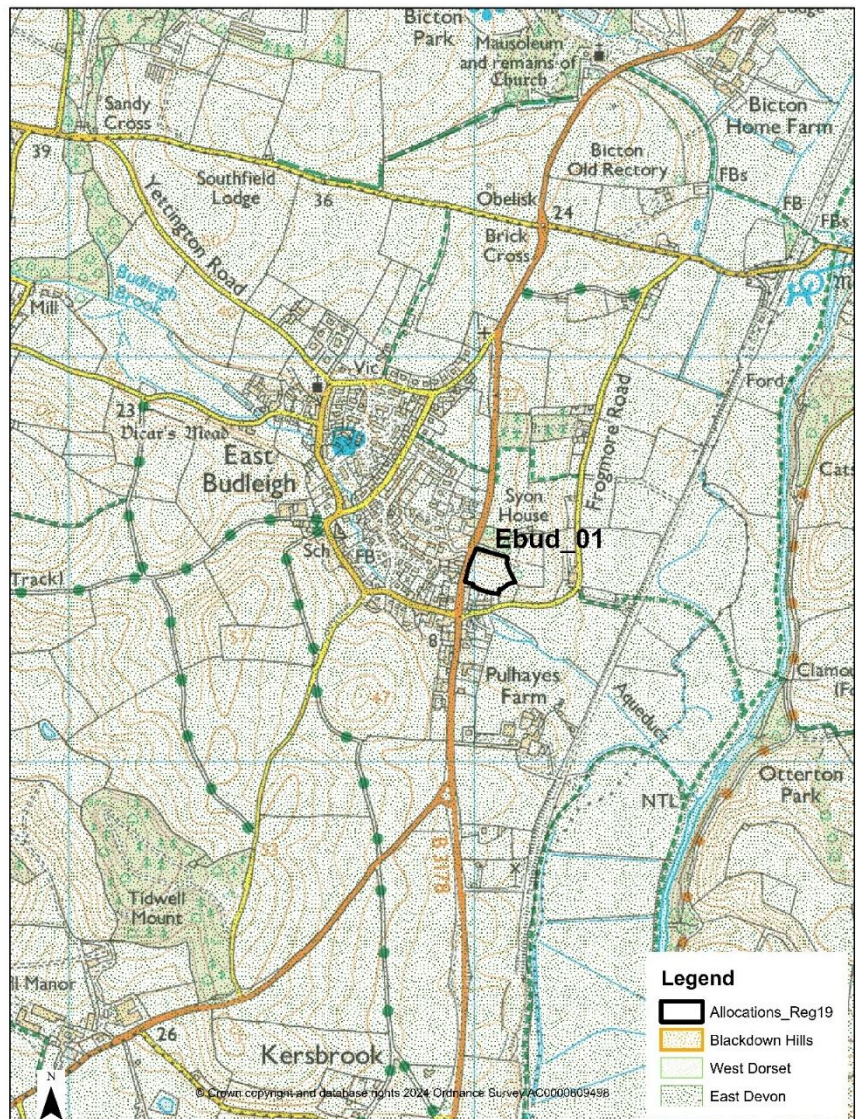
East Budleigh is a village located within and ‘washed over’ by the East Devon National Landscape (EDNL).

Only one reasonable alternative was considered at East Budleigh. (Ebud_01) was allocated for 22 dwellings in the first Regulation 19 plan. To enable a sympathetic development that takes account of the national landscape setting on the edge of historic settlement, it is considered appropriate to reduce this to 15 dwellings.

Development of the site could result in limited conflicts with the purpose of conserving and enhancing the natural beauty of the EDNL as identified in the assessment, but these can largely be mitigated.

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

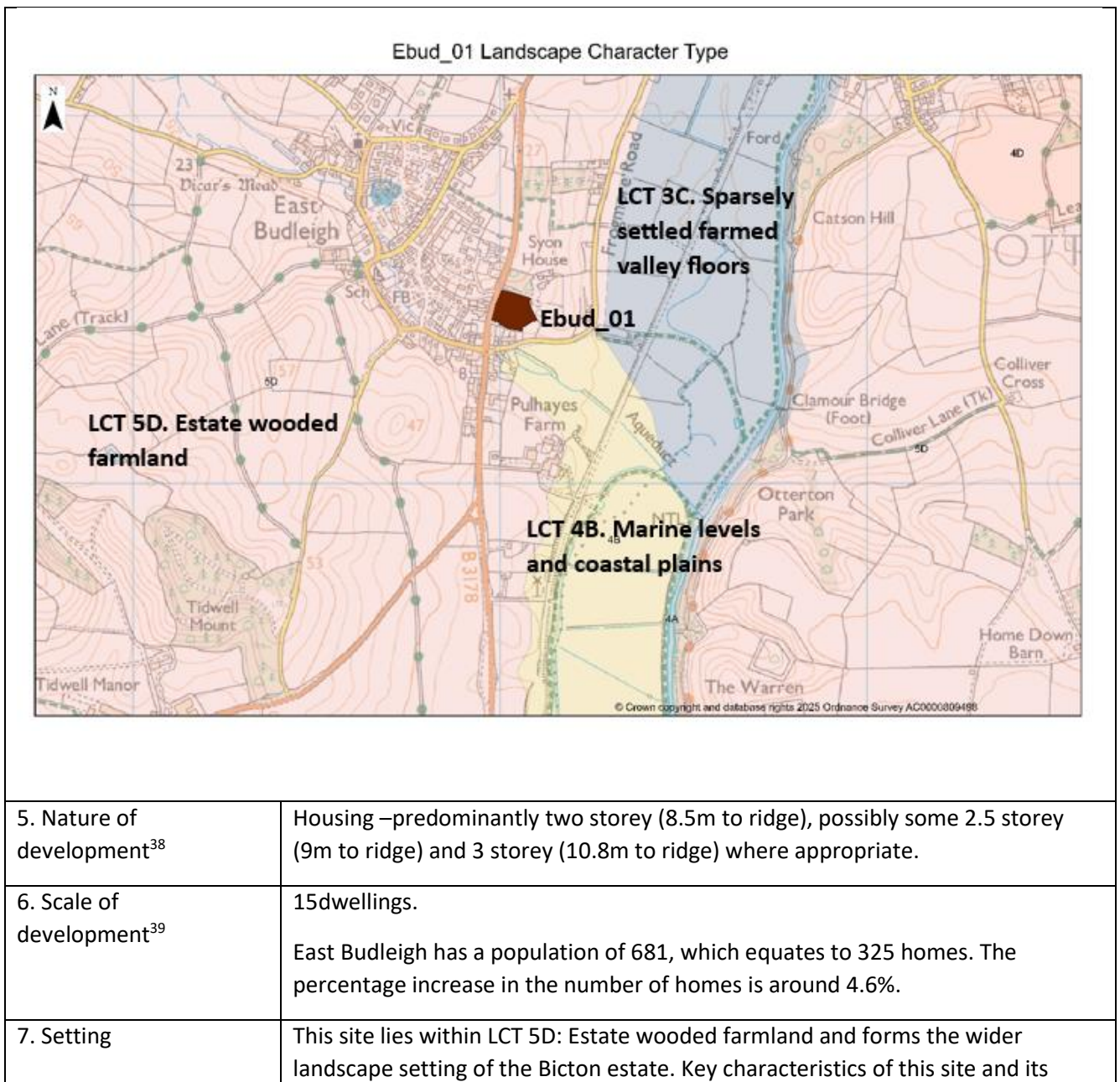
The potential of Ebud_01 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty are set out in the table below, together with how the local plan can help to deliver this.



Site	Opportunities to conserve and enhance natural beauty	Actions
Ebud_01	<p>This site is largely surrounded by and tends to be seen in the context of housing (existing and consented). Longer views from the wider landscape are largely restricted by topography, vegetation and other buildings but the site is partially visible in views from Otterton footpath 1 to the southeast.</p> <p>19th Century mapping shows the site as comprising parts of three fields. The Devon Historic Environment Record of historic landscape character shows the northern of these fields as a post-medieval enclosure and the southern two as a lost orchard. Subsequently, the integrity of the original field pattern has been lost through incorporation into the garden area of Syon House, the subdivision of the southeastern field and the amalgamation of the remaining fields.</p> <p>The natural beauty of the site and its context is diminished by the proximity of a busy road (the B3178), overhead lines and a rendered roadside boundary wall.</p> <p>There are opportunities for enhancement through the relocation of the lines underground and the replacement of the wall with a native hedgerow/hedge-bank. Referencing the historic field pattern of straight boundary hedges with some orchard planting would also make a positive impact.</p>	<p>Amend allocation from 22 dwellings to 15.</p> <p>The allocation policy notes that a high quality development scheme is required to reflect the national landscape setting and proximity to a non-designated heritage asset. The wording should be amended to refer to the need to ensure that the development is informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting. To further the landscape aims for this LCT, new buildings should also be sympathetic to existing buildings, particularly the heritage assets in the vicinity of the site.</p> <p>The policy already requires the overhead wires to be relocated underground and a pedestrian crossing over the B3178 but should be strengthened to require the replacement of the wall with an appropriate hedge/hedge-bank and the introducing an additional hedgerows within the site and orchard planting to reflect the historic use and field pattern.</p>

10.1 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




³⁸. Criteria 5, 6 and 7 are taken from the footnote to the NPPF



³⁹ 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>surroundings include the nucleated historic and estate village of East Budleigh. A likely cause of change identified is the erosion of distinctive character of settlements and their landscape setting. The landscape guidelines include new buildings being sympathetic to existing buildings. This site is also close to and can be seen from LCT's 3C: Sparsely settled farmed valley floors and 4B: Marine levels and coastal plains. Both of these LCT's comprise sparsely populated low-lying areas popular for recreation.</p> <p>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.</p>
8. Coastal scenery ⁴⁰	Site is visible from footpaths to south along Otter Estuary within LCT 4B. Marine levels and coastal plains.
9. Heathland commons	No impacts
10. Elevated land	No impacts.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ⁴¹	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.

⁴⁰ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

⁴¹ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

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
20. Photos	 <p data-bbox="497 1375 1230 1451">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>

10.2 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 4.6%. When existing permissions are taken into account the increase in houses rises to around 6.4%. 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.

11. Exmouth Context, Summary and duty to further the purpose.

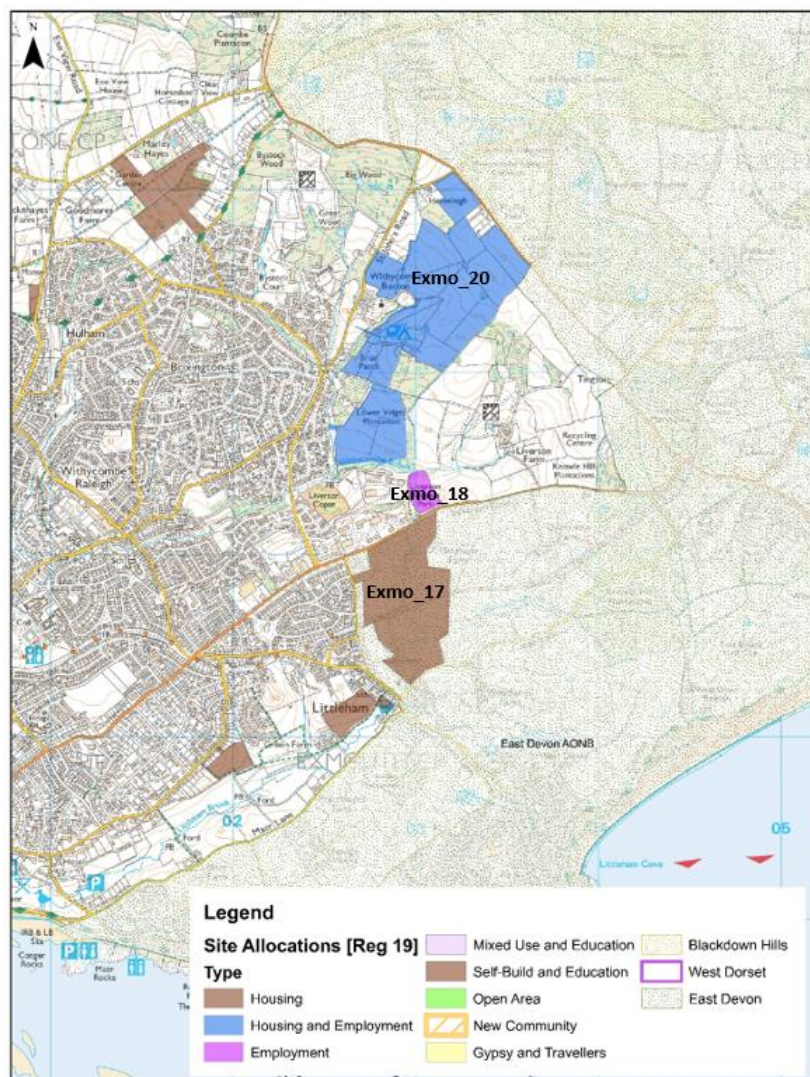
The East Devon National Landscape wraps around the south and east of Exmouth and includes some of the existing built-up area.

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 reasonable, 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 . development of the site could result in conflicts with the purpose of conserving and enhancing the natural beauty of the EDNL as identified in the assessment. However, these impacts are capable of mitigation to some extent and the development is justified in the context of the local plan strategy to direct significant levels of growth to Exmouth. This allocation is considered to constitute major development in the NL which is justified by exceptional circumstances. There is a ‘pre-application proposal’ for site Exmo_17 and the landowners/developers have undertaken community engagement which includes a website (landatlittleham.co.uk) with master plan, landscape plan and list of community benefits. EIA [screening](#) and [scoping](#) is also available.

One housing and employment and one employment allocation are adjacent to the EDNL (Exmo_20 and Exmo_18 respectively). Neither site 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. Development of both sites could result in some conflict with the purpose of conserving and enhancing the natural beauty of the EDNL as identified in the assessment. However, these impacts are capable of mitigation and the development is justified in the context of the local plan strategy to direct significant levels of growth to Exmouth.

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

The potential of Exmo_17, Exmo_18 and Exmo_20 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty is set out in the table below, together with how the local plan can help to deliver this.

Site	Opportunities to conserve and enhance natural beauty	Actions
Exmo_17	<p>The site is situated on sloping ground adjacent to the urban edge of Exmouth with the Liverton business park situated to the north, a 20th century housing estate to the northwest and the historic core of Littleham including the parish church to the southwest.</p> <p>The site area extends to 27.2ha of which approximately 13.5ha will remain undeveloped including provision of approximately 8.6ha of SANG, 1ha of SuDS and 2.8ha of other natural and semi-natural greenspace. As part of this open space, a minimum 250m buffer will be provided between site development parcels and Littleham Church to reduce adverse impact on its setting.</p> <p>Employment land is shown located on higher level ground at the northern end of the site adjacent to Salterton Road and will be set against the backdrop of Liverton Business Park beyond.</p> <p>Hedge removal should be minimised and any loss compensated for within the scheme proposals.</p> <p>A high standard of site and building design and appropriate materials reflecting local distinctiveness will be required with extensive</p>	<p>Policy SD01 requires the development to be undertaken in accordance with an agreed masterplan for the whole site with particular sensitivity to minimising potential for adverse impacts on the national landscape.</p> <p>The wording should be amended to refer to the need to ensure that the development will conserve and enhance the natural beauty of the site and its wider landscape setting and to further the purposes of the National Landscape. This should include access, biodiversity and landscape enhancements within the wider landscape to the east of the site.</p> <p>The policy also requires SANGs provision together with the enhancement of the current cycle route within an attractive</p>

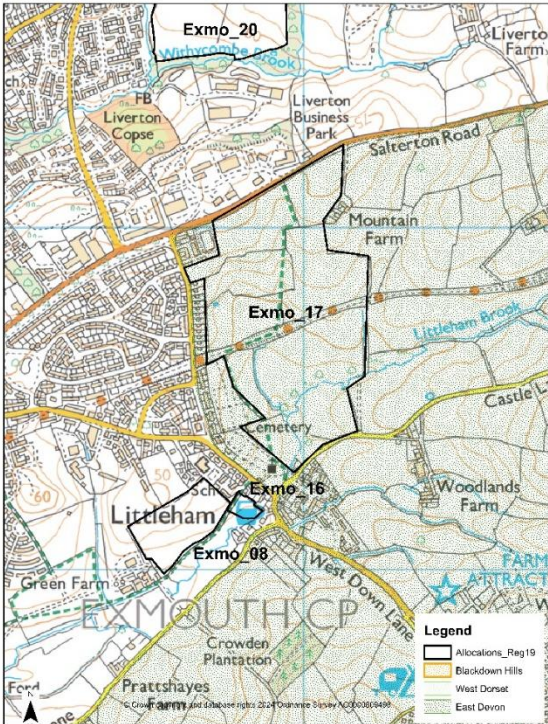

Site	Opportunities to conserve and enhance natural beauty	Actions
	<p>planting to help to screen and filter built form and associated infrastructure in key views from the National Landscape.</p> <p>The site forms part of an extensive tract of farmland, extending some way eastwards beyond the site, which is owned by the same landowner (Clinton Devon Estates). This provides opportunity to undertake a range of landscape and biodiversity enhancements within the wider landscape such as managing hedges less intensively, hedge re-instatement, providing additional trees and creating biodiverse grassland to field margins, secured through section 106 agreement.</p> <p>National Cycle Route 2 passes through the middle of the site on the former railway corridor and affords active travel links to Littleham and Exmouth town centre to the west and Budleigh Salterton to the east.</p> <p>There is also potential for providing additional footpath/ bridleway links from NCR2 over adjacent land to create circular routes and connect with the South West Coast Path secured through s106 agreement.</p>	<p>corridor and other pedestrian and cycle routes throughout the development. This wording could also be improved by requiring circular routes within the site and connections to the wider network of footpaths and cycleways, including the South West Coast Path as well as to local services in Littleham and to the Liverton Business Park.</p>
Exmo_18	<p>This site is not located in the national landscape, but the southern part of the site is adjacent to it, on the other side of Salterton Road, which follows a low ridge line.</p> <p>One of the planning aims for this Landscape Character Type is to avoid development on the skylines.</p> <p>Historic mapping shows no changes to the field boundaries since the 19th Century.</p>	<p>Policy SD01 says that the land is allocated for employment uses as an extension to the existing business park. The wording should be amended to say that “Development should be designed to take account of the relationship between the site and the East Devon National Landscape, with vehicular access from the Liverton Business Park (not Salterton Road) and no built development</p>

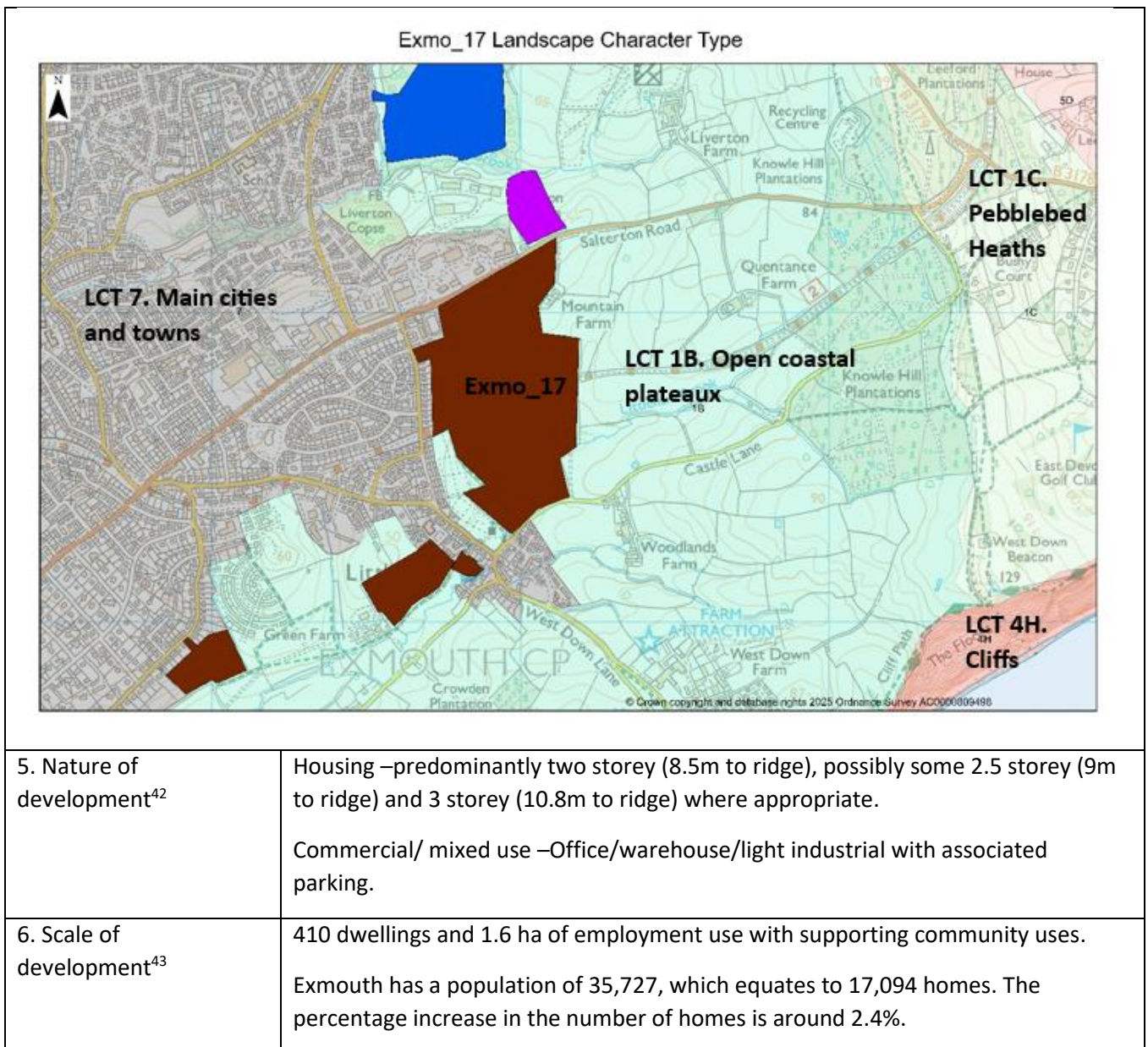
Site	Opportunities to conserve and enhance natural beauty	Actions
	<p>The site drops steeply from Salterton Road at a gradient of 1:5. Formation of a new access off Salterton Road is likely to involve extensive grading and engineering works to create a route at suitable gradient which is likely to have localised adverse landscape and visual impacts on the National Landscape and its setting. This could be avoided by limiting development to the northern 2/3 of the site with access provided from the Liverton Business Park.</p> <p>Building heights should be kept below the level of the ridgeline to the south. Existing hedges to the southern and eastern site boundaries should be reinforced and appropriately managed and additional trees provided. Subject to development in accordance with the above mitigation measures there should be low/negligible adverse impact on the NL or its setting.</p>	<p>in the southern third of the site. Existing hedges to the southern and eastern site boundaries should be reinforced and appropriately managed and additional trees provided”.</p>
Exmo_20	<p>Exmo 20 is a very large site situated to the east of St Johns Road. The northeastern boundary abuts the B3179 and the East Devon National Landscape. The eastern boundary is mostly set back from St John’s Road with only one field within the site providing direct frontage onto it. The site boundaries encompass an area of 84.8ha of which preliminary proposals prepared by the promoter indicate 41.5ha will be developed.</p> <p>The site has a southwesterly aspect with the highest fields situated on a plateau edge which falls away moderately steeply down through the site. An undulating landform below the plateau together with blocks of woodland, hedges and small copses within and around the site generally limit views out to the fields on the plateau at the northeastern end which afford distant views to the sea and across the Exe estuary.</p>	<p>Policy SD01 states that no development that would result in an unacceptable impact will be permitted within 400 metres of the Pebble bed heaths. However, there is no mention of the relationship of the site to the national landscape and the policy could be improved by highlighting the importance of this and ensuring that opportunities to enhance the natural beauty of the national landscape are incorporated into the development. Policy should also restrict street lighting along the proposed access road serving the site and require</p>

Site	Opportunities to conserve and enhance natural beauty	Actions
	<p>A 400m development buffer is required to be provided from the boundaries of the SPA/SAC. As this coincides with the higher, more open parts of the site, maintaining it clear of development will also help to reduce landscape and visual impact of the development in the wider landscape.</p> <p>There is some potential for partial views of the developable parts of the site from the National Landscape along Liverton Road and higher ground to the south.</p> <p>The site is somewhat set apart from the built-up area of Exmouth and possible locations for vehicular access are limited. St Johns Road is narrow, tree lined and lacks width for footways. The only alternative with the current land available is to create an access off the B3179. The creation of a new road in this location with associated kerbing, footways and visibility splays could have localised adverse impacts on the National Landscape. These should be minimised by sensitive design, avoiding streetlighting between the junction and lower, developable parts of the site and provision of appropriate mitigation planting including new hedgebanks and woodland creation.</p> <p>The site currently affords poor active travel connections. As an access from the B3129 would be somewhat remote from local services, new cycle and pedestrian links should be provided onto St Johns Road to the east and the Meadow View estate from the southwest corner of the site. The latter would offer onward links to Liverton Business Park and Salterton Road.</p> <p>There is opportunity for heathland creation on higher land at the northeastern end of the site as landscape enhancement. Existing hedges and trees within the</p>	<p>provision of foot/ cycle path links to the Meadow View estate and Liverton Business Park and/ or appropriate financial contributions towards securing these.</p>

Site	Opportunities to conserve and enhance natural beauty	Actions
	<p>site should be retained and reinforced with additional planting and habitat creation.</p> <p>NE requirements for fencing/ buffering of any onsite SANG from the SAC/SPA will be of only limited value given the likely provision of the main site access from the B3179 will be situated opposite designated access land on the Pebble Bed heaths. Conversely, however, site development could enhance active travel links from the town to the Pebble Bed heaths.</p>	

11.1 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
 <p>This is a topographic map of the Exmoor National Landscape. It shows various geographical features including the Littleham Brook, Liverton Brook, and several farms such as Liverton Farm, Mountain Farm, and Woodlands Farm. The map highlights several development areas: Exmo_08, Exmo_16, Exmo_17, and Exmo_20. 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 blue outline. The map also shows 'Littleham CP' and 'Prattshayes Farm'.</p>	 <p>This is an aerial photograph of the same area shown in the topographic map. The development areas Exmo_16 and Exmo_17 are highlighted in a semi-transparent blue color. The surrounding landscape, including fields, roads, and buildings, is clearly visible. A legend in the bottom right corner identifies 'Allocations_Reg19' with a black outline.</p>




⁴². Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁴³ 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

7. Setting	<p>The site is within LCT 1B: Open coastal plateaux. Key characteristics of the site and its surroundings are a relatively large-scale landscape, with a regular medium to large field pattern, dense low hedges. The expansion of settlements upwards from lower land is highlighted as a force for change and landscape guidelines include protecting skylines which contribute to coastal views and form the settings to settlements. Planning objectives include enhancing the Rights of Way network linking paths and access land to create circular walks from settlements.</p> <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 hills on the other side.</p>
8. Coastal scenery ⁴⁴	<p>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.</p>
9. Heathland commons	<p>No impacts</p>
10. Elevated land	<p>No impacts.</p>
11. Agricultural valley bottoms	<p>No impacts.</p>
12. Landscape quality ⁴⁵	<p>The landscape quality of the site is high with the south of the site having an intimate, enclosed quality whereas the higher northerly parts are more open and prominent and more intensively farmed.</p>
13. Scenic quality	<p>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.</p>

⁴⁴ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

⁴⁵ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

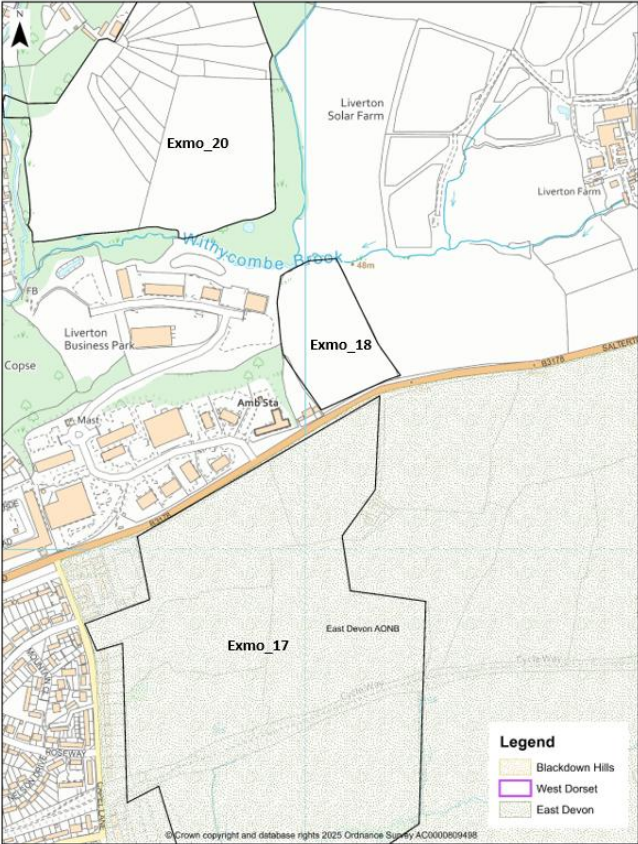

14. Relative wildness	Low impact – the site has low levels of wildness, being is part of a managed landscape at the edge of a large town.
15. Relative tranquillity	Medium impact – the adjoining housing and traffic on the adjacent B3178 reduce levels of tranquillity in the north of the site but levels 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?	Yes. 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.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No. 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.
20. Photos 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.	

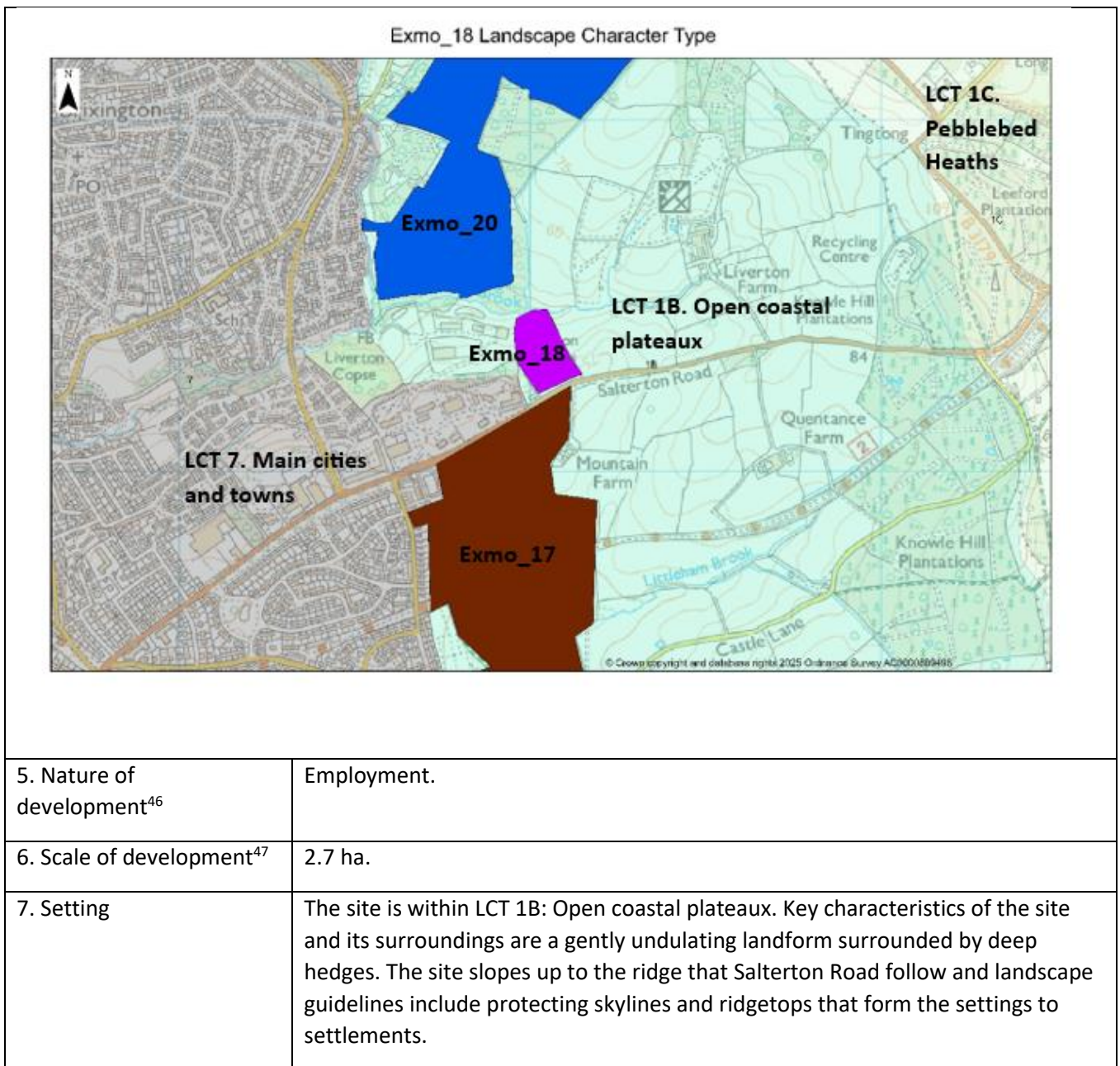
11.2 Exceptional Circumstances Assessment Exmo_17

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Exmo_17
Need for the development. Is the scale and location of development in general accordance with the spatial strategy of the draft local plan?	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.
Alternatives. Are there other sites that are well related to the relevant settlement which could result in less harm to the national landscape?	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.
Are there any cumulative Impacts on the national landscape from other proposed allocations?	There are no other allocations or planning permissions in the EDNL around Exmouth. The site boundaries of Exmo 20, a 700 home allocation, is within the setting of the NL but the developable area is buffered from it. It is unlikely that cumulative landscape or visual impacts on the NL would arise from the combined development of Exmo 17 and 20 or in relation to them and existing urban fabric.
What is the predicted landscape impact? Can any detrimental impacts be mitigated?	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.
What is the predicted environmental impact? Can any detrimental impacts be mitigated?	Ecological impacts are minimal, and no other environmental impacts are noted.
Are there any 'exceptional	Yes

circumstances' that would justify development in the 'public interest'.	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.
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11.3 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
	




⁴⁶. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁴⁷ 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

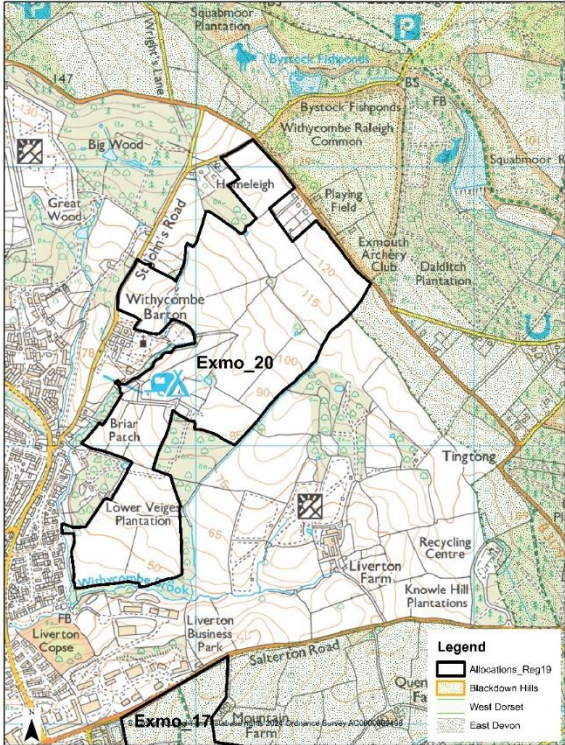
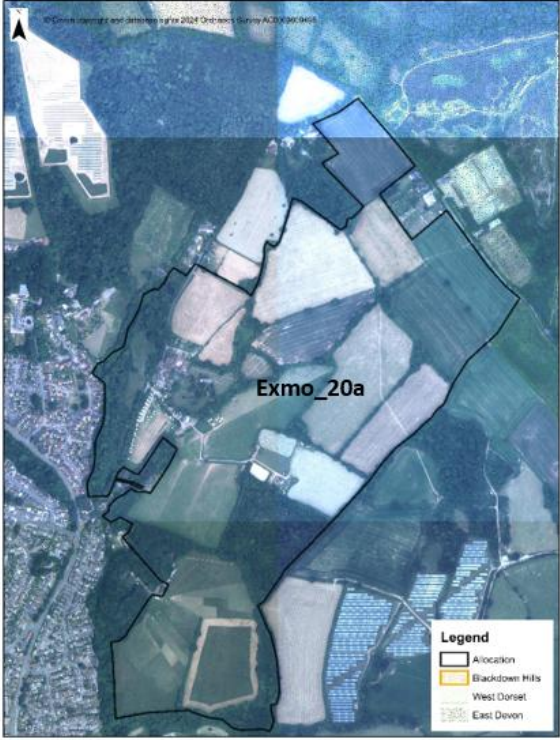
	The site lies just to the north of the East Devon National Landscape, separated from it by the east-west running Salterton Road. There is, however, comparatively limited inter-visibility between the EDNL to the south and the site. In views from the north the site is more open and exposed, including from longer distance AONB views.
8. Coastal scenery ⁴⁸	Very limited impact. The land to the south of Salterton Road lies in the Coastal Preservation Area and there are some limited views of the coast from the road, but the site is adjacent to existing development, the relationship between the site and the coast is very limited and the site has no obvious coastal influences.
9. Heathland commons	No impacts.
10. Elevated land	Potential local high impact. The section of Salterton Road south of the site follows a small ridgeline from which the land falls away steeply at a gradient of 1:5 . Formation of a new access off Salterton Road is likely to involve extensive grading and engineering works to create a route at suitable gradient which is likely to have localised adverse landscape and visual impacts on the National Landscape and its setting.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ⁴⁹	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 and power lines that cross the site.
14. Relative wildness	Low impact-- the site has low levels of wildness, being 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

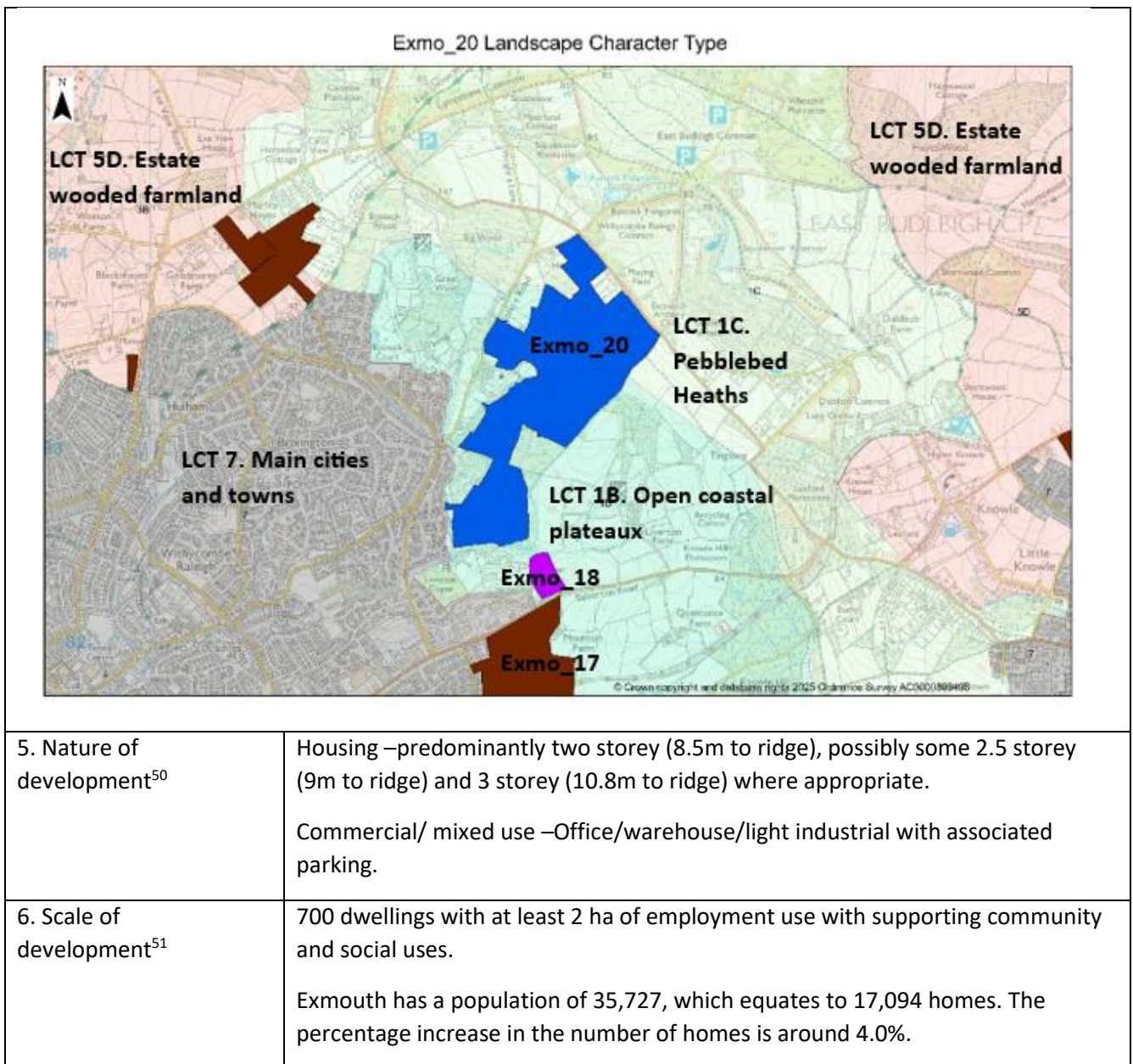
⁴⁸ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

⁴⁹ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

	
<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 localised impacts are capable of mitigation .</p>

11.4 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
	



⁵⁰. Criteria 5, 6 and 7 are taken from the footnote to the NPPF


⁵¹ 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>7. Setting</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 a 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. Although there is generally little woodland in this LCT, there are areas of woodland on the boundaries of the site. The expansion of settlements upwards from lower land is highlighted as a force for change. Planning objectives include enhancing the Rights of Way network linking paths and access land to create circular walks from settlements.</p> <p>In the northeast of the site on higher ground the site forms part of 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. Landscape aims include retention of the open and unsettled quality of the landscape with particular attention to skylines and the role of the ridge as a backdrop for surrounding lowlands, and a setting for the World Heritage Site.</p> <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 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>
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8. Coastal scenery ⁵²	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 ⁵³	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.
16. Natural heritage features	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.
17. Cultural heritage	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
18. Would any of the special qualities summarised in the East	No

⁵² Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

⁵³ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

<p>Devon management plan be affected by the proposed development?</p>	
<p>19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?</p>	<p>No.</p> <p>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 east of Barcley Lodge.</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, subject to the there being no built development, other than an access road, on higher land adjacent to the EDNL</p>

12. 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 BHNP.

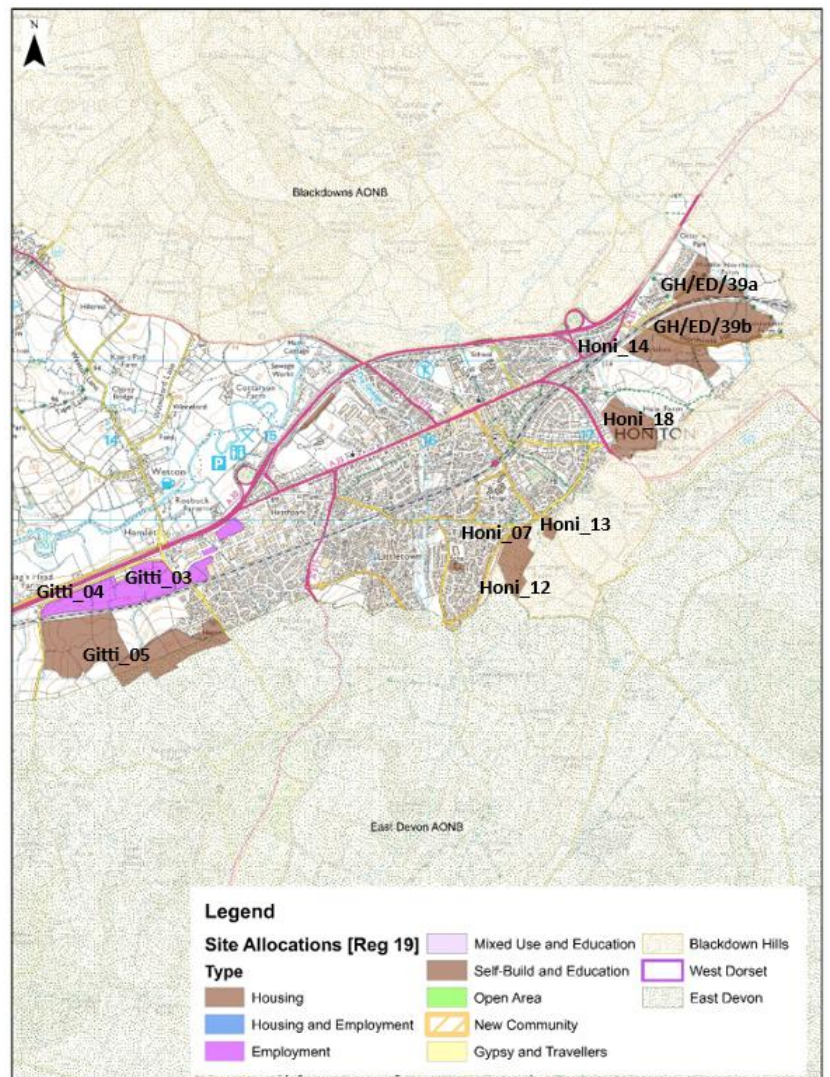
Honiton is one of the main centres in East Devon and the local plan strategy is to promote significant development here.

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). 9 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. One site (Honi_12) that was allocated in the 1st regulation 19 plan is no longer proposed for allocation. This site has a capacity of 71 dwellings, but the total of allocations in Honiton will not be reduced due to an increase in density at two other sites, GH/ED/39a&b.

9 allocations are now proposed with a yield of some 877 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 two proposed allocations at Honiton in the BHNL (Honi_07 and Honi_13). These sites are located to the south of the town, to the east and west of St. Michael's Church (which is a Grade II* listed building). Honi_07 comprises a small field with a capacity of 30 dwellings, which is considered to constitute major development for which there are exceptional circumstances. Honi_13 is partly developed and is 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. Development of the site could result in limited conflicts with the purpose of



conserving and enhancing the natural beauty of the EDNL as identified in the assessment, but these can be mitigated to a large degree. The allocation is justified in the context of the local plan strategy to promote significant development at Honiton. The allocation 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). Development of Honi_18 could result in conflicts with the purpose of conserving and enhancing the natural beauty of the BHNL as identified in the assessment. Impacts could be mitigated to some extent and the allocation is considered to constitute major development in the context of the national landscape for which there are exceptional circumstances. Development of GH/ED/39b could result in limited conflicts with the purpose of conserving and enhancing the natural beauty of the BHNL as identified in the assessment. The impacts could largely be mitigated and the allocation is justified in the context of the local plan strategy to direct significant growth to Honiton. The revised allocation refers to upto 300 dwellings on the site, but this is subject to further assessment and may be lower. 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.

The potential for Honi_07, Honi_13, Honi_18, Gitti_05 and GH/ED/39b to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty is set out in the table below, together with how the local plan can help to deliver this.

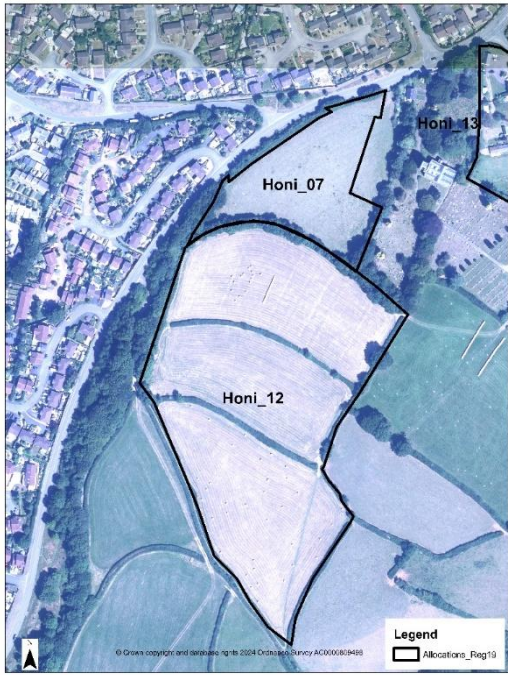
Site	Opportunities to conserve and enhance natural beauty	Actions
Honi_07	<p>Opportunities to enhance the national landscape are limited, but existing boundary hedges and trees could be protected and reinforced and particular attention given to landscaping the areas of open space. The scale of housing, including ridge heights, materials and vernacular detailing should be appropriate to the BHNL and the setting of the listed buildings. The site is on the edge of the urban area and, to minimise the spread of light pollution and minimise impacts on the listed Church, streetlights should be ‘capped’ to point downwards.</p> <p>A feasibility layout was submitted in support of the site during the first</p>	<p>The policy for this site currently notes that it is in the BHNL and close to heritage assets so will require very careful design to take account of its landscape setting with high quality design. This could be improved through referencing the need for open space to be located to reduce the impact of development on the setting of adjacent listed buildings and references to the scale, design, lighting and materials being appropriate to the BHNL.</p>

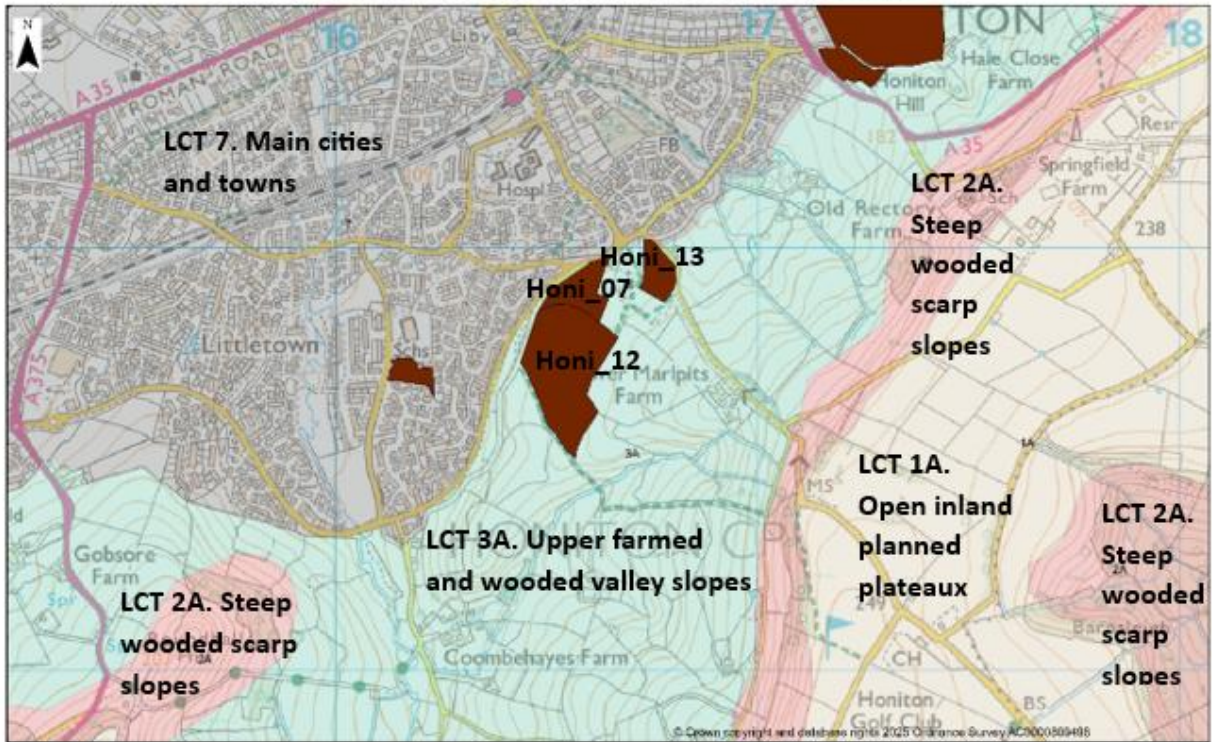
Site	Opportunities to conserve and enhance natural beauty	Actions
	<p>regulation 19 consultation. This shows areas of open space to the northeast of the site that would help to preserve the setting of the listed buildings. Retention of existing boundary hedgerows and trees is also shown with ecology buffers of generally 3 metres.</p>	
<p>Honi_13</p>	<p>Opportunities to enhance the national landscape are limited, but existing boundary hedges and trees could be protected and reinforced and particular attention given to retaining an open aspect for the setting of the Church. The scale of housing, including ridge heights, materials and vernacular detailing should be appropriate to the BHNL and the setting of the listed buildings. The site is on the edge of the urban area and, to minimise the spread of light pollution and minimise impacts on the listed Church, streetlights should be ‘capped’ to point downwards.</p>	<p>The first regulation 19 plan policy noted that the site is in the Blackdown Hills National Landscape and close to heritage assets and requires very careful design to take account of its landscape setting and the setting of surrounding heritage assets.</p> <p>This could be improved through referencing the need to retain an open aspect to reduce the impact of development on the setting of the listed Church and references to the scale, design, lighting and materials being appropriate to the BHNL.</p>
<p>Honi_18</p>	<p>This site is located outside of but adjacent to the BHNL.</p> <p>A concept plan submitted by the site promoter to support the allocation shows areas of open space to the south, east and north of the site. This layout would concentrate development on the lower slopes of the site and help to separate development from the national landscape and conserve the setting of listed gateway buildings on the other side of Kings Road. Historic mapping shows the field boundaries to be largely</p>	<p>Policy SD03 does not refer to the relationship between the site and the Blackdown Hills National Landscape.</p> <p>The wording should be amended to refer to the need to ensure that the development is informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider national landscape setting. This should involve keeping an open space on the higher ground to the south of the</p>

Site	Opportunities to conserve and enhance natural beauty	Actions
	<p>unchanged since the 19th Century. There is an opportunity to enhance the existing hedgerows and to consider the inclusion of small areas of woodland in keeping with the landscape character of the area.</p>	<p>site and reinforcing existing hedgerows within the site. Consideration should also be given to restricting the height of buildings and the palette of materials to compliment the national landscape setting.</p>
<p>Gitti_05</p>	<p>Documents submitted on behalf of the landowner show development to be accommodated outside of the national landscape with land within the national landscape being kept open for biodiversity net gain and open space. Key principles include the retention of existing vegetation with an appropriate ecology buffer along streams and hedgerows within the whole site and reduced density on the periphery, including frontages facing the national landscape.</p> <p>Historical mapping shows that some field boundaries have been lost since the 1951 to 1992 map, largely in the north of the site, outside of the national landscape. The Devon Historic Environment Record shows historic landscape character field boundary loss of 56% on parts of the site. There is an opportunity within the areas of open space and also within the housing development to reinstate a patchwork of hedgerows and possibly woodland to reflect the character of the wider landscape.</p>	<p>Policy SDO3 requires the allocation to come forward on the basis of an agreed masterplan and that those parts of the site which are in the national landscape requiring very careful design to take account of the landscape setting. This policy could be strengthened through referring to the need to ensure that the development is informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting. This should include a requirement to plant additional hedgerows and possibly small areas of woodland within the site.</p>

Site	Opportunities to conserve and enhance natural beauty	Actions
GH/ED/39b	<p>This site is located outside of the national landscapes but eastern parts of it adjoin the Blackdown Hills national landscape.</p> <p>A vision document to support both this allocation and site to the north (GH/ED/39a) was submitted on behalf of the developers to the 1st Regulation 19 consultation. This suggests that development in the western part of the site would continue the established linear settlement pattern that exists within Honiton, but the eastern bowl, beyond the ridgeline, should be kept as an open space that will provide a suitable setting for the National Landscape because it does not fit the settlement pattern and is above 160m AOD. There is an opportunity to enhance the belt of vegetation along the ridgeline to wrap around the development within the western valley. The vision document highlights potential for a community park in this area with additional native planting enhancing the existing rural character. Overhead electricity cables cross the site and extend into the national landscape and development around these is proposed for public open space and habitat creation.</p>	<p>The wording should be amended to refer to the need to ensure that the development is informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting and to further the purposes of the national landscape. There should be no development on land above the 160M AOD. Provision should be made for suitably landscaped areas of open space with circular walks throughout the site, giving particular attention to the relationship with the national landscape.</p>

12.1 Major Development Assessment for Honi_07

Form 2: Assessment of Major Development in Blackdown Hills National Landscape	
Criteria	Assessment
Protected Landscape	Blackdown Hills
2. Reference	Honi_07
3. Map	4. Aerial Map
	

Honi_07, Honi_12 and Honi_13 Landscape Character Type	
	
5. Nature of development ⁵⁴	Housing – predominantly two storey (8.5m to ridge).
6. Scale of development ⁵⁵	30 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 0.5%.
7. Setting	The site is in LCT 3A: Upper farmed and wooded valley slopes. This is an ancient and settled landscape, containing patchworks of irregular fields and is relatively small in scale with an intimate feel. It has exceptionally high scenic quality, with landscape patterns visible from surrounding higher ground. Key characteristics of this LCT that are seen on the site and the surrounding areas are small to medium-size fields with irregular boundaries. The need for

	<p>additional housing, development pressures, particularly around Honiton, together with linear growth of settlements along valleys, are identified as forces for change. A key landscape aim is to protect and enhance the historic fabric and existing landscape structure of small fields and woodlands, so that the landscape retains its special ‘patchwork’ character and spectacular views.</p> <p>The site comprises a field on the edge of Honiton that is largely enclosed by mature hedges and trees. It is located on gently sloping ground that is elevated from the urban area to the north and west. St. Michaels’s church, a grade II* listed building is sited to the east of the site. The former Sexton’s House, to the northeast of the site, has been listed as grade II since the site was allocated in the first Regulation 19 plan.</p>
8. Isolation ⁵⁶	Low impact - The site adjoins the town and a busy road, although a belt of trees along the western boundary gives a limited sense of isolation.
9. Landscape Pattern	Medium Impact - Honi_07 comprises a moderately steeply sloping field with housing on opposite side of main road to the north, which is at a lower level. The site is part of an intricate pattern of fields on rising 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	Low impact - No distinctive features.
11. Architecture	High impact - 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. The former Sextons house is diminutive in scale and built from stone with a slate roof.
12. Landscape quality ⁵⁷	High impact - The site forms part of the attractive landscape setting of Honiton and the site assessment found the site to have a medium high landscape sensitivity.
13. Scenic quality	High impact - The site has scenic qualities that include its open agricultural use on elevated land from the adjoining road and mature boundary vegetation.
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 - Despite the adjoining town and busy road, the site has some sense of tranquillity.
16. Natural heritage features	Medium impact - There are mature trees and hedges to the site boundaries that could be retained.
17. Cultural heritage	High impact - The site adjoins the grounds of the Church of St Michael, grade 2* listed building and the Former Sextons House, a grade 2 listed building. The site is close to the church and visible from the asset, although views are filtered by 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 proposed development? ⁵⁸	Yes Landscape pattern, architecture, landscape quality and scenic quality.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined ⁵⁹ ?	No

20. Photos

Honi_07 and the Sexton's House viewed from verge to north of main road



Honi_07 looking north across site



View from Stoney Lane looking north



21. Would allocation constitute major on any one criterion?	No.
22. Would allocation constitute major with any combination of criteria?	Yes, impacts on elevated land, , landscape pattern, architecture, scenic and landscape quality.
23. Major development?	Yes

12.2 Exceptional Circumstances Assessment Honi_07

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Honi_07
<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 877 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 and Honi_12 are in the BHNL and were rejected due to significant adverse landscape impacts. • The combined yield of rejected sites in a NL was 381. 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>Yes – the other allocations around Honiton in the NL are Honi_13 and Gitti_05. Honi_13 is immediately east of the Church and graveyard and Honi_07 is just to the west of the Church. There is potential for a cumulative impact on the setting of the Church and the wider landscape. Gitti_05 is partly within the EDNL and is around 1900 metres from 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 there will be a 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>

12.3 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

Honi_07, Honi_12 and Honi_13 Landscape Character Type	
5. Nature of development ⁶⁰	Housing –predominantly two storey (8.5m to ridge).
6. Scale of development ⁶¹	10 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 0.2%.
7. Setting	The site is in LCT 3A: Upper farmed and wooded valley slopes. This is an ancient and settled landscape, containing patchworks of irregular fields and is relatively small in scale with an intimate feel. It has exceptionally high

⁶⁰. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁶¹ 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>scenic quality, with landscape patterns visible from surrounding higher ground. Key characteristics of this LCT visible in the vicinity of the site include winding rural lanes with hedge banks and flower rich verges, an intimate and intricate landscape and mediaeval churches. The need for additional housing, development pressures, particularly around Honiton, together with linear growth of settlements along valleys, are identified as forces for change. A key landscape aim is to protect and enhance the historic fabric and existing landscape structure of small fields and woodlands, so that the landscape retains its special ‘patchwork’ character and spectacular views.</p> <p>The site comprises a large, detached dwelling with several outbuildings, a large garden area and separate grassed area. Planning permission for the demolition of a barn and construction of a development has been granted on a small part of the site (21/2641/FUL).</p> <p>The site is located on the edge of Honiton and is well screened from close views by mature trees and hedges. Longer range views from the south are filtered by deciduous trees, although the site is seen within the context of the church tower to the west of the site.</p>
8. Isolation ⁶²	Low impact - This site adjoins the town and is partly in residential use.
9. Landscape Pattern	<p>Medium Impact - Although largely in residential use, there is a significant proportion of open space within the site that helps to contribute towards the intricate pattern of fields on rising ground to the edge of the town. The 1880 to 1932 maps show that the site formed part of a larger field, the southern part of which now forms an extension to the church graveyard. Development of the site would extend housing into the south of the site but could be accommodated within the existing landscape framework if the existing access is used, without loss of trees and hedges.</p>
10. Geology	Low impact - No distinctive features.
11. Architecture	<p>High impact – although there is little vernacular character in nearby housing, the site is immediately adjacent to a grade II* Church. Development on part of the site is likely to erode the rural setting that contributes to the significance of this listed building.</p>

⁶² Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) ‘The Special Landscape Character’

12. Landscape quality ⁶³	Medium impact - The landscape quality of the northern residential part of the site is unremarkable, but boundary trees and hedges contribute to local landscape character.
13. Scenic quality	Medium impact – The boundary trees and hedges contribute to the scenic qualities of the wider area.
14. Relative wildness	Low impact - The site has low levels of wildness, being part of a managed and suburban landscape.
15. Relative tranquillity	Medium impact - The existing use and proximity of busy roads limit levels of tranquillity to some degree, but development of the site could have a detrimental impact on the rural setting and levels of tranquillity related to the Church and graveyard.
16. Natural heritage features	Medium impact - There are mature trees and hedges to the site boundaries that could be retained.
17. Cultural heritage	High impact - The site adjoins the grounds of the Church of St Michael, grade 2* listed building. Development on part of the site is likely to erode the rural setting that contributes to the significance of this listed building.
18. Would any of the special qualities summarised in the Blackdown Hills management plan be affected by the proposed development? ⁶⁴	Yes –architecture.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined ⁶⁵ ?	No

⁶³ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

⁶⁴ See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf](#) (blackdownhillsaonb.org.uk)

⁶⁵ Blackdown Hills [Management](#) Plan and extract of page 19 in Appendix 2

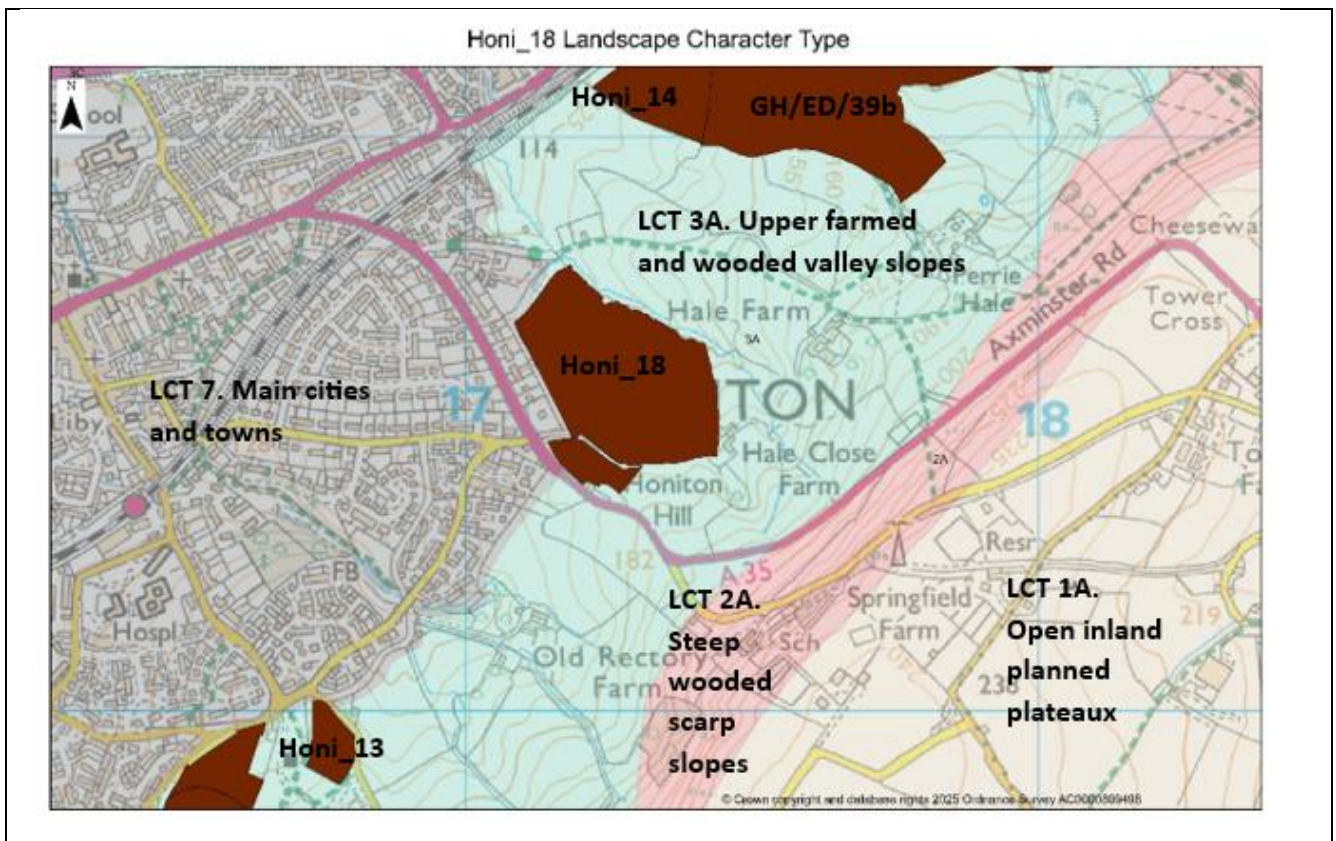
12.4 Exceptional Circumstances Assessment Honi_13

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Honi_13
<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 877 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 and Honi_12 are in the BHNL and were rejected due to significant adverse landscape impacts. • The combined yield of rejected sites in a NL was 381. 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>Yes – the other allocations around Honiton in the NL are Honi_07 and Gitti_05. Honi_07 is immediately west of the Church and graveyard and Honi_13 is just to the east of the Church. There is potential for a cumulative impact on the setting of the Church and the wider landscape. Gitti_05 is partly within the EDNL and is around 1900 metres from so that any cumulative impacts are limited.</p>
<p>What is the predicted landscape impact? Can any detrimental impacts be mitigated?</p>	<p>Limited impact to local landscape character, but of the rural setting that contributes to the significance of the Church of St Michael. Detrimental impacts can be mitigated to some extent.</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>

12.5 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	Honi_18
3. Map	4. Aerial map



5. Nature of development ⁶⁶	Housing –predominantly two storey (8.5m to ridge).
6. Scale of development ⁶⁷	136 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 2.5%
7. Setting	The site is in LCT 3A: Upper farmed and wooded valley slopes. This is an ancient and settled landscape, containing patchworks of irregular fields and is relatively small in scale with an intimate feel. It has exceptionally high scenic quality, with landscape patterns visible from surrounding higher ground. Key characteristics of


⁶⁶. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁶⁷ 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>this LCT that are seen on the site and the surrounding areas are small to medium-size fields with irregular boundaries and stream habitats. The need for additional housing, development pressures, particularly around Honiton, together with linear growth of settlements along valleys, are identified as forces for change. A key landscape aim is to protect and enhance the historic fabric and existing landscape structure of small fields and woodlands, so that the landscape retains its special ‘patchwork’ character and spectacular views.</p> <p>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.</p>
8. Isolation ⁶⁸	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.
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 ⁶⁹	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.


⁶⁸ Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) ‘The Special Landscape Character’

⁶⁹ 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	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? ⁷⁰	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? ⁷¹	No
20. Photos	 <p data-bbox="501 1518 1358 1592">Looking south over southern part of site with Kings Road behind hedge to right of photo. The house is just inside the BHNL.</p>

⁷⁰ See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf \(blackdownhillsaonb.org.uk\)](#)

⁷¹ Blackdown Hills [Management Plan](#) and extract of page 19 in Appendix 2

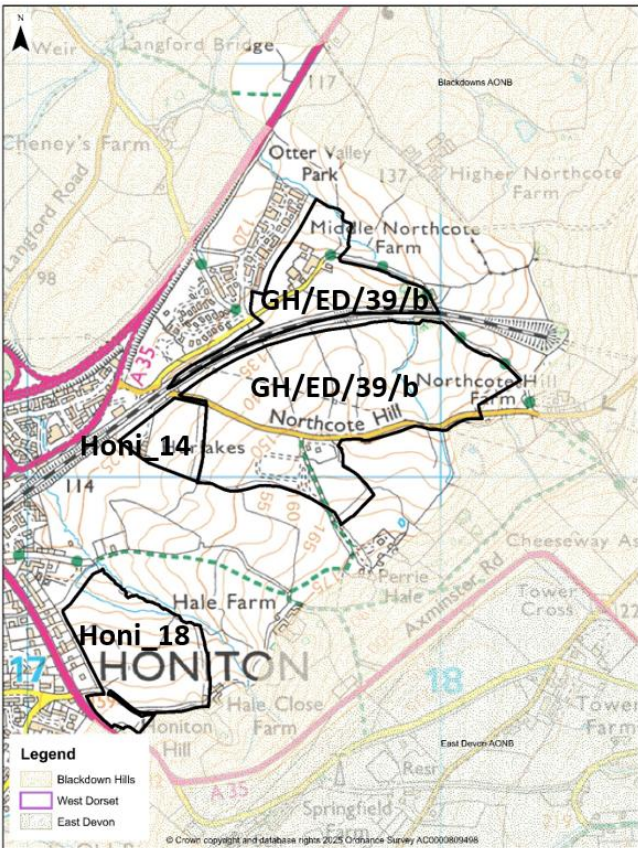
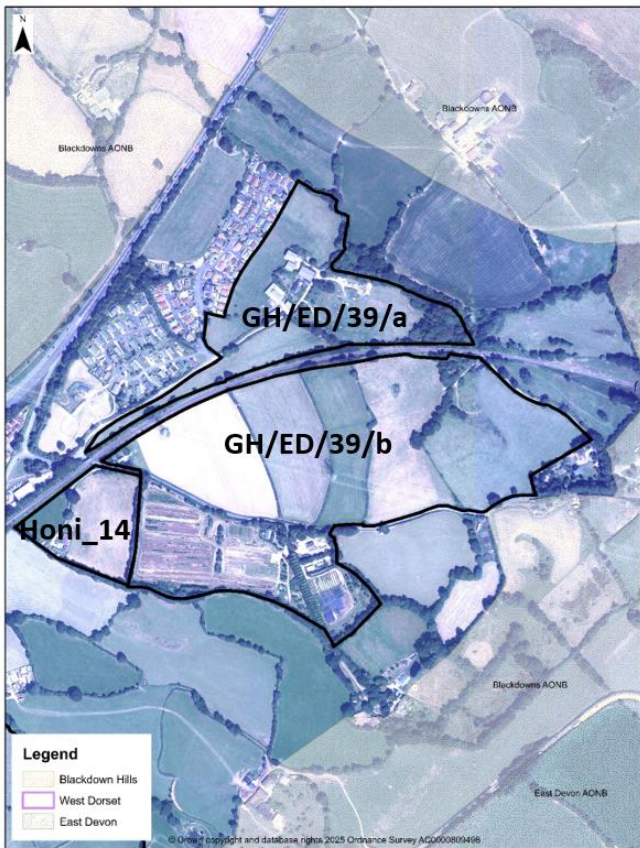
	 <p data-bbox="497 840 1369 913">Looking east along access to Hale Close Farm with site to left of shot and BHNL to right of access.</p>
<p data-bbox="156 974 448 1081">21. Would allocation constitute major on any one criterion?</p>	<p data-bbox="486 974 534 1003">No.</p>
<p data-bbox="156 1111 421 1256">22. Would allocation constitute major with any combination of criteria?</p>	<p data-bbox="486 1111 1145 1144">Yes – criteria 12 and 13 – landscape and scenic quality.</p>
<p data-bbox="156 1288 456 1317">23. Major development?</p>	<p data-bbox="486 1288 539 1317">Yes.</p>

12.6 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 877 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 and Honi_12 are in the BHNL and were rejected due to significant adverse landscape impacts. • The combined yield of rejected sites in a NL was 381. 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 farm 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 600m from Honi_18 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 restricting built development on higher ground to the south of the site.</p>
<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>

12.7 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 ⁷²	Housing –predominantly two storey (8.5m to ridge).
6. Scale of development ⁷³	Up to 300 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 5.4%.
7. Setting	The site is in LCT 3A: Upper farmed and wooded valley slopes. This is an ancient and settled landscape, containing patchworks of irregular fields and is relatively small in scale with an intimate feel. It has exceptionally high scenic quality, with landscape

⁷². Criteria 5, 6 and 7 are taken from the footnote to the NPPF

⁷³ 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>patterns visible from surrounding higher ground. Key characteristics of this LCT that are seen on the site and the surrounding areas are wide species rich hedges, winding narrow lanes, small to medium-size fields with irregular boundaries and stream habitats. The need for additional housing, development pressures, particularly around Honiton, together with linear growth of settlements along valleys, are identified as forces for change. A key landscape aim is to protect and enhance the historic fabric and existing landscape structure of small fields and woodlands, so that the landscape retains its special 'patchwork' character and spectacular views.</p> <p>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.</p>
8. Isolation ⁷⁴	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.
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 ⁷⁵	Medium impact – 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. The site and host landscape are in good condition, but quality is eroded somewhat by the overhead power lines, and proximity to the A30 and urban fringe towards the northern end.
13. Scenic quality	Medium impact – the site has some scenic qualities and contributes to attractive views from and to the National Landscapes. However, opportunities for such views from publicly accessible locations are very limited.



⁷⁴ Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) 'The Special Landscape Character'

⁷⁵ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

14. Relative wildness	Low/ medium impact – the site is part of the managed agricultural landscape with some horticultural use and buildings to the southern side of Northcote Hill. Land to the north of Northcote Hill is influenced by overhead power lines, the railway and A30 and urban fringe of Honiton. These influences diminish markedly east of the low ridge line and land east of this has a stronger sense of relative wildness.
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/ medium impact. Dumpdon Hill 2.6km to the north of the site is a National Trust owned historic hill fort and a designated scheduled monument. The site contributes to its setting but although it is prominent in views from the site, due to vegetation cover on its north side there are very limited locations from Dumpdon Hill from which the site is visible.
18. Would any of the special qualities summarised in the Blackdown Hills management plan be affected by the proposed development? ⁷⁶	No.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined ⁷⁷ ?	No

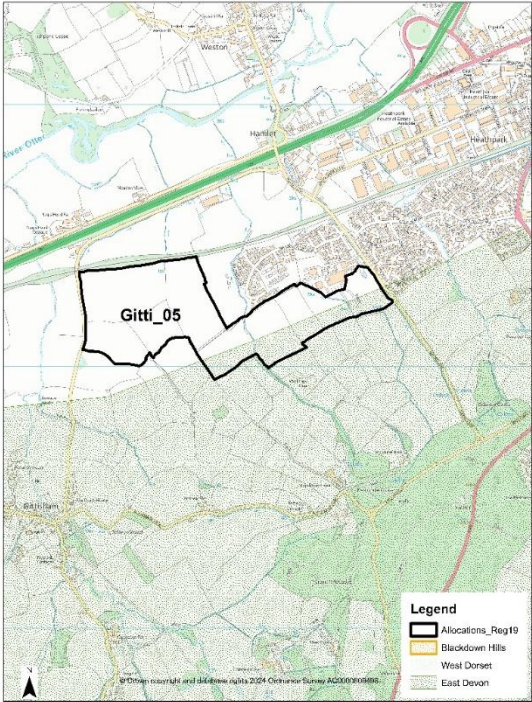

⁷⁶ See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf \(blackdownhillsaonb.org.uk\)](#)

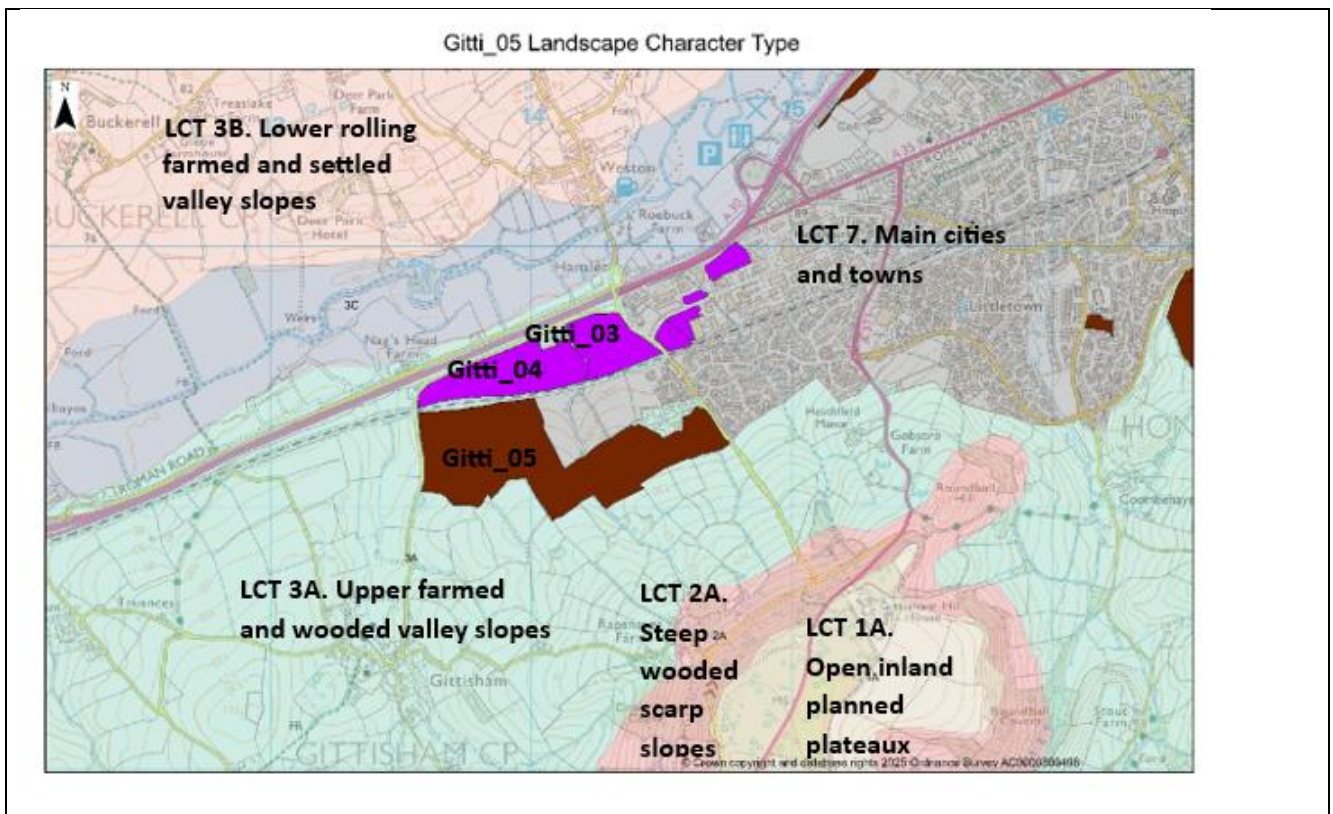
⁷⁷ Blackdown Hills [Management Plan](#) and extract of page 19 in Appendix 2

<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</p>	<p>No.</p>

constitute major with any combination of criteria?	
23. Major development?	No. The site is not within the national landscape and impacts on the national landscape would be minimal and capable of mitigation.

12.8 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
	



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	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 is in LCT 3A: Upper farmed and wooded valley slopes. This is an ancient and settled landscape, containing patchworks of irregular fields and is relatively small in scale with an intimate feel. It has exceptionally high scenic quality, with landscape patterns visible from surrounding higher ground. Key characteristics


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

	<p>of this LCT that are seen on the site and the surrounding areas are wide species rich hedges, winding narrow lanes and small to medium-size fields with irregular boundaries. The need for additional housing, development pressures, particularly around Honiton, together with linear growth of settlements along valleys, are identified as forces for change. A key landscape aim is to protect and enhance the historic fabric and existing landscape structure of small fields and woodlands, so that the landscape retains its special ‘patchwork’ character and spectacular views.</p> <p>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.</p>
8. Coastal scenery ⁸⁰	No impacts.
9. Heathland commons	No impacts
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 ⁸¹	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.

⁸⁰ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

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

<p>17. Cultural heritage</p>	<p>Medium impact – the western edge of the site is close to the historic village of Gittisham, which is in the EDNL.</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 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.</p>
<p>20. Photos</p>	 <p>Looking northwest from Hayne Lane at eastern end of the site.</p>

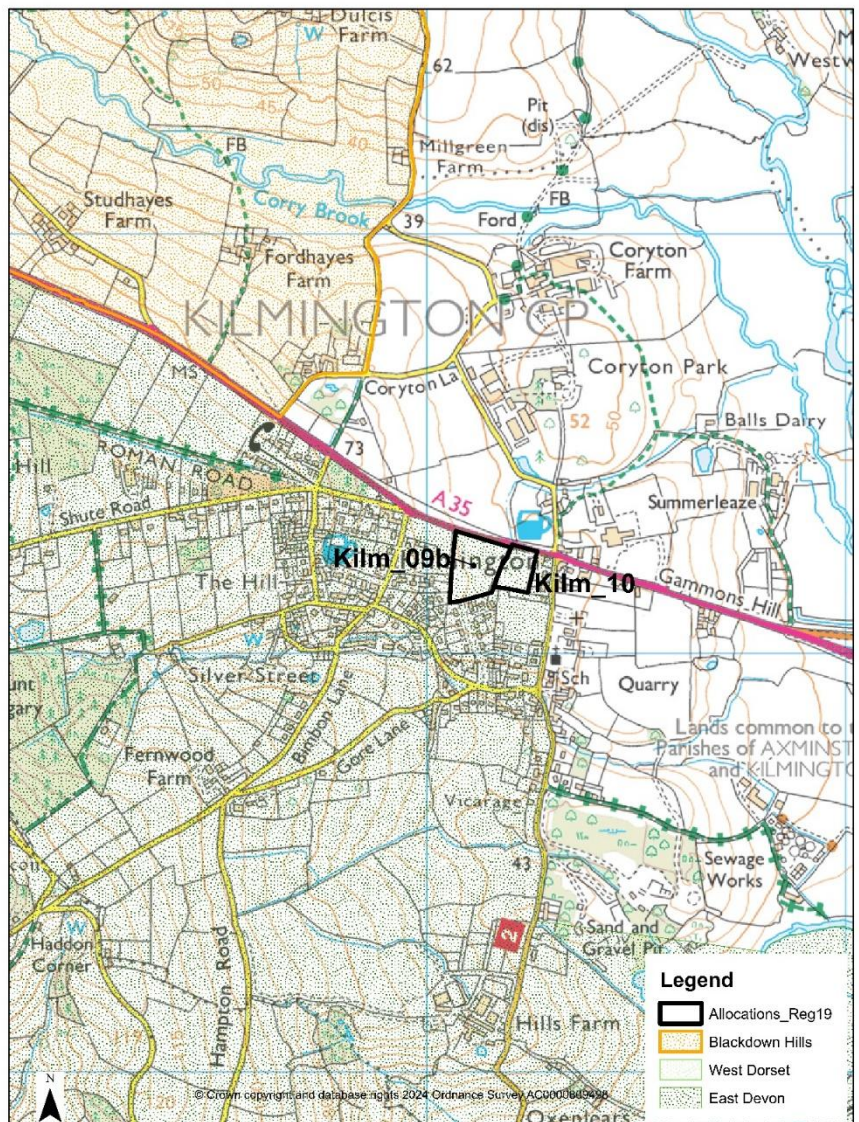
	 <p data-bbox="501 658 1161 689">Looking east from lane to Gittisham to west of the site.</p>
<p data-bbox="156 745 448 853">21. Would allocation constitute major on one criterion?</p>	<p data-bbox="488 745 528 777">No</p>
<p data-bbox="156 884 448 1032">22. Would allocation constitute major with any combination of criteria?</p>	<p data-bbox="488 884 528 916">No.</p>
<p data-bbox="156 1059 448 1090">23. Major development?</p>	<p data-bbox="488 1059 528 1090">No.</p>

13. Kilmington

Kilmington is a village located within the East Devon National Landscape (EDNL). Two sites are proposed for 28 dwellings, Kilm_09 and Kilm_10, and these are located together. Given the potential cumulative impact on the NL, they have been assessed jointly and are not considered to constitute major development in the context of the national landscape.

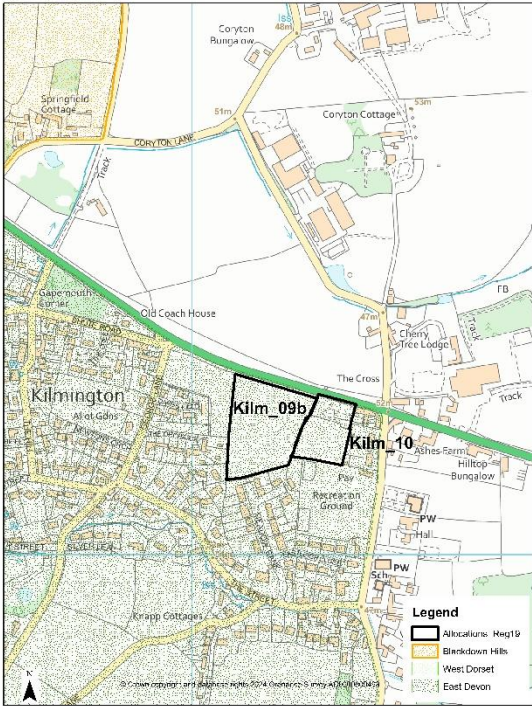

Development of the sites could result in limited conflicts with the purpose of conserving and enhancing the natural beauty of the EDNL as identified in the assessment. These impacts can largely be mitigated and the allocations are justified in the context of the local plan strategy to allow limited development in Kilmington.

The potential for Kilm_09a and Kilm_10 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty is set out in the table below, together with how the local plan can help to deliver this.



Site	Opportunities to conserve and enhance natural beauty	Actions
Kilm_09b and Kilm_10	<p>These sites, together with the majority of Kilmington, are within the East Devon National Landscape. They form the remaining piece of open land between the main village and the Roman road that largely defines the northern boundary of Kilmington. There is development to the south, east and west of the sites with the busy A 35 trunk road to the north. The allocations are therefore well related to the historic settlement pattern. Land to the north of the allocations is not within a national landscape.</p> <p>Historic mapping shows field boundaries unchanged since the 19th Century and the Devon Historic Environment Record states that field names (Ashen Hill) suggest Roman or Medieval ironworking.</p>	<p>Plan policy for both sites requires very careful design to take account of the National Landscape setting. Site Kilm_09b also makes reference to a comprehensive development layout to include the adjacent neighbourhood plan allocation (Kilm_09a). This requires a minimum 10 metre landscape buffer to the north, an east-west pedestrian and cycle path and adherence to the village design statement, including some stone elevations and slate roofs.</p> <p>The wording should be amended to refer to the need to conserve and enhance the natural beauty of the site and its wider landscape setting.</p>

13.1 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
	

Kilm_09 and Kilm_10 Landscape Character Type	
5. Nature of development ⁸²	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 ⁸³	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 site forms part of LCT 3B: Lower rolling farmed and settled slopes. Key characteristics of this landscape type relevant to the site and its context are that it is a well settled, medium scale landscape with hedgerow trees and patches of woodland. Forces for change in this LCT

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

	<p>include where settlement expansion does not fit with the traditional settlement pattern.</p> <p>The immediate context of the sites 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.</p>
8. Coastal scenery ⁸⁴	No impacts.
9. Heathland commons	No impacts
10. Elevated land	No impacts.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ⁸⁵	Medium - the site comprises two fields that are largely surrounded by development, with the A35 trunk road to the north.
13. Scenic quality	Medium - the site has some scenic quality from its open agricultural use and the boundary trees.
14. Relative wildness	Low - the site has low levels of wildness, being set within the overall envelope of Kilmington.
15. Relative tranquillity	Low - the adjoining uses and traffic on the very busy adjoining trunk road restrict levels of tranquillity.
16. Natural heritage features	Medium - the site is largely surrounded by mature trees, which should be retained.
17. Cultural heritage	High - 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	No.

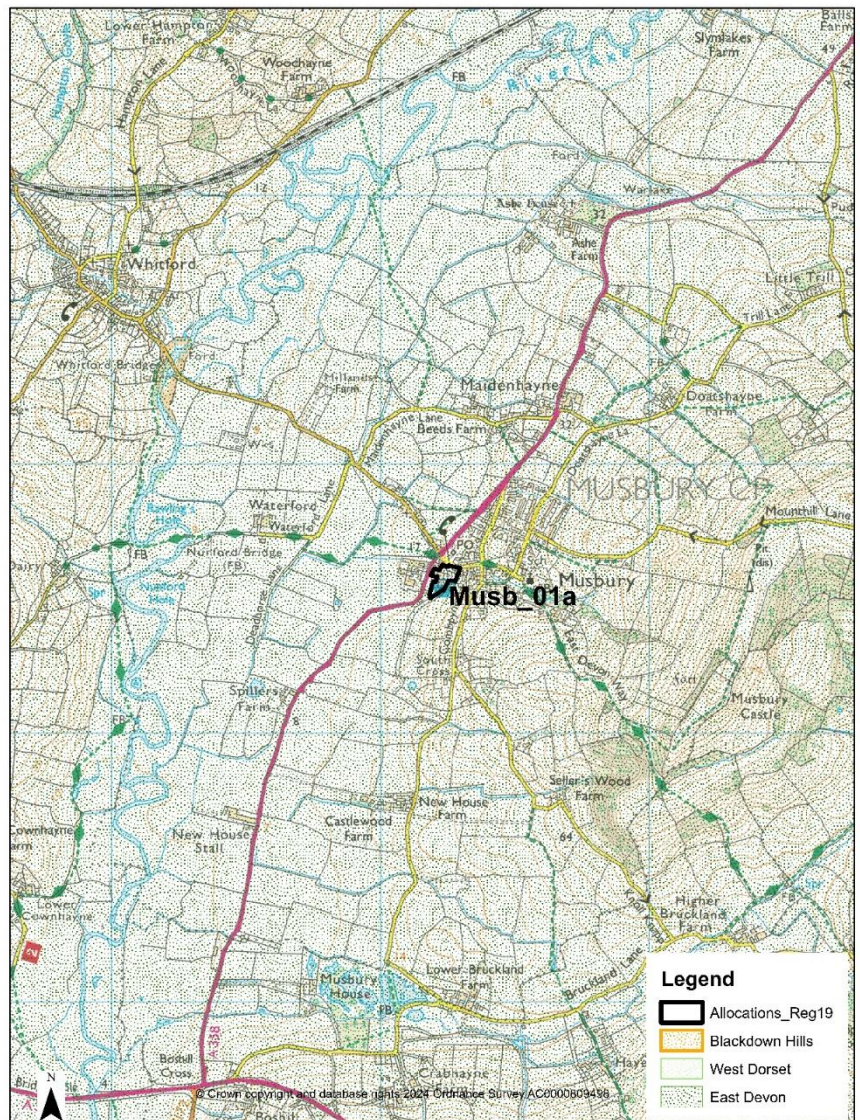
⁸⁴ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

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

14. Musbury

Musbury is a village located within the East Devon National Landscape (EDNL). One site is proposed for housing and employment, Musb_01a. Development of the site would have largely positive impacts on the purpose of conserving and enhancing the natural beauty of the EDNL as identified in the assessment. The allocation is justified in the context of the local plan strategy to allow limited development in Musbury, where all of the other potential allocation sites are also located within the national landscape and would have a far greater impact on its special qualities. The allocation is not considered to constitute major development in the context of the national landscape.

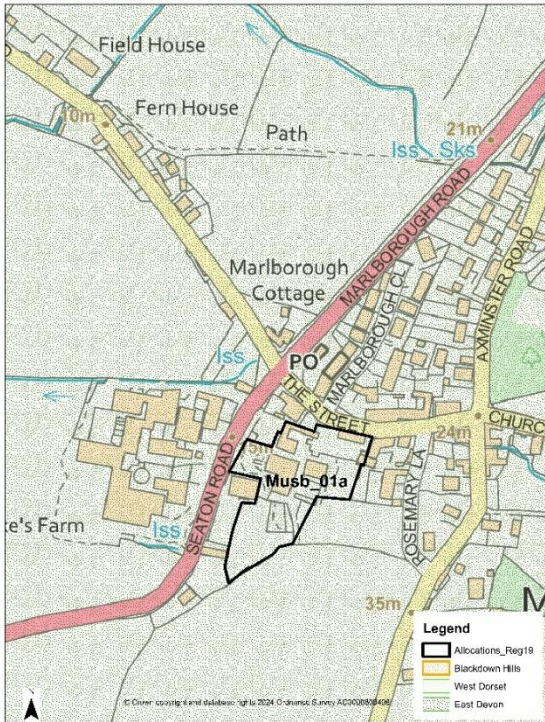
The potential of Musb_01 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty is out in the table below, together with how the local plan can help to deliver this.



Site	Opportunities to conserve and enhance natural beauty	Actions
Musb_01a	<p>The Devon Historic Environment Record shows part of the site as forming the historic village core with the remainder being apple orchards.</p> <p>Large parts of the site are covered by dilapidated agricultural buildings of a modern design interspersed with areas of concrete surface associated with the former agricultural use. Their replacement with housing and small employment buildings of an appropriate design will result in significant improvements to the appearance of Musbury and enhance its relationship with its rural, national landscape setting. The conversion of older farm buildings, which are heritage assets, will enable their retention and thereby benefit the national landscape.</p>	<p>Policy SD21 requires a ‘high quality design which is likely to require some conversion and some new build’. The policy also refers to a Development Brief that has been prepared for most of the site. The policy wording could be strengthened to incorporate key principles identified through the development brief, specifically:</p> <ul style="list-style-type: none"> • That the historic buildings are retained and sympathetically converted whilst the modern buildings are removed • All development contributes positively to the Conservation Area and the wider national landscape • A pedestrian link is provided through the site, accessing The Street • To reflect the pattern typical of traditional village centre housing in Musbury, new development should be concentrated along the access road and closer to existing buildings • New development and retained buildings are oriented east-west and north-south reflecting the traditional settlement pattern in the village • The housing density decreases to the south and east of the site, so that larger gardens and planting soften the transition from development to the adjacent countryside • Views through the site, particularly from the Conservation Area, are retained.

14.1 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 ⁸⁶	<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 ⁸⁷	<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>


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

7. Setting	<p>The site forms part of LCT 3B: Lower rolling farmed and settled slopes. Key characteristics of this landscape type relevant to the site and its context are that it is a well settled landscape with winding, sunken lanes and a landform that slopes up from the valley floor. There are views across the valley and higher land in other LCT's forms the backdrop to views.</p> <p>Forces for change in this LCT include where settlement expansion does not fit with the traditional settlement pattern, dilapidated farm buildings and a decline in apple farming. Landscape aims include finding alternative uses for redundant farm buildings and integrating any settlement expansion into the landscape through enhancing landscape character, for example through using fruit trees in traditional orchard areas, and avoiding stark lines of planting which do not respect the existing landscape pattern</p> <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>
8. Coastal scenery ⁸⁸	No impacts.
9. Heathland commons	No impacts
10. Elevated land	No impacts.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ⁸⁹	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.

⁸⁸ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

⁸⁹ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

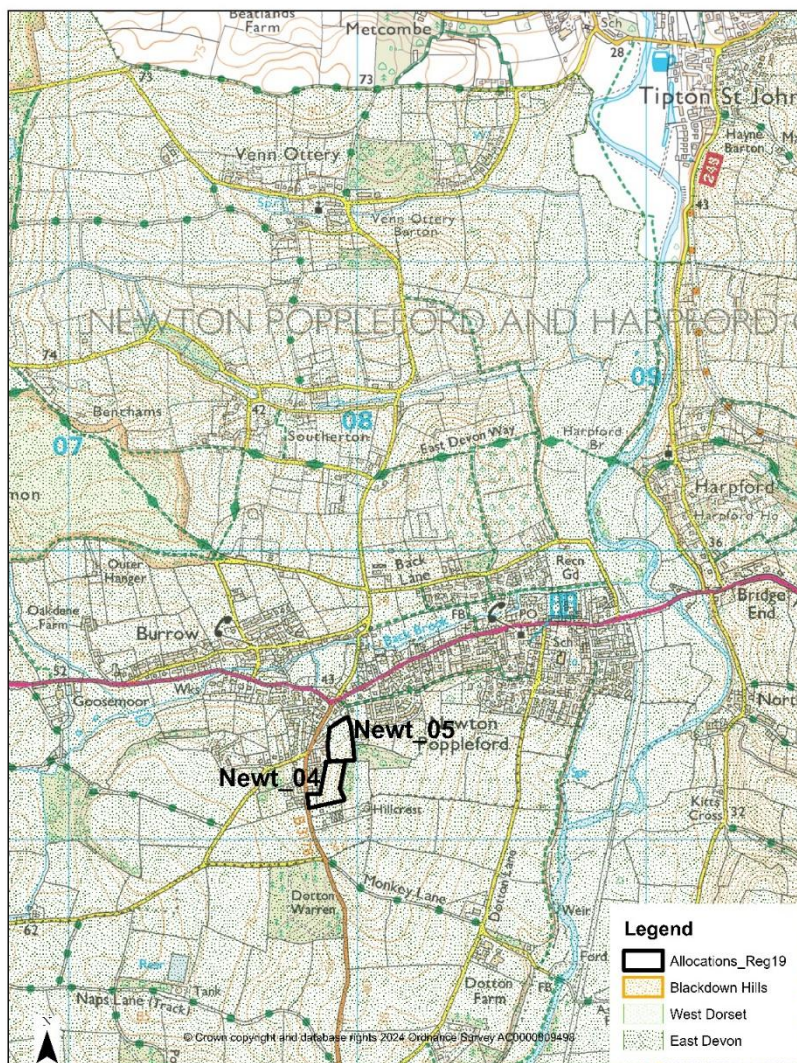
14. Relative wildness	The site has low levels of wildness, being a largely developed site at the edge of a village.
15. Relative tranquillity	The adjoining housing and traffic on the adjacent A358 restrict levels of tranquillity.
16. Natural heritage features	None.
17. Cultural heritage	The site includes 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	

<p>Former agricultural buildings</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. 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 potential 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).

Development of the sites could result in conflicts with the purpose of conserving and enhancing the natural beauty of the EDNL as identified in the assessment. These impacts could be mitigated to a large extent, subject to a reduction in the number of dwellings from 55 to 40. The allocation is justified in the context of the local plan strategy to allow limited development in Newton Poppleford, where all of the other potential allocation sites are also located within the national landscape and the development of these sites will result in wider community benefits through the provision of an alternative access for pedestrians and cyclists that avoids the traffic ‘pinch point’ at the mini-roundabout. The allocation is considered to constitute major development in the context of the national landscape which is justified by exceptional circumstances.

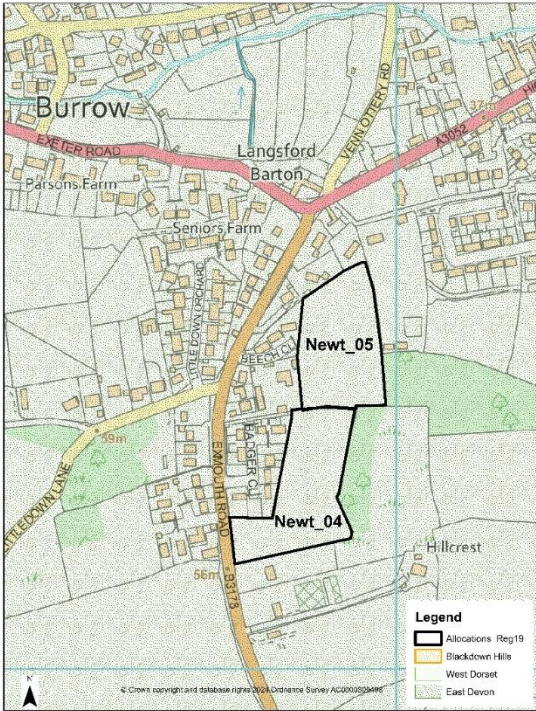
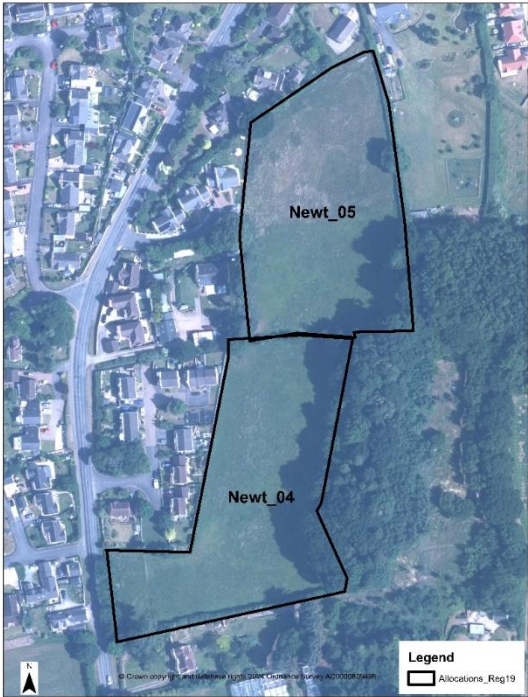


The potential of Newt_04 and 05 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty are is out in the table below, together with how the local plan can help to deliver this.

Site	Opportunities to conserve and enhance natural beauty	Actions
Newt_04 and Newt_05	<p>Historic mapping indicates that development along Exmouth Road was very limited until the 20th Century, but around 40% of the original fields that Newt_04 and 05 formed part of have now been developed and the integrity of the original field patterns lost.</p> <p>This has eroded the pastoral setting for the distinctive, unspoilt, wooded skyline to the east of the sites, which provide local distinctiveness and orientation and is one of the special qualities of the EDNL. The degree of openness that currently provides a setting for the wooded skyline would inevitably be reduced through development. However, development could be designed so that housing and infrastructure do not break the skyline, retaining the unspoilt wooded ridge as a landscape feature. The site was allocated for 55 dwellings in the first regulation 19 plan. However, there will need to be a fairly significant buffer to the more steeply rising ground and the trees on the eastern site boundary. The site is further constrained by its configuration and the relationship with existing</p>	<p>Reduce the allocation from 55 dwellings to 40.</p> <p>Policy SD22 requires very careful design to take account of the sites landscape setting. It states that elevated parts of the eastern side of the site are especially sensitive and will require very careful planning at the design stage.</p> <p>The wording should be amended to refer to the need to ensure that the development is informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting.</p> <p>The policy could be strengthened to refer to the importance of the wooded skyline as one of the special qualities of the national landscape and its importance in providing distinctiveness and orientation. The policy could require development proposals to establish how this could be reinforced through layout and design.</p> <p>The development of Newt_05 will deliver key improvements to pedestrian access from housing accessed off Exmouth Road to the services and facilities in the east of the village. Devon County Council as highways authority have commented that the allocation should be</p>

Site	Opportunities to conserve and enhance natural beauty	Actions
	dwellings on the western and northern boundary. Taking these factors into consideration, it is unlikely that more than 40 dwellings can satisfactorily be accommodated.	accompanied by a transportation masterplan. There is an opportunity to also require that pedestrian access be secured through Beech Close. This would improve opportunities for existing residents to access improved footpath links away from busy routes with poor or non-existent pavements.

15.1 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 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	40 dwellings. Newton Popleford has a population of around 1784 which equates to 853 homes. The percentage increase in the number of homes would be around 4.6%.
7. Setting	The site forms part of LCT 3B: Lower rolling farmed and settled slopes. Key characteristics of this landscape type relevant to the site and its context are that it is a well settled landscape with winding, sunken lanes with tall earth banks and many hedgerow trees. It is a relatively sheltered and

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

	<p>enclosed landscape with a well settled character. Forces for change in this LCT include where settlement expansion does not fit with the traditional settlement pattern and a landscape aim is that, where settlements expand, this is done in a way which enhances their character and setting. Landscape guidelines include enhancing the Public Rights of Way network and ensuring appropriate measures to soften the settlement edge to integrate development into the landscape.</p> <p>The site is located within the EDNL and is bounded by housing on two sides. It comprises two fields that slope up with increasing steepness from the west to a wooded ridge (outside the site) that forms an attractive skyline feature. Modern housing and vegetation along the western boundary shields much of the site from public view, but the southern end of Newt_05 has a frontage with Exmouth Road which provides a gateway view up to the wooded ridge. There is also potential for views over or through the sycamore hedge which currently forms the roadside boundary, particularly in winter.</p>
8. Coastal scenery ⁹²	No impacts.
9. Heathland commons	Slight impact. The site is partially visible from an elevated area of access land on Hawkerland Common 1.7km to the west but in these views will be seen in the context of existing adjacent housing and set against the wooded ridgeline behind.
10. Elevated land	The site is set higher than nearby housing development and is situated adjacent to a visually important wooded skyline. Distinctive, unspoilt, wooded skylines providing local distinctiveness and orientation are one of the special qualities of the EDNL and developing the steeper, more elevated parts of the site could have a detrimental impact on this character.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ⁹³	The site comprises two field parcels under improved grassland bounded by hedges and trees, with modern housing on two sides. The wooded

⁹² Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

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

	ridge to the east forms part of the distinctive setting of Newton Poppleford
13. Scenic quality	Medium - Views of the site are limited to glimpse near views between breaks in housing along Exmouth Road to the west, views from modern housing backing onto it and long distance, partial views from the west, northwest and northeast. The limited views of the site and influence of adjacent modern housing reduce the contribution it makes to overall scenic quality although the wooded ridgeline beyond is an important landscape feature.
14. Relative wildness	Low - The site has low levels of wildness, being part of an agricultural landscape adjoining the village.
15. Relative tranquillity	Low - The adjoining housing and traffic on the nearby road restrict levels of tranquillity.
16. Natural heritage features	Medium - There are native hedges and mature trees to most of 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?	Potentially, 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	

15.2 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
<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>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 4.6%. When existing permissions are taken into account the increase in houses rises to around 5.8%. This level of growth is compatible with the 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>Development options in Newton Poppleford are severely limited by a range of constraints, but five sites in 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 A3052, 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</p>

	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, 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. Limiting vehicular access to Beech Close and possibly Badger Close would enable retention and reinforcement of existing hedgerow to Exmouth Road frontage. Tree planting to the northeast boundary would provide screening to long distance views from East Hill.
What is the predicted environmental impact? Can any detrimental impacts be mitigated?	The site is within the Pebblebed Heaths habitat mitigation zone and adjacent to a woodland nature recovery network. Significant moderate adverse impacts are predicted.
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 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.

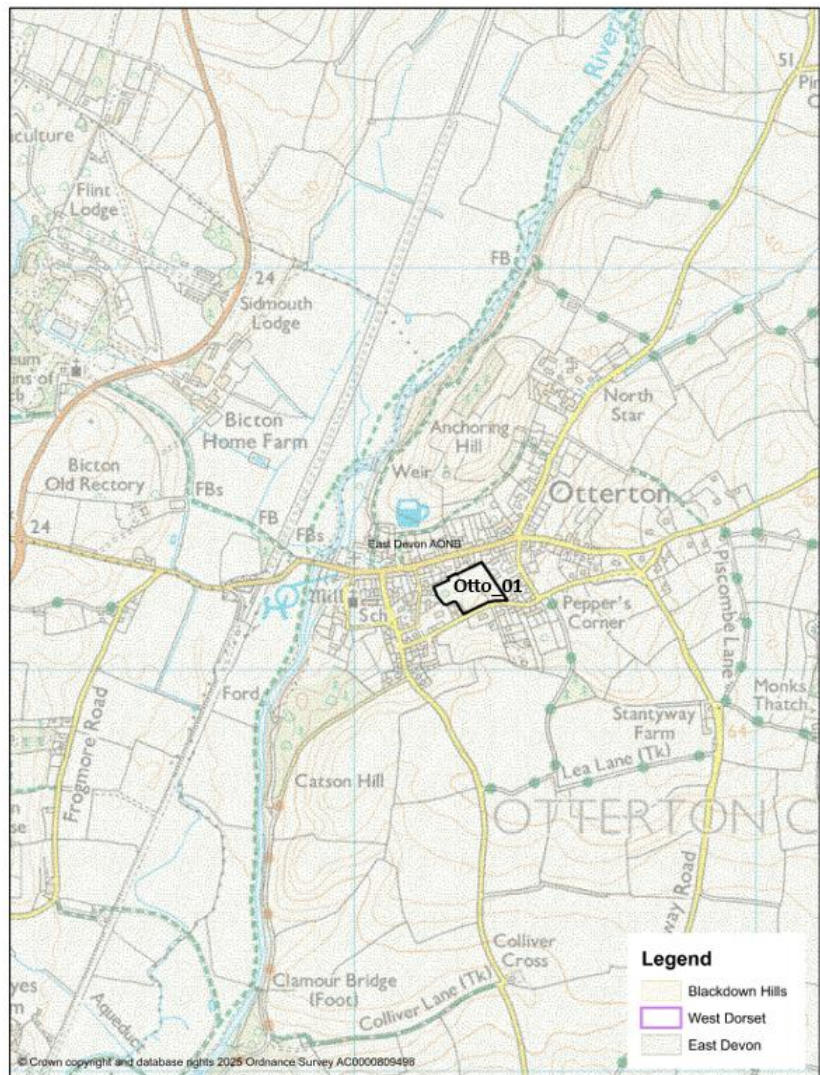
16. Otterton

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

Development of the site could result in conflicts with the purpose of conserving and enhancing the natural beauty of the EDNL as identified in the assessment. The allocation is justified in the context of the local plan strategy to allow limited development in Otterton, where all the alternatives are also located in the EDNL and are either at risk of flooding or would have a greater landscape impact.

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

The potential of Otto_01 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty are is out in the table below, together with how the local plan can help to deliver this.

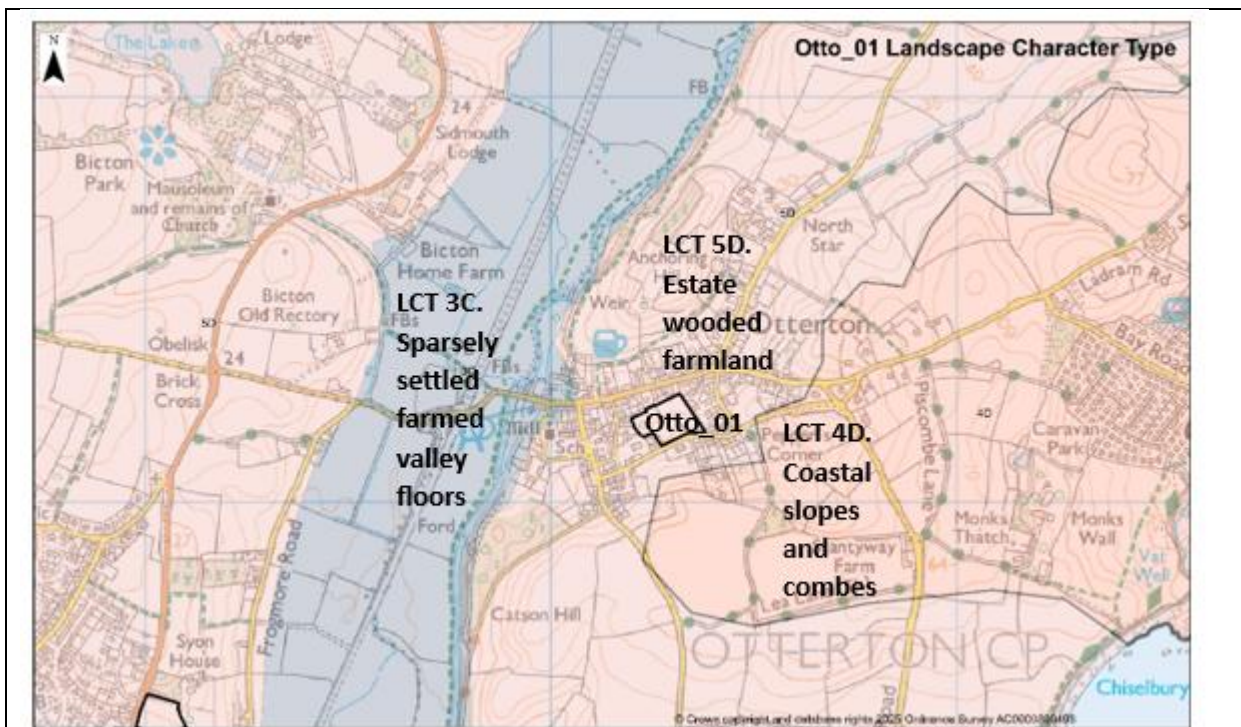


Site	Opportunities to conserve and enhance natural beauty	Actions
Otto_01	<p>This site is adjacent to the historic core of the village and surrounded by housing. The Tithe map, which was produced post 1836, shows the site as forming part of a network of plots behind the historic properties along Fore Street.</p> <p>By the time of the 1888 – 1890 map, the western plots had been combined and subsequently the eastern plots were combined to form the current field pattern of two small field separated by a curving hedge with mature trees.</p> <p>The Devon County Council Historic Environment Record shows the western field as a surviving orchard. It states that the eastern field was probably first enclosed with hedge-banks during the later middle ages, the curving form of the hedge-banks suggesting that earlier it may have been farmed as open strip-fields. It has a recorded field boundary loss of 50%.</p> <p>Housing was built to the south, east and west of the Otto_01 in the 20th Century.</p> <p>Short range views into the site are heavily filtered by buildings and vegetation, but the two field accesses afford attractive views over the site and village towards the hill to the north (although views are screened/filtered by mature trees) in the boundary between the two fields that form the site. Longer range views of the site are available from the public footpath on the hill to the north of the village. From here, the site is viewed as an open area, but views are filtered through mature trees and the backdrop to the site is fairly modern</p>	<p>The wording should be amended to refer to the need to ensure that the development is informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting.</p> <p>Policy SD23 states that Otto_01 is allocated for 10 homes and that there are significant heritage and landscape constraints. The northwestern part of the site is not appropriate for built development and should be kept open and made available as a community open space/orchard or similar use. This approach will help to enhance the EDNL through providing for the retention and restocking of part of a historic orchard.</p> <p>Policy SD23 also states that development should be very carefully designed to</p>

Site	Opportunities to conserve and enhance natural beauty	Actions
	housing and a steeper scarp slope behind with trees and hedging on the skyline.	ensure that it is compatible with the National Landscape. Text should be added to ensure the retention of views from Behind Hayes across the site and to the hill to the north.

16.1 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 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	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	This site lies within LCT 5D: Estate wooded farmland and forms the wider landscape setting of the Bicton estate. Key characteristics of this site and its surroundings include winding rural roads, rolling hills and ridges of pastoral farmland and the nucleated historic and estate village of Otterton. A likely cause of change identified is the erosion of distinctive character of settlements and their landscape setting. The landscape


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

	<p>guidelines include new buildings being sympathetic to existing buildings. This site is also close to and is seen from some views in the context of LCT 4D: Coastal slopes and combs. This comprises a series of incised branching valleys which run down to pebbly bays at the coast.</p> <p>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.</p>
8. Coastal scenery ⁹⁶	No impacts.
9. Heathland commons	No impacts
10. Elevated land	No impacts.
11. Agricultural valley bottoms	Medium - The site comprises two small fields close to the valley bottom, although on steeply sloping land.
12. Landscape quality ⁹⁷	High - 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	High - 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	Low - The site has low levels of wildness, being part of a managed landscape within a village setting.
15. Relative tranquillity	Medium - The landscape quality of the site is high, but the location within the village diminishes some of its rural character and tranquillity.

⁹⁶ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL 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>16. Natural heritage features</p>	<p>Medium - There is a group of mature trees forming a hedge line within the site.</p>
<p>17. Cultural heritage</p>	<p>High - Parts of the site help to provide an attractive 'rural' backdrop for a number of listed buildings along Fore Street.</p>
<p>18. Would any of the special qualities summarised in the East Devon management plan be affected by the proposed development?</p>	<p>Yes. Development of the site also has the potential to impact on the setting of heritage assets and the scenic beauty and landscape quality.</p>
<p>19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?</p>	<p>No</p>
<p>20. Photos</p> <p>Zoomed in image of site viewed from footpath to north.</p> <p>Site viewed from the south</p>	

21. Would allocation constitute major on one criterion?	Yes, potential impact on landscape and scenic quality.
22. Would allocation constitute major with any combination of criteria?	Yes, landscape quality, scenic quality and cultural heritage.
23. Major development?	Yes.

16.2 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 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 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.

<p>What is the predicted environmental impact? Can any detrimental impacts be mitigated?</p>	<p>The site is around 42 metres from the 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>
<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>

17. Sidbury

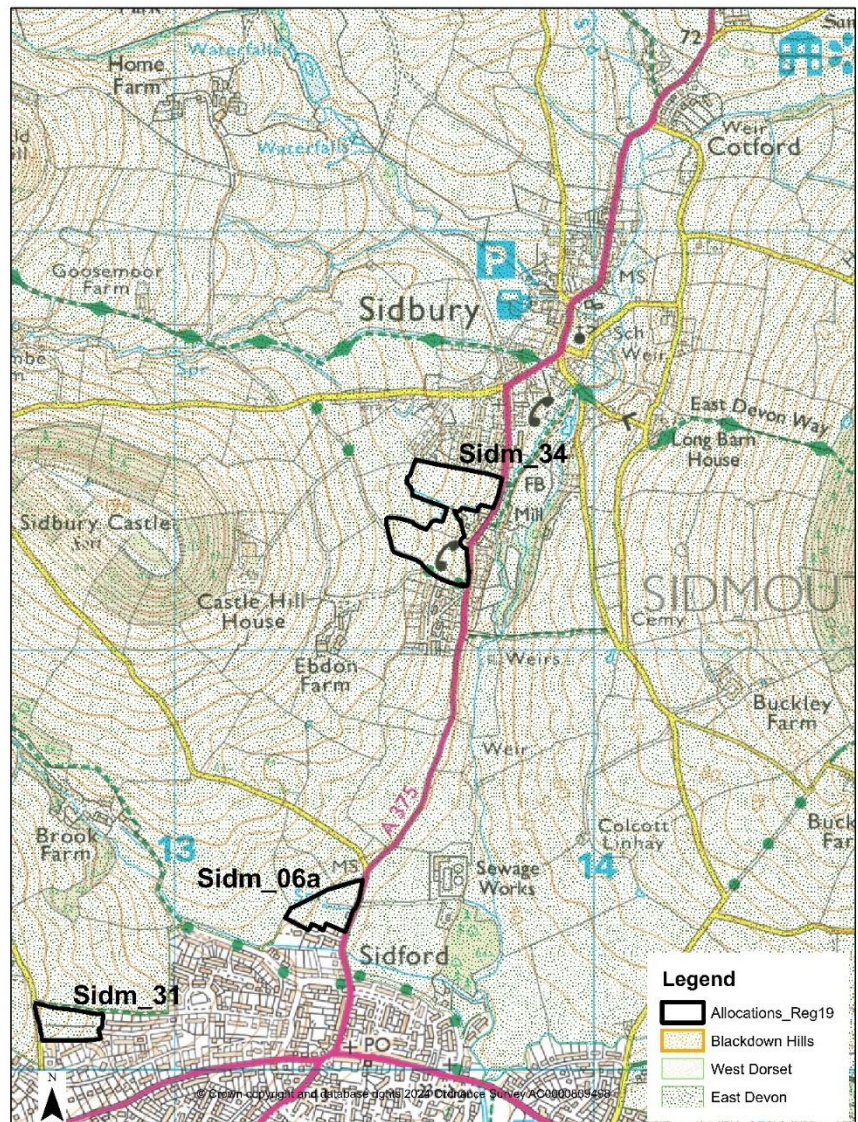
Sidbury is a village located within the East Devon National Landscape (EDNL). Only one site was considered to be a reasonable alternative in Sidbury and it is allocated for 43 dwellings.

Development of the site could result in significant conflicts with the purpose of conserving and enhancing the natural beauty of the EDNL as identified in the assessment. These impacts could be mitigated to some extent. The allocation is justified in the context of the local plan strategy to allow limited development in Sidbury, where there are no alternative sites and this site will facilitate significant improvements to active travel routes.

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

There is a planning application pending for Sidm_34 (24/2434/MOUT).

The potential of Sidm_34 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty is set out in the table below, together with how the local plan can help to deliver this.



Site	Opportunities to conserve and enhance natural beauty	Actions
Sidm_34	<p>There is an outline planning application on this site for up to 43 dwellings, associated access, landscaping and open space and the second phase of the Sidford to Sidbury multi-use path⁹⁸. The landscaping strategy supporting the application shows no development on higher land to the west of the site. It includes an orchard on the lower slopes, with areas of wildflower meadow on the undeveloped slopes. Mixed native hedge banks, new native tree planting and woodland/hedgerow wildflowers separate the new dwellings from the open spaces. Wetland meadow planting is shown on the lower slopes.</p> <p>Historic mapping shows that the northern part of the site was divided into two fields from the 19th Century until the 1951 – 1992 map. The aerial photographs show it as two fields in 1947 but as one field in 1999. The Devon Historic Environment Record historic landscape character shows the middle portion of the site as an orchard. The planting of trees, hedgebanks and fruit trees is appropriate to the historic landscape character.</p> <p>New pedestrian and cycle links to form an alternative to the busy A375 are included. This would help to provide improved pedestrian and cycle links within the village and could</p>	<p>Policy SD26 states that particular care will be needed to avoid adverse impacts on the national landscape, especially on higher westerly site parts where open space provision may be appropriate.</p> <p>The wording should be amended to refer to the need to ensure that the development is informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting.</p> <p>In terms of the multi-use path, Policy SD26 states that “Development would be expected to play its role in delivering part of the Sidbury to Sidmouth cycle route through the allocation”. This</p>

⁹⁸ [24/2434/MOUT | Outline planning application for the erection of up to 43 residential dwellings, with associated access, landscaping and open space, as well as the provision of the second phase of the Sidford to Sidbury multi-use path \(all matters reserved save for access\) | Land Adjacent Furzehill Burnt Oak Sidbury](#)

Site	Opportunities to conserve and enhance natural beauty	Actions
	form part of a strategic scheme to provide an improved link between Sidford and Sidbury ⁹⁹ .	wording could be strengthened to require delivery of the finished route in accordance with an agreed timescale,

⁹⁹ [Sidbury to Sidford Cycle Route - Have your say](#)

17.1 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 ¹⁰⁰	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 ¹⁰¹	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	The majority of the site forms part of LCT 3B: Lower rolling farmed and settled slopes. Key characteristics of this landscape type relevant to the site and its context are that it is a well settled landscape with a gently rolling landform sloping up from the valley floor, winding lanes and views across valleys and higher land in other LCT’s forming the backdrop for views. Forces for change in

¹⁰⁰. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

¹⁰¹ 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>this LCT include where settlement expansion does not fit with the traditional settlement pattern and a landscape aim is that, where settlements expand, this is done in a way which enhances their character and setting.</p> <p>Some of the higher ground of the site is in LCT 3A: Upper farmed and wooded valley slopes. This is an ancient and settled landscape, containing patchworks of irregular fields and is relatively small in scale with an intimate feel. It has exceptionally high scenic quality, with landscape patterns visible from surrounding higher ground. Key characteristics of this LCT that are seen on the site and the surrounding areas are a well treed and pastoral landscape, small to medium-size fields with irregular boundaries and very winding narrow lanes. Development pressures are identified as a force for change. A key landscape aim is to protect and enhance the historic fabric and existing landscape structure of small fields and woodlands, so that the landscape retains its special ‘patchwork’ character and spectacular views.</p> <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>
8. Coastal scenery ¹⁰²	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.

¹⁰² Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

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 existing settlement, particularly to the north reduces susceptibility to detrimental impacts on this feature to some extent.
12. Landscape quality ¹⁰³	The site is in good condition with an intricate pattern of fields and hedges and makes a positive contribution to local landscape character notwithstanding existing development to the north..
13. Scenic quality	High - The site and surrounding landscape is of high scenic quality contributing to attractive views from the east side of the valley to Sidbury Castle and East Hill.
14. Relative wildness	Low - The site has low levels of wildness, being part of an agricultural landscape at the edge of a village.
15. Relative tranquillity	Medium - The adjoining housing and traffic on the adjacent A376 restrict levels of tranquillity.
16. Natural heritage features	Medium - The site contains a number of irregularly shaped historic hedges with numerous trees
17. Cultural heritage	High - 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 13.
19. Is there a significant adverse impact on the purposes for which the area has been designated or defined?	No

Sidbury Castle.

¹⁰³ 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 from cemetery car park west towards Sidbury Castle with site highlighted in yellow.</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</p>
<p>23. Major development?</p>	<p>Yes</p>

17.2 Exceptional Circumstances Assessment

Form 3: Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Sidm_34
<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>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.</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>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.</p>
<p>Are there any cumulative impacts on the national landscape from other proposed allocations?</p>	<p>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.</p>
<p>What is the predicted landscape impact? Can any detrimental impacts be mitigated?</p>	<p>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. Steep slopes could</p>

	<p>result in extensive alterations to ground levels to accommodate development. Development of the site would visually link the existing housing estates of Furzehill and Hillside creating the appearance of a much larger settlement and cutting across attractive views to Sidbury Castle from the east side of the valley. Retaining existing trees and hedges and provision of extensive tree planting in addition to limiting development to the lower (but steeper) parts of the site would help to partially mitigate the landscape and visual effects of the development. Overall, the site has a high-medium landscape sensitivity to new development.</p>
<p>What is the predicted environmental impact? Can any detrimental impacts be mitigated?</p>	<p>Fields surrounded and divided by mature hedgerows and trees with potential to be impacted by development. The site is 10m from an unconfirmed wildlife site, 31m from a nature recovery network area and 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>

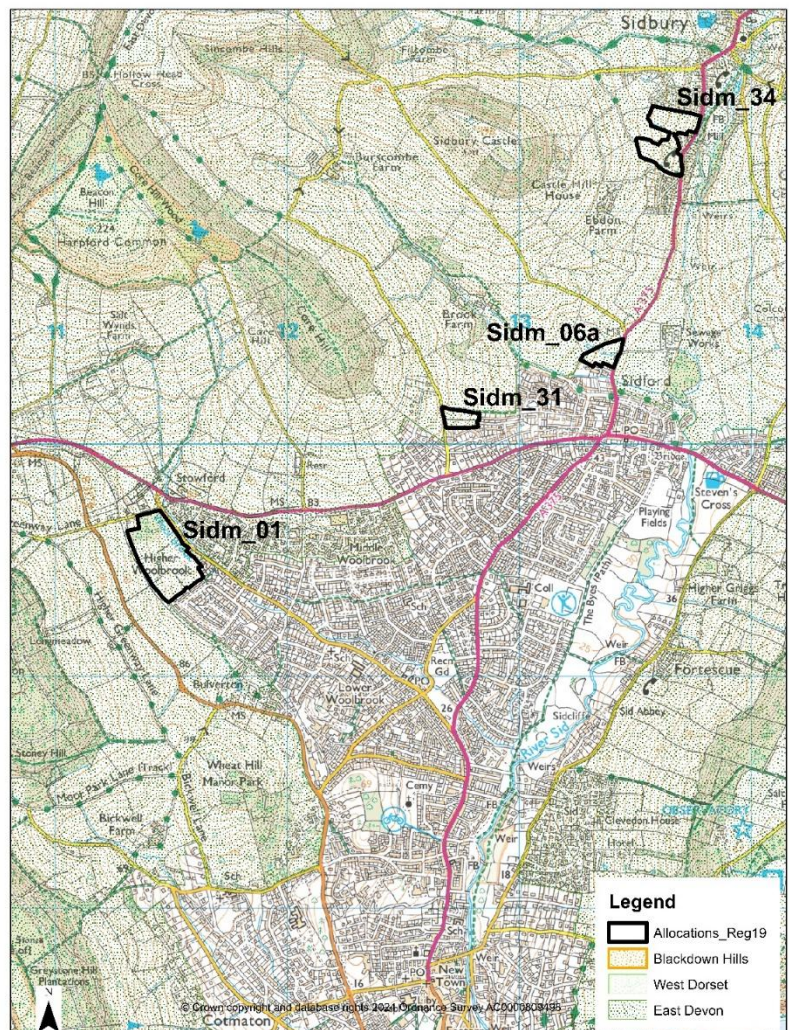
18. Sidmouth

Sidmouth is enclosed by the East Devon National Landscape (EDNL) and the sea. 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.

Development of these sites could result in some conflict with the purpose of conserving and enhancing the natural beauty of the EDNL as identified in the assessment. The impacts could be mitigated to a large extent and the allocation is justified in the context of the local plan strategy to promote significant development at Sidmouth.

Two of the allocations are considered to constitute major development in the context of the national landscape which is justified by exceptional circumstances (Sidm_01 and Sidm_06a). There is a planning application pending for Sidm_31 (25/0356/MOUT).

The potential of Sidm_01, 06a and 31 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty are out in the table below, together with how the local plan can help to deliver this.

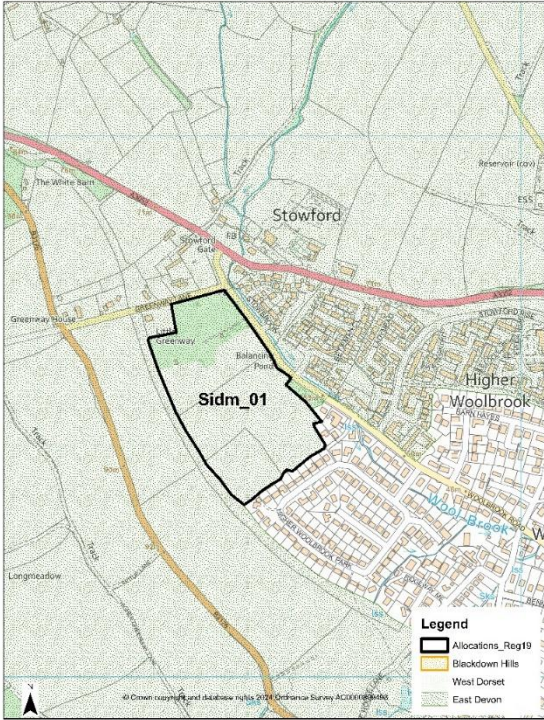



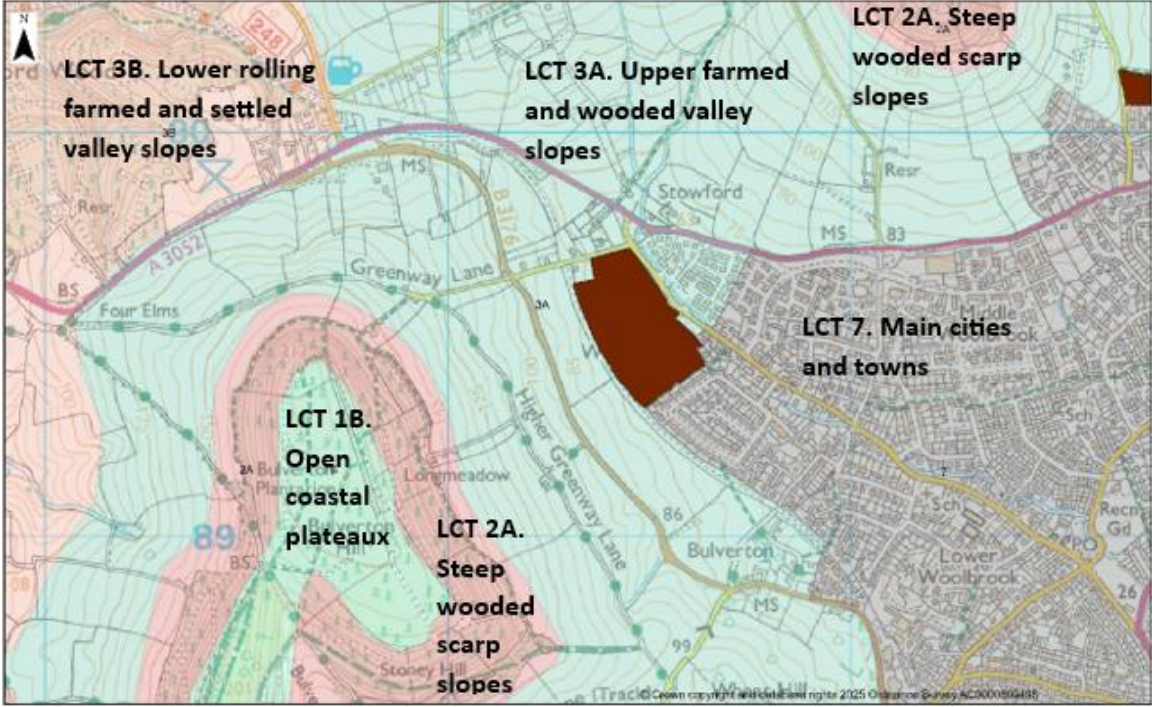
Site	Opportunities to conserve and enhance natural beauty	Actions
Sidm_01	<p>The site comprises three relatively flat fields on the valley bottom that are separated by low, well managed hedgerows with some mature trees. There is also a small area of woodland in the north of the site.</p> <p>Key characteristics of the local landscape are hedges, earth banks and small woodlands. The Devon Historic Environment Record shows that the site is part of an area with 56% field boundary loss.</p> <p>The integration of new development into the wider landscape would be helped by enhancing the existing features and incorporating new hedges and earth banks into the design.</p> <p>The site also has the potential to enhance the Public Rights of Way network by providing cycle and pedestrian routes away from Woolbrook Rd, which lacks a separate footway in the vicinity of the site and also links into Greenway Lane.</p>	<p>The wording should be amended to refer to the need to ensure that the development is informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting. The existing area of woodland to the north of the site should be retained and enhanced through an agreed landscaping scheme and new hedges and earth banks incorporated into the site layout.</p> <p>Consideration should be given as to how best to facilitate cycle and pedestrian paths through the site as an attractive alternative to Woolbrook Road.</p>
Sidm_06a	<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 site comprises a small field in the northeastern part of the site that is enclosed by mature hedges. The OS map shows a spring emerging in the middle of the site, and a watercourse is shown from it to the main road along the southern boundary of this field. The remainder</p>	<p>The local plan allocates this site for 30 new homes and states that development will need to play its part in supporting delivery of Devon County Council's Sidbury to Sidmouth cycle route.</p>

Site	Opportunities to conserve and enhance natural beauty	Actions
	<p>of the site forms part of a wider field which extends to the northwest of the site.</p> <p>Key characteristics of the local landscape are hedges, earth banks and small woodlands. The field pattern of this site appears to be unchanged since the 19th Century, although the Devon Historic Environment Record shows it to be part of a wider area with a 46% field boundary loss. A new hedge should be provided to the north of the site where there is currently no boundary. The existing mature hedgerow within the site should also be retained where possible and consideration given to how the spring line can be incorporated into the design.</p> <p>There is no separate footway along the A376 in the vicinity of the site and the County Council has plans to provide a cycle route between Sidbury and Sidford. The proposed cycle route takes up a wide strip of land along the site frontage and this, combined with the triangular shape of the site, and the need to make sure that new development integrates satisfactorily into the national landscape will reduce the number of dwellings that can be satisfactorily built on the site.</p>	<p>The policy wording should be amended to refer to the need to ensure that the development is informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting. This should incorporate the planting of a new boundary hedge to the northwest of the site, retention of existing hedgerows where possible and a suitable scheme for incorporating the spring into the development. Policy should be amended to refer to around 15 dwellings rather than 30.</p>
Sidm_31	<p>This small, grassed field is located on the edge of Sidmouth with housing to the south and east. The main landscape features are the hedgerows that enclose the site, particularly to the northern boundary with the adjacent public right of way which incorporates mature trees. Despite the elevated and sloping nature of the site, longer range views of it from the wider landscape are limited and seen in the context of the urban area.</p>	<p>The existing local plan policy requires very careful planning and use of materials to take full account of both the immediate context and views from the wider landscape, particularly when viewed from higher land to the east, and only single storey</p>

Site	Opportunities to conserve and enhance natural beauty	Actions
	<p>The field pattern of this site appears to be unchanged since the 19th Century, although the Devon Historic Environment Record shows it to be part of a wider area with a 66% field boundary loss.</p> <p>Landscape guidelines that would help to conserve and enhance the national landscape include the strengthening of existing boundary vegetation and planting within and across the site to reinforce the landscape buffer and filter views from outside of the site. This can be achieved through a relatively low density of development restricted to single storey dwellings with sensitive architectural detailing and use of materials.</p>	<p>dwellings will be appropriate.</p> <p>The wording should be amended to refer to the need to ensure that the development is informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting.</p>

18.1 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 ¹⁰⁴	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 ¹⁰⁵	160 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 2.5%.
7. Setting	The site is in LCT 3A: Upper farmed and wooded valley slopes. This is an ancient and settled landscape, containing patchworks of irregular fields and is relatively small in scale with an intimate feel. It has exceptionally high scenic quality, with landscape patterns visible from surrounding higher ground. Key characteristics of this LCT that are seen on the site


¹⁰⁴. Criteria 5, 6 and 7 are taken from the footnote to the NPPF


¹⁰⁵ 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>and the surrounding areas are deciduous woodland and a well treed pastoral landscape with arable cultivation on lower slopes. Development pressures are identified as a force for change. Landscape guidelines relevant to the site are to improve integration of new development into the wider landscape through characteristic landscape features such as hedges, earth banks and small woodlands and to enhance the Public Rights of Way network in order to connect existing routes and create circular trails.</p> <p>The site comprises three relatively level fields on the edge of the built-up area and includes a small area of woodland in the north of the site. There is housing on three sides 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.</p>
8. Coastal scenery ¹⁰⁶	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 Sid and the Wool Brook. However, there are very attractive views across the site towards higher ground, particularly towards Bulverton Hill.
12. Landscape quality ¹⁰⁷	The site contributes to local landscape character with its open agricultural use, and relationship to Bulverton Hill. However, from many

¹⁰⁶ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

¹⁰⁷ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

	views it is seen in the context of the wider town and adjoins a busy road with associated infrastructure.
13. Scenic quality	Medium - The site has some rural character and makes a positive contribution to some views of the wider National Landscape.
14. Relative wildness	Low - The site has low levels of wildness, being part of an agricultural landscape at the edge of a town.
15. Relative tranquillity	Medium - The adjoining housing and traffic on the adjacent road restrict levels of tranquillity.
16. Natural heritage features	Medium – the site includes field hedges and an area of woodland -.
17. Cultural heritage	Medium – there have been archaeological finds on the site and Greenway Lane to the north is thought to run along the line of a Roman road.
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
20. Photos Site highlighted yellow viewed from Fire Beacon.	

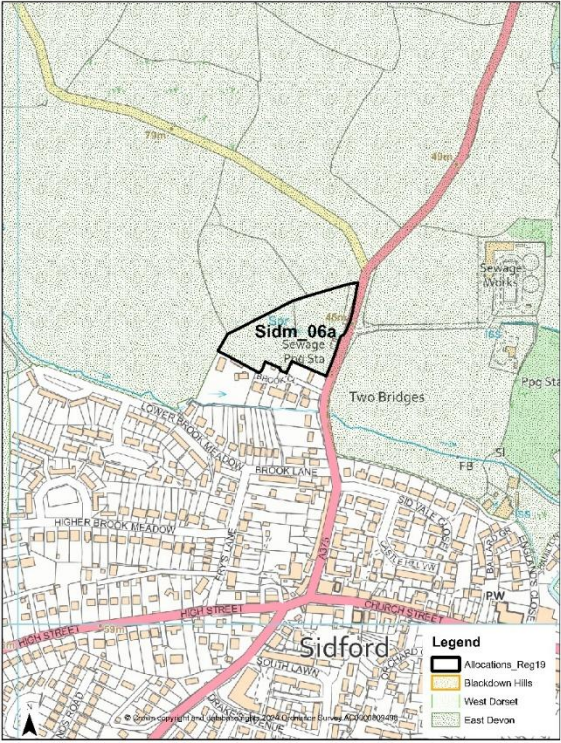

<p>Site viewed from Higher Woolbrook Park looking northeast.</p> <p>Looking towards Bulverton Hill with parts of site visible behind housing.</p>	
<p>21. Would allocation constitute major on one criterion?</p>	<p>No.</p>
<p>22. Would allocation constitute major with any combination of criteria?</p>	<p>Yes, whilst the scale of development is relatively minor in relation to the scale of Sidmouth, the development of the site could have a wider impact on the special qualities of the EDNL that indicate the allocation should be considered as major development.</p>
<p>23. Major development?</p>	<p>Yes</p>

18.2 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 190, which represents around 3% 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.

<p>Are there any 'exceptional circumstances' that would justify development in the 'public interest'.</p>	<p>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.</p>
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18.3 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
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Sidm_06a Landscape Character Type	
5. Nature of development ¹⁰⁸	<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 ¹⁰⁹	<p>15 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 0.2%.</p>
7. Setting	<p>The site is in LCT 3A: Upper farmed and wooded valley slopes. This is an ancient and settled landscape, containing patchworks of irregular fields</p>

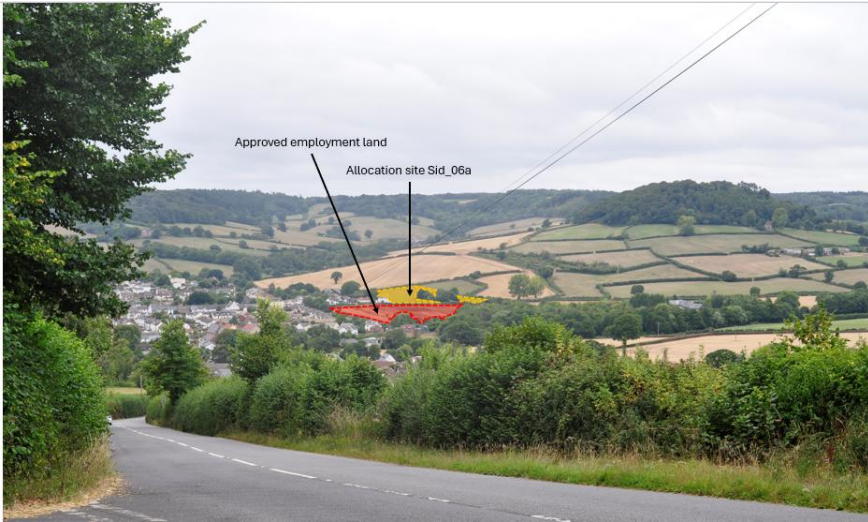
¹⁰⁸. Criteria 5, 6 and 7 are taken from the footnote to the NPPF


¹⁰⁹ 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>and is relatively small in scale with an intimate feel. It has exceptionally high scenic quality, with landscape patterns visible from surrounding higher ground. Key characteristics of this LCT that are seen on the site and the surrounding areas are a well treed pastoral landscape with arable cultivation on lower slopes and winding narrow lanes. Development pressures are identified as a force for change. Landscape guidelines relevant to the site are to improve integration of new development into the wider landscape through characteristic landscape features such as hedges, earth banks and small woodlands and to enhance the Public Rights of Way network in order to connect existing routes and create circular trails.</p> <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. The site comprises a small field with mature hedges, and a spring line is marked on the map along the southern boundary. The remainder of the site forms part of a wider field which extends to the northwest of the site.</p>
8. Coastal scenery ¹¹⁰	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. The site itself is low-lying.
11. Agricultural valley bottoms	Medium impacts – the site forms a small part of the valley bottom, and is seen partly in the context of the neighbouring urban area.
12. Landscape quality ¹¹¹	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.

¹¹⁰ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

¹¹¹ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

13. Scenic quality	Medium - The site has some rural character, but this is diminished by its location on the settlement edge, adjacent to the A376 with overhead wires and street lighting.
14. Relative wildness	Low - The site has low levels of wildness, being part of an agricultural landscape at the edge of a town.
15. Relative tranquillity	Low - The adjoining housing and traffic on the adjacent A376 restrict levels of tranquillity.
16. Natural heritage features	Medium - There are some boundary hedges with mature trees.
17. Cultural heritage	Low.
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
<p>20. Photos</p> <p>Site viewed from A3052 looking west with allocation highlighted yellow and employment land in red.</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>

18.4 Exceptional Circumstances Assessment for Sidm_06a

Major Development in a National Landscape: Assessment of Exceptional Circumstances	
Site Reference	Sidm_06a
<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>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.</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>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 190, which represents around 3% 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.</p>
<p>Are there any cumulative impacts on the national landscape from other proposed allocations?</p>	<p>No. The combined impacts would be minimal.</p>
<p>What is the predicted landscape impact? Can any detrimental impacts be mitigated?</p>	<p>The landscape has a high/medium sensitivity to change. Detrimental impacts can be largely mitigated, but there will be some change to the landscape.</p>
<p>What is the predicted environmental impact? Can any detrimental impacts be mitigated?</p>	<p>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.</p>

<p>Are there any 'exceptional circumstances' that would justify development in the 'public interest'.</p>	<p>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.</p>
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18.5 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

Sidm_31 Landscape Character Type	
5. Nature of development ¹¹²	Housing – the allocation policy (Strategic Policy SD06: Sidmouth and its development allocations) specifies single storey housing.
6. Scale of development ¹¹³	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 site is in LCT 3A: Upper farmed and wooded valley slopes. This is an ancient and settled landscape, containing patchworks of irregular fields and is relatively small in scale with an intimate feel. It has exceptionally high scenic quality, with landscape patterns visible from surrounding higher ground. Key characteristics of this LCT that are seen on the site


¹¹². Criteria 5, 6 and 7 are taken from the footnote to the NPPF


¹¹³ 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>and the surrounding areas are a well treed pastoral landscape with hedgerow trees and winding narrow lanes. Development pressures are identified as a force for change. Landscape guidelines relevant to the site are to improve integration of new development into the wider landscape through characteristic landscape features such as hedges, earth banks and small woodlands and to enhance the Public Rights of Way network in order to connect existing routes and create circular trails. Careful consideration is also necessary as the site is visible in wider views.</p> <p>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.</p>
8. Coastal scenery ¹¹⁴	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. 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 ¹¹⁵	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	Medium - The site has retains a rural character, and affords good views to the east across the valley.

¹¹⁴ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

¹¹⁵ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

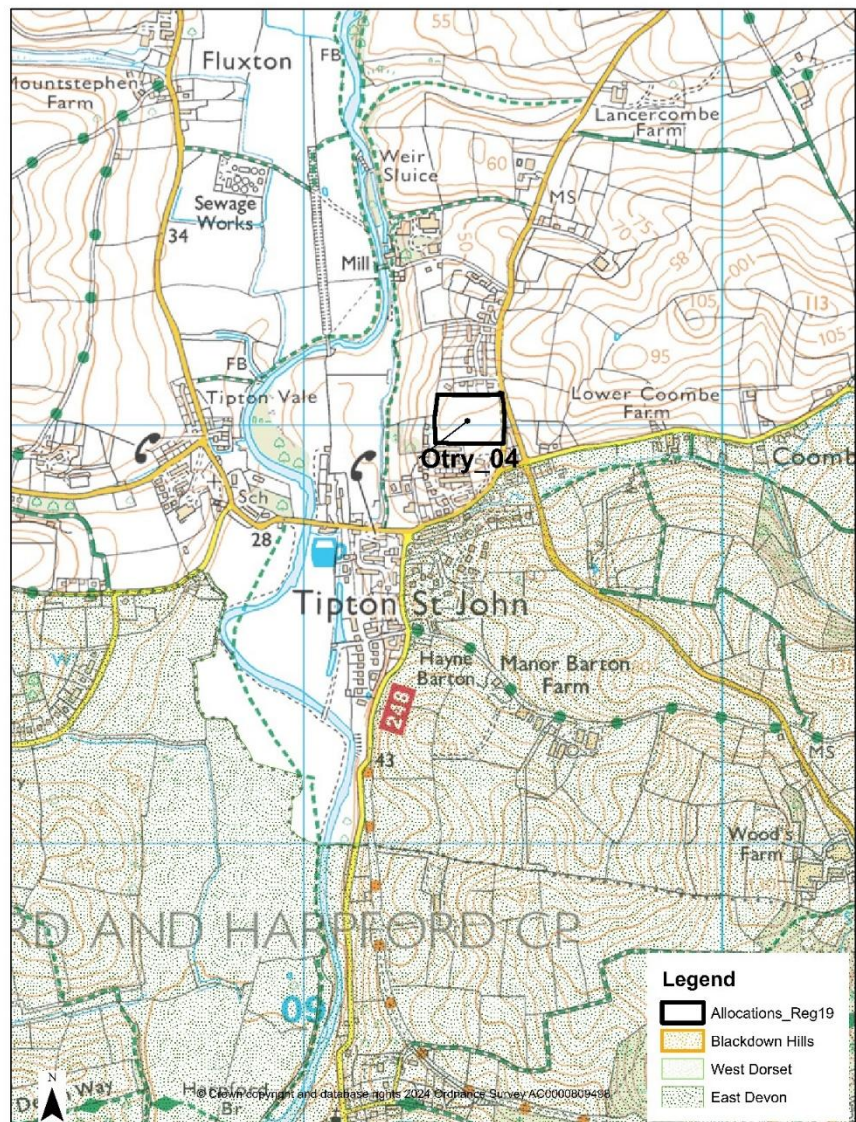
14. Relative wildness	Low - The site has low levels of wildness, being part of a managed landscape at the edge of a town.
15. Relative tranquillity	Medium - There is some sense of tranquillity, but this is reduced by the neighbouring housing.
16. Natural heritage features	Medium - There are strong hedges to the open boundaries.
17. Cultural heritage	Low.
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.
<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>

19. 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 would have very limited impacts on its special qualities, all of which could be mitigated. The allocation is justified in the context of the local plan strategy to allow limited development in Tipton St. John and the retention of a school in the village. The allocation is not considered to constitute major development in the context of the national landscape.

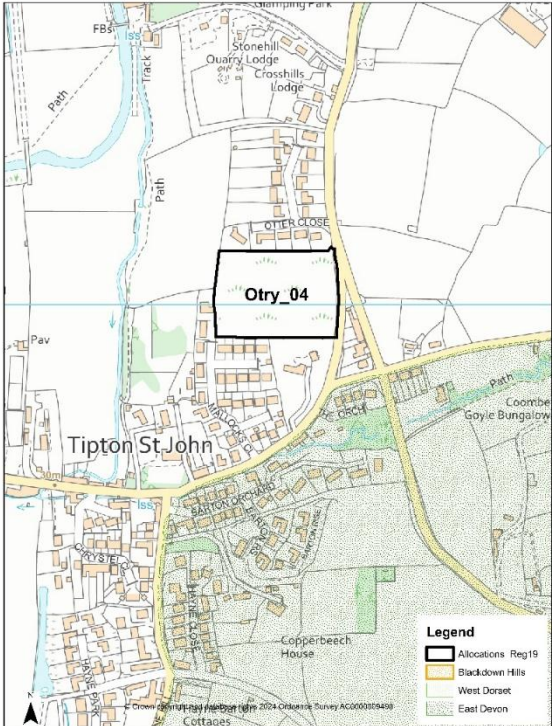

The potential of Otry_04 to be developed in a manner that furthers the purposes of the national landscape to conserve and enhance its natural beauty is set out in the table below, together with how the local plan can help to deliver this.

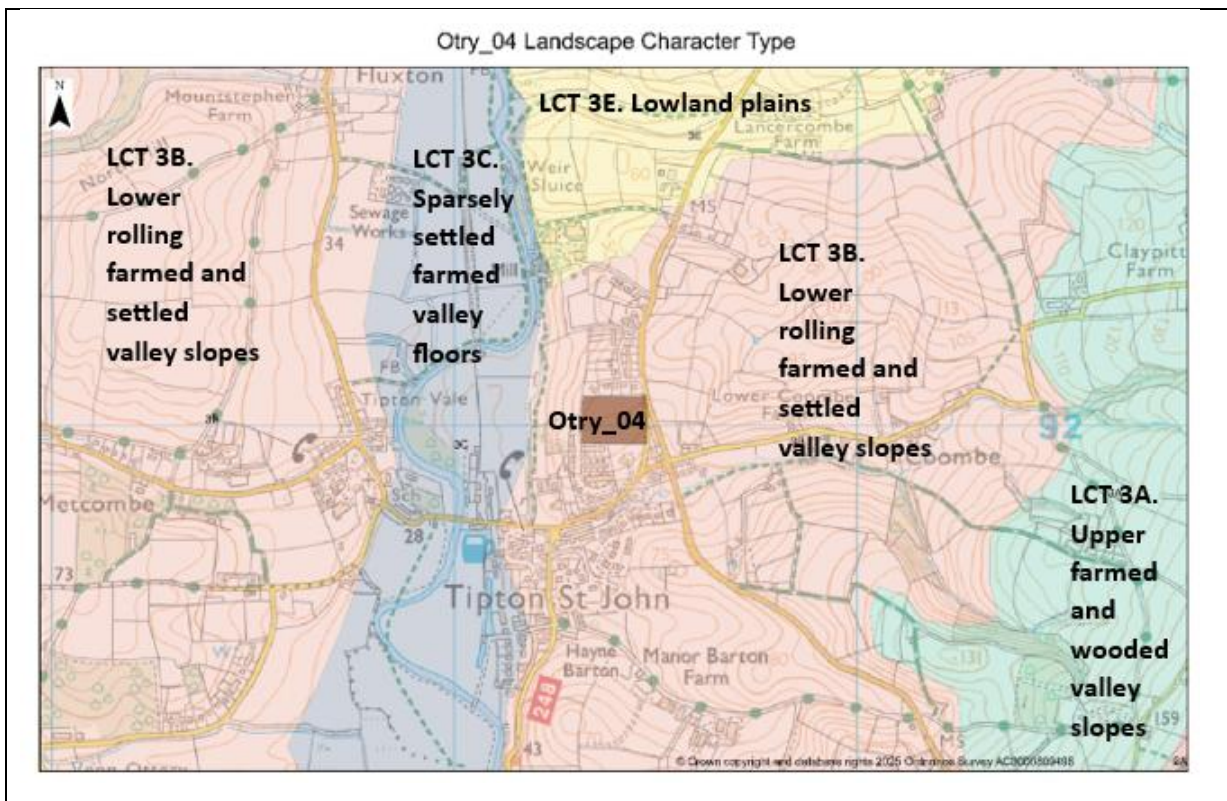


Site	Opportunities to conserve and enhance natural beauty	Actions
Otry_04	<p>Tipton St John comprises two distinct areas of development separated by a floodplain, and several small sporadic clusters of housing around peripheral crossroads at the entrance points to the village. All development in the village, including commercial, community and educational buildings, are of a residential scale and format.</p> <p>The site consists of a fairly level agricultural field, well screened on all sides by existing development or established hedges and mature trees. The site lies around 70m away from the National Landscape, from which it is glimpsed in long range views, against a dispersed backdrop of low level development. The allocation site will only be brought forward if a new (replacement) primary school is delivered as the majority use of the site. This use has the potential to be more visually intrusive, and create more noise and traffic, than a purely residential use of the site (and much more than the current agricultural use). The impact on tranquillity and appearance is balanced against the social and cultural benefits of the primary school remaining in the village and the site being outside the NL, and reasonably well screened.</p> <p>There is also a limited benefit to the NL from removing the existing primary school, which lies some 180m outside it. This will provide a more open view northwards from the NL, along the flat floodplain of the river Otter.</p> <p>Policy SD27 allocates the site for a replacement primary school and up to 5 self-build houses but does not identify any particular design or layout requirements.</p>	<p>Amend policy wording to state that the site is seen in the context of the East Devon National Landscape where careful design is needed to conserve and enhance the natural beauty of the site and its wider landscape setting. This is likely to require that new development is designed to have a fragmented floor plan with relatively narrow gables and limited eaves and ridge heights and no floodlighting of outdoor spaces.</p> <p>Careful consideration should be given to the layout of play areas and car parking to avoid large expanses of hard surfacing. Landscaping within and bounding the site should mitigate the loss of the hedgerow removed to achieve an access to the site and soften the appearance of any security fencing.</p>

Site	Opportunities to conserve and enhance natural beauty	Actions
	There is an opportunity to set out design requirements for the site to ensure that development is assimilated into the landscape around it. Requiring a fragmented floorplan, rather than large scale blocks, and narrow gables and two storey height will ensure that development retains a residential, rather than utilitarian or industrial, character, in keeping with the built form of the village.	

19.1 Major Development Assessment for Otry_04

Form 1: Assessment of Major Development in the East Devon National Landscape	
Criteria	Assessment
1. Protected Landscape	East Devon
2. Reference	Otry_04
3. Map	4. Aerial map
	



5. Nature of development ¹¹⁶	Housing –predominantly two storey (8.5m to ridge). Primary school.
6. Scale of development ¹¹⁷	5 dwellings and a primary school. 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%.
7. Setting	The site forms part of LCT 3B: Lower rolling farmed and settled slopes. Key characteristics of this landscape type relevant to the site and its context are that it is a well settled landscape with winding, sunken lanes with many hedgerow trees. It is a relatively sheltered and enclosed


¹¹⁶. Criteria 5, 6 and 7 are taken from the footnote to the NPPF

¹¹⁷ 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>landscape with a well settled character. Forces for change in this LCT include where settlement expansion does not fit with the traditional settlement pattern and a landscape aim is that, where settlements expand, this is done in a way which enhances their character and setting. Landscape guidelines include ensuring appropriate measures to soften the settlement edge, and to integrate development into the landscape, are incorporated into any settlement expansion plans.</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>
8. Coastal scenery ¹¹⁸	No impacts.
9. Heathland commons	No impacts
10. Elevated land	No impacts.
11. Agricultural valley bottoms	No impacts.
12. Landscape quality ¹¹⁹	The site has a rural character and is self-contained and screened by existing development.
13. Scenic quality	Medium - The site is enclosed by a combination of hedgerows with trees and modern housing and set off a reasonably quiet lane. Views into the site are very limited and as such its contribution to scenic quality within the wider landscape is negligible.
14. Relative wildness	Low - The site has low levels of wildness, being part of a managed landscape within the village.
15. Relative tranquillity	Medium - The adjoining housing and traffic on the nearby road restrict levels of tranquillity.

¹¹⁸ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

¹¹⁹ 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	Medium - There are mature trees to the site boundaries and some within the site.
17. Cultural heritage	Low.
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.	
21. Would allocation constitute major on one criterion?	No.
22. Would allocation constitute major with any combination of criteria?	No.
23. Major development?	No.

20. Appendix A Extracts from the 2025 - 2030 East Devon NL Management Plan ¹²⁰ and Planning Guidance¹²¹

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 177 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 60 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 176 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. The scale and extent of development within all these designated areas should be limited

HOW TO APPLY THE TESTS AND ASSESSMENTS UNDER NPPF PARAGRAPH 177

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 177 (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:

¹²⁰ [freecompress-EDNL Management Plan 2025-2030 FINAL Version_Compacted.pdf](#)

¹²¹ [PLANNING-Guidelines-Revised-08_21_2MB.pdf](#)

- 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 177 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 177 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 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 [freecompress-EDNL Management Plan 2025-2030 FINAL Version_Companded.pdf](#)

The East Devon National Landscape is celebrated for its diverse and striking coastal scenery.

From sheer red sandstone cliffs and wooded combes to stark white chalk outcrops and wild, untamed coastal stretches, the area offers a breathtaking mix of landscapes.

The beauty of East Devon doesn't stop at the coast. Inland, heathland commons form open, remote plateaux with far-reaching views, offering vital spaces for biodiversity and recreation.

Surrounding these plateaux are lowland valleys, characterised by a patchwork of farmland, hedgerows, and woodland copses.

Elevated ridges extend from the Blackdown Hills in the north, their height and linear features highlighted by beech tree avenues. Woodland clads the steep-sided goyles, reaching into the agricultural valleys below.

This contrasts with the broad, flat, floodplains of the rivers Axe and Otter, with tributaries weaving through the farmland before draining into these expansive plains.

Shaped by nature and people

For thousands of years, human activity has shaped this land, creating a landscape of exceptional beauty that underpins its agricultural and tourism-based economy.

Recreational, cultural and spiritual qualities abound, with open access land, nature reserves and a varied network of paths provide extensive opportunities for recreation, healthy exercise, uninterrupted views or an escape to tranquillity and relative isolation.

Our landscape has inspired generations of artistic endeavours, from descriptive writing, poetry, art and music.

21. Appendix B Extracts from 2025 - 2030 Blackdown Hills Management Plan¹²² and Appendices¹²³

Part B: Major Development

Note that all paragraph and footnote references relate to the December 2024 version of the National Planning Policy Framework (NPPF)

Footnote 67 of the NPPF clarifies that: 'For the purposes of paragraph 190 [relating to protected landscapes], 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 National Landscape. 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 National Landscape 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 area. As outlined elsewhere, 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 National Landscape those aspects of natural beauty which make the area distinctive and which are particularly valuable – the 'special qualities' - are described in detail elsewhere in the appendices.

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 National Landscape's 'special qualities'. As well as potential impacts within the Blackdown Hills, consideration should also be given to impacts on these criteria within the setting of the

¹²² [bhaonb_management_plan_2019-24.pdf](#) (blackdownhillsaonb.org.uk)

¹²³ [Blackdown Hills National Landscape Management Plan 2025-2030 Pre-Consultation draft version for local authorities](#)

National Landscape, particularly in the context of visual impact (i.e. views into and out) and impacts on tranquillity.

As outlined in paragraph 190 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 National Landscape 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 Blackdown Hills. 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.

- b. 'the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way';

The National Landscape 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 National Landscape, and clearly identify and justify 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. An important principle to address is that even if there are deemed to be exceptional circumstances generally, such as the need for housing in a particular local authority area, this does not necessarily equate to exceptional circumstances for a particular development at a specific location because there may be alternative sites that could result in less harm to the Blackdown Hills National Landscape. 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 National Landscape 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 National Landscape 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 National Landscape taken 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 purpose to conserve and enhance the National Landscape,
- be compatible with the objectives and policies of the 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

Natural Beauty component: 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 farmsteads and small scattered villages well related to the landscape

Natural Beauty component: 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 hedgebanks and hedgerow trees
- Pattern of regular, larger-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 10
- Wellington Monument is a key landscape feature identifying the Blackdown Hills over a very wide area in all directions

Natural Beauty component: 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

Natural Beauty component: Relative tranquillity

- Areas of high tranquillity spared many of the intrusions of modern life, and places that offer a sense of detachment from surrounding towns and infrastructure
- 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 Beauty component: Natural heritage features

- One of the finest, most extensive plateaus in Britain; a distinctive landform that contrasts with the surrounding lowlands to the east, north and west
- The underlying Upper Greensand geology is unique in Britain
- The presence of straight, uninterrupted ridges are evident as a visual backdrop over a wide area
- Distinctive spring-line mires located at uniform height around the upper slopes of the valleys
- The varied landscape supports a rich assemblage of wildlife including many species of bats, butterflies and moths 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, beavers, lamprey and the vulnerable whiteclawed crayfish

Natural Beauty component: Cultural heritage

- The number and extent of well-preserved 17th Century and earlier buildings, and of complete traditional farmsteads in the local vernacular style – chert, cob, and thatch – are an important element of the landscape
- Ancient hillforts are prominent features on the ends of the plateau ridges
- Mining remains from the once internationally significant whetstone industry and extensive evidence of ironworking

- Three World War Two airfields and remains of 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

22. 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 ¹²⁴	Insert allocation description, such as housing/employment.
6. Scale of development ¹²⁵	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 ¹²⁶	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 ¹²⁷	Insert key findings from the relevant site selection report.

¹²⁴ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

¹²⁵ 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

¹²⁶ Criteria 8, 9, 10 and 11 are taken from the special qualities outlined in the 2025 – 2030 EDNL management [plan](#)

¹²⁷ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

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.
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.

23. 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 ¹²⁸	Insert allocation description, such as housing/employment.
6. Scale of development ¹²⁹	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 ¹³⁰	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 ¹³¹	Insert key findings from the relevant site selection report.

¹²⁸ Criteria 5, 6 and 7 are taken from the footnote to the NPPF

¹²⁹ 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

¹³⁰ Criteria 8, 9, 10 and 11 are taken from paragraph 3.4 of [management plan](#) 'The Special Landscape Character'

¹³¹ Criteria 12, 13, 14, 15, 16 and 17 are taken from Natural England [guidance](#) on meeting beauty criteria for national landscape designation

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.
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? ¹³²	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 ¹³³ ?	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	Yes or No. If yes specify the criterion.

¹³² See paragraph 3.7 [bhaonb_management_plan_2019-24.pdf](https://blackdownhillsaonb.org.uk/bhaonb_management_plan_2019-24.pdf) (blackdownhillsaonb.org.uk)

¹³³ Blackdown Hills [Management Plan](#) and extract of page 19 in Appendix 2

any combination of criteria?	
23. Major development?	Yes or No. Summarise reason for decision.

24. 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.

25. Appendix F Blackdown Hills National Landscape Partnership Representation

Representation

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’

Response

Other strategic alternatives were considered, including more allocations in the West End, as set out in the Sustainability Appraisal¹³⁴. These were:

Option A. Continue with pattern of housing distribution in East Devon Local Plan 2013-31;

Option B. Higher concentration of housing in the West End of East Devon, less in rest of district;

Option C. No additional housing in the West End of East Devon, more at Principal and Main Centres, less at Local Centres and Service Villages:

Option D. No additional housing in the West End of East Devon, more at Local Centres and Service Villages; and

Option E. Most development in West End, high proportion at Principal and Main Centres, low proportion at Local Centres and Service Villages.

The landscape impacts of the 5 options are considered on page 143 of the Sustainability Appraisal. It is noted that Option A, E, and particularly Option B, will minimise the amount of development in East

¹³⁴ [csd-003-sustainability-appraisal.pdf](#)

Devon and Blackdown Hills AONBs, and the undeveloped coast, so a minor negative uncertain effect is likely. Option C means less development in the undesignated West End of East Devon, away from the sea, but a high proportion of housing at Principle and Main Centres – as all of these settlements are in close proximity to an AONB and/or undeveloped coast (with the exception of Ottery St Mary), a significant negative effect is likely. Option D is likely to adversely affect the rural landscape and, with most Local Centres and Service Villages located either within or in close proximity to an AONB, a significant negative effect is likely.

Page 151 of the Sustainability Appraisal sets out why the preferred alternative was Option E - it offers the best balance of accessing jobs, services and facilities at the West End of East Devon and the Principal and Main Centres in an environmentally acceptable way, whilst also allowing for smaller-scale growth to meet needs in more rural areas.

Options C and D were rejected partly due to significant adverse landscape impact from development affecting AONBs, Option B was rejected as it would limit the ability of existing settlements in East Devon to meet their own housing need, would adversely affect town centres, and would likely result in a higher loss of greenfield land.

This demonstrates that alternative development strategies were considered together with the impacts of the options on the national landscapes and that two options were rejected partly on these grounds. The local plan strategy focusses new housing and employment away from the national landscapes and particularly away from the most rural parts of the national landscapes.

Outside of the west end, Exmouth is the focus for most significant development. This reflects the conclusion of the Role and Functions of Settlement study that “Exmouth has a significantly higher population, number of jobs, and level of community services and facilities that distinguish it as the ‘principal centre’ in East Devon”¹³⁵. The site allocations include one site on the edge of Exmouth that is within the East Devon National Landscape, for which there are considered to be opportunities to further the purposes of the national landscape (Exmo_17).

The local plan strategy directs ‘significant’ development to five main settlements, of which allocations in national landscapes are proposed in Sidmouth and Honiton.

The East Devon and Blackdown Hills national landscapes wrap around the north, east and south of Honiton. Most allocations lie outside of, but adjacent to the national landscapes. The first Regulation 19 plan included two areas to the south of Honiton where allocations extended into the East Devon National Landscape (Honi_07/12/13 and part of Gitti_05). The site at Honi_12 is not allocated in this plan. That part of Gitti_05 in the national landscape is not proposed for development, although it is included within the allocation and will provide open space and

¹³⁵ Paragraph 5.5 of [gev-001-role-and-function-of-settlements_report_v3-final-draft-for-spc.pdf](#)

biodiversity net gain to support the allocation. Honiton's location along the valley of the River Otter means that some of the development outside of the national landscape will be seen from higher ground within the national landscapes.

Sidmouth is encircled by the East Devon National Landscape and the sea, so development options for the town outside of the national landscape are very restricted. Three allocations are proposed for Sidmouth, all of which are in the national landscape.

There are opportunities to further the purposes of the national landscape within these sites through appropriate siting, design and use of locally distinctive building forms and materials, retention of existing landscape fabric with appropriate buffers and reinforcement with additional native planting appropriate to the site conditions. Some sites particularly those owned by major landowners offer opportunity for off-site enhancement measures such as reinstatement of historic hedges and the need for the local plan to provide for the future growth of these towns in accordance with the development strategy has been weighed against potential impacts on the national landscape.

Representation

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.

Response

An assessment process that included landscape assessment was applied to all sites that passed initial site sifting in accordance with the site selection methodology¹³⁶, which includes a landscape sensitivity assessment¹³⁷. The landscape value ratings included in these assessments ensure that nationally or internationally designated landscapes, like the national landscapes, have the highest value when assessing the landscape sensitivity.

Summaries of the work undertaken were reported to a series of Strategic Planning Committee meetings that agreed the regulation 18 plan and landscape was referred to for individual sites on the consultation portal where relevant¹³⁸. During the progress of the plan to Regulation 19 further,

¹³⁶ [sal-001-site-selection-methodology_v2-2020-2042.pdf](#)

¹³⁷ [sal-002-landscape-sensitivity-assessment-methodology.pdf](#)

¹³⁸ [Have Your Say Today - East Devon Local Plan - Commonplace](#)

more detailed site assessment work was undertaken for the proposed allocations. The value of the landscape and its sensitivity to change have been considered throughout the site assessment work.

The first topic paper on major development in the national landscapes was finalised in February 2025 after the site selection process that informed the first Regulation 19 plan. However, the draft assessment method and landscape assessments for relevant officer recommended sites was discussed with national landscape officers in February 2024 prior to the report to the Strategic Planning Committee in June 2024¹³⁹, when the methodology was agreed.

The approach of assessing landscape impact as part of the wider site assessment work and in advance of issues of whether development constitutes ‘major’ development in the context of a national landscape is considered to be reasonable and proportionate. Many of the potential site allocations in the national landscapes were not allocated in the Regulation 19 plan and assessing whether such sites should be considered to be ‘major’ development in this context would not make good use of resources.

Representation

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

¹³⁹ [Agenda for Strategic Planning Committee on Tuesday, 4th June, 2024, 10.00 am - East Devon](#)

- 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.

Response

National guidance on how to determine this duty has been used to refine the assessments undertaken for this revised topic paper and a specific assessment of each site has now been included. The landscape assessment that informed site selection¹⁴⁰ includes consideration of the likely issues and impacts listed in the representation, although inevitably the limited site design information available at plan production stage prevents a detailed assessment of such effects. Furthermore, the national guidance makes it clear that local planning authorities need to balance the duty to further the purposes of the national landscape with their statutory duties, including planning appropriately for growth through the local plan.

Representation

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.

Response

¹⁴⁰ Paragraph 4.3 of [sal-002-landscape-sensitivity-assessment-methodology.pdf](#)

The landscape assessment includes the landscape character of the site in context with the host landscape and further assessment work in relation to landscape character and setting has been included in this topic paper.

Representation

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.

Response

The standard table sets out a 'generic' example of ridge heights for assessment purposes and acts as a prompt for the assessor to consider the landscape impacts of this and whether it would be reasonable to limit the height of development. For example, the policy for an allocation in the East Devon National Landscape (Sidm_31) states that "The site will require very careful planning and use of materials to take full account of both the immediate context and views from the wider landscape, particularly when viewed from higher land to the east, and only single storey dwellings will be appropriate". However, the assessment form for sites affecting the Blackdown Hills national landscape has been amended so that two storey dwellings are the maximum indication given.

The broader point about appreciation of the special qualities of the national landscape is included in the assessment process, where Section A of Part 1 of the form requires the assessor to set out the special qualities of any national landscape, with reference to the relevant management plan¹⁴¹. However, in response to this representation, this topic paper has been reviewed to consider whether the natural beauty and special qualities of the national landscape have been properly considered. In some cases, additional text has been added to the local plan to require development to be locally distinctive.

Representation

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.

¹⁴¹ Page 14 of [sal-002-landscape-sensitivity-assessment-methodology.pdf](#)

Response

In order to ensure that sufficient sites are allocated to meet the housing requirements, there was an iterative process to site allocation. The final stages of this included the Strategic Planning Committee considering the site assessment work undertaken by officers and finalising sites for allocation in the first Regulation 19 plan in accordance with the principles set out in Paragraph 5 of the report to the 29th October 2024 Strategic Planning Committee¹⁴².

Representation

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?

Response

Further assessment work on heritage has been undertaken on several sites, including those listed in the representation. Honi_12 is no longer allocated.

Suggested Modifications

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.

Response

This topic paper sets out the further work that has been undertaken on the sites that are in or adjacent to the national landscapes and further references have been added to the plan text to

¹⁴² [3. Local Plan allocation site selections.pdf](#)

reference the relevant policies. Two sites are no longer allocated and the policy wording for all the other sites has been amended to reflect national landscape considerations.