

## Introduction

Clinton Devon Estates are the owners of a very large area of land within East Devon. As part of its interests, the Estate undertakes residential and commercial development and manages substantial farming and forestry operations.

The Estate has provided representations to the Council as part of previous consultations on the draft local plan and via the related call for sites process. They therefore have considerable interest in the policies and objectives as now set out in the current draft of the plan. On behalf of Clinton Devon Estates, we have therefore reviewed the plan and therefore make the following comments in connection with the proposal to allocate the land to the east of Liverton Business Park under draft Strategic Policy SD01.

### **Strategic Policy SD01: Exmouth and Site Exmo\_18 (Land to the East of Liverton Business Park)**

This policy states:

*“This land, to the east of Liverton Business Park is allocated for employment uses and will form an extension to the existing business park and extends to around 2.7 hectares in size.*

*Development should take account of the relationship between the site and the East Devon National Landscape, with particular care taken to ensure that any development in the southern third of the site is sensitively designed and kept below the level of the ridgeline to the south. To avoid adverse landscape and visual impacts on the National Landscape and its setting, primary vehicular access should be taken from the Liverton Business Park. Any secondary access from Salterton Road should be carefully designed and screened to minimise any impacts on the setting of the National Landscape. Existing hedges to the southern and eastern site boundaries should be reinforced and appropriately managed and additional trees planted.” [Our underlining]*

We welcome the previous Strategic Planning Committee’s (SPC) support for the addition of a secondary access to the site from Salterton Road and its decision to amend the draft policy wording to allow for this. However, we have serious concerns over the new requirement to keep development at the southern third of the site *“below the level of the ridgeline to the south.”* The wording underlined, which was not discussed during the SPC meeting held on 25<sup>th</sup> November 2025, introduces a new unnecessary, unjustified, and ambiguous planning restriction. There is no clearly defined or obvious ridgeline to the south when standing at the Salterton Road/B3178 boundary of Exmo\_18. The ridgeline could be set by the hedgerow on the southern side of Salterton Road, but its limited height would effectively preclude any development at the southern end of Exmo\_18.

The main issue addressed at that SPC meeting was whether access, be it primary or secondary, should be permitted to Exmo\_18 from Salterton Road. This reflected officers' previous concerns over the potential impact on the National Landscape and visual approach to the town centre. The commentary at the meeting focused on ensuring that the openness and visual experience when entering Exmouth from the east is taken into consideration, rather than seeking to impose restrictions on the height of any development at Exmo\_18. It was acknowledged that Exmo\_17, on the southern side of Salterton Road, sits across from Exmo\_18, and that future development of Exmo\_17 will alter the view at the entrance to the town.

The SPC voted to approve the inclusion of secondary access from Salterton Road adopting wording, set out in the meeting, which related to the design of that access, to minimise the impact on the setting of the National Landscape. At no point during either of the two recent SPC meetings was it proposed or agreed, that the site at Exmo\_18 should be subdivided into rigid zones such as the "southern third", nor that any zone should be subject to any special constraints or specific height restrictions. On the contrary, explicit support was shown toward development across the site, including the southern part. There was clear confirmation that the site is a logical extension of an existing, successful business park and important to Exmouth's future economic function. Restricting the height of the development based on an unspecified topographical feature pre-empts site specific master planning and design work. The SPC's concerns regarding any development fronting Salterton Road/B3178 will be appropriately addressed during the planning process. Ultimately, the acceptability of any development within the southern part of the land on the nearby National Landscape can be assessed as part of any future planning application and, if necessary, changes made to the proposal at that point.

Given the concerns outlined above, the policy in respect of Exmo\_18 is currently unsound in that it includes limitations which are likely to undermine the deliverability of commercial use on the land. As worded, the policy does not meet the NPPF requirements (at paragraph 36) which requires that local plan policies be justified and effective. We therefore propose an amendment to the policy wording to overcome these concerns.

**Suggested Amendment to Policy Wording for Exmo\_18**

In summary, the inclusion of the drafting shown underlined above was not explicitly or implicitly endorsed by the SPC and does not define a measurable ridgeline capable of supporting a firm policy restriction. Therefore, we request that the text is revised as follows, with the struck through text to be removed:

*“Development should take account of the relationship between the site and the East Devon National Landscape, with particular care taken to ensure that any development in the southern third of the site is sensitively designed ~~and kept below the level of the ridgeline to the south~~. To avoid adverse landscape and visual impacts on the National Landscape and its setting, primary vehicular access should be taken from the Liverton Business Park. Any secondary access from Salterton Road should be carefully designed and screened to minimise any impacts on the setting of the National Landscape. Existing hedges to the southern and eastern site boundaries should be reinforced and appropriately managed and additional trees planted.”*