
East Devon Local Plan – Consideration of potential plan changes to allocations

Report summary:

This report, following on from considerations at Strategic Planning Committee on 8 July 2025, considers and advises on recommended changes to development site allocations in the local plan in light of feedback received from the first Regulation 19 consultation. Specifically, this report:

- a) Reflects on past work and succinctly sets the scene for future work.
- b) Advises on what is considered to be the limited legitimate scope for making changes to the plan in respect of the second stage of Regulation 19 consultation.
- c) Highlights the broad approach to more detailed site work around assessment that has been undertaken specifically in respect of heritage and landscape matters.
- d) Sets out limited officer recommendations on changes to the plan in respect of sites that were allocated in the plan at the first stage of Regulation 19 consultation. The sites, identified by settlement/location listed below, are addressed in detail in this report. These are sites that committee previously wished to see reappraised or have been identified by officers as appropriate for review on account of representations received – notably from statutory bodies and including in respect of heritage, landscape or mineral considerations. Officer recommendations on plan changes are detailed below:
 1. **Exmouth** – four housing/mixed use allocations sites are considered in some detail – Exmo_47, Exmo_20, Exmo_17 and Exmo_08 and Exmo_16 combined. None of these are recommended for deletion though refinement of policy is recommended to address concerns highlighted (specifically so for Exmo_20).
 2. **Axminster** – it is recommended that employment site Axmi_01a is deleted from the plan on the basis of potential adverse archaeological impact. In respect of Axmi_02, Axmi_08 and Axmi_09 we will need to come back to a later committee meeting as agents have been asked to undertake archaeological assessments, but conclusions will not be reached in time for the committee meeting.
 3. **Honiton** – Officers recommend that three sites on the southern side of the town - Honi_07, Honi_12 and Honi_13 are deleted from and not shown as allocations in the plan. To address the resulting housing shortfall this will result in it is recommended that two sites on the eastern side of the town, that are already allocations in the plan – GH/ED/39a and GH/ED/39b - have an increase in allocation numbers. In respect of site Honi_18 it is not recommended that any changes are made to the local plan.
 4. **Seaton** – Officer have reviewed site Seat_13a and consultation responses on the basis of potential adverse archaeological concerns, and agree that specialist archaeological assessment is required to justify allocating the site. We will need to come back to a latter committee meeting with any conclusions that may be reached should work be undertaken and conclusions dependent.

5. **Feniton** – Officer have reviewed two sites at Feniton. It is proposed that the housing allocation site Feni_08 is retained in the plan and it is also proposed that the employment allocation site Otry_20 is retained.
6. **Whimble** – It is recommended that both Whim_08a and Whim_11 are retained as allocations in the plan, but with some revisions to policy text.
7. **Land at Darts Farm** – For this employment allocations there are outstanding concerns, including in respect of archaeological considerations. Assessment work is ongoing but at this stage conclusions cannot be reached and therefore will need to come back to a later committee meeting.

- e) We highlight in the report that for some other locations and sites there is also heritage assessment work that is ongoing, and some further wider assessment work, and therefore we cannot draw conclusions at this point in time. For other sites there are some but less significant concerns raised in representations. We would envisage addressing these sites and matters in final policy redrafting, for a later committee meeting.
- f) We would also advise that we have received feedback on a limited number of sites that could impact on overall development levels. Also there are cases where promoters are advocating differing levels of development from those set out in policy, in some cases higher and others lower. We will assimilate all house building numbers into a future committee report with these assessed against quantified housing needs.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Strategic Planning Committee endorse the officer recommended changes to the local plan as set out in this report.

Reason for recommendation:

To help with policy refinement and advance the local plan.

Officer: Ed Freeman – Assistant Director Planning Strategy and Development Manager

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☒ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☒ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☒ Place, Infrastructure and Strategic Planning
- ☐ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Low Impact

Risk: No specific risk impacts are identified.

Links to background information Links are contained in the body of the report.

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
 - ☒ Carbon neutrality and ecological recovery
 - ☒ Resilient economy that supports local business
 - ☒ Financially secure and improving quality of services
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1. Summary of the report to committee on 8 July and note of committee conclusions reached

1.1 Strategic Planning Committee on the 8 July 2025, see: [Agenda for Strategic Planning Committee on Tuesday, 8th July, 2025, 10.00 am - East Devon](#), received a report that, amongst other matters:

- set out information about and summary details of feedback received to the first round of Regulation 19 plan consultation.
- provided a link to a comprehensive summary feedback report, set out on a policy by policy basis, of comments received through consultation – see: democracy.eastdevon.gov.uk/documents/s27857/1a Appendix Reg 19 Stage 1 feedback report.pdf
- highlighted key matters raised, specifically including from statutory consultees that are seen to warrant further attention.
- advised of further evidence gathering and assessment work; and
- set out a proposed timetable to take the plan to the second round of Regulation 19 consultation.

1.2 Following lengthy debate, and after hearing members of the public speak, committee concluded that there is a need for consideration at a future meeting of the following:

- Water Cycle Study
- CCMA's
- Duty to Co-operate
- Wind energy areas
- Sites Lymp_01, Whim_08a, Whim_11, Feni_08, Otry_20, Exmo_17, Exmo_20 and any further sites that officers feel should be brought back

The list of sites was compiled based on the sites that had a higher than average number of objections. In light of this it was subsequently confirmed that Lymp_01 was included in error and so this site is not addressed in this report.

1.3 This report forms part of the initial feedback, specifically relevant to allocations sites in the local plan, and is also complemented by separate reports to this same committee meeting on matters noted above and:

- the duty to co-operate, and
- gypsy and traveller policy.

- 1.4 By way of future scene setting, it is proposed that two key further reports will come to committee in the near future:
- **Late September 2025** - A report on the new community setting out - master planning conclusions, viability assessment and other key matters around delivery. This work may generate some, but it's not to be expected substantive, recommended changes to local plan policy and supporting text. Also, where available and completed, we will report on any further site assessment work, specifically in regards to any ongoing archaeological assessment work.
 - **October 2025** – A full redrafted local plan, with accompanying new Policies Map, that will be recommended for a second stage of plan consultation under Regulation 19 of the plan making regulations.
- 1.5 On the basis of the above, with a resolution sought to agree consultation, we would envisage that plan consultation will start in Autumn 2025 and conclude before Christmas 2025.

2 Scope for making plan changes at the second round of Regulation 19 consultation

- 2.1 The government recently issued guidance [Plan-making - GOV.UK](https://www.gov.uk/guidance/plan-making) in respect of cases where planning authorities undertake two or more stages of Regulation 19 consultation. It states:

How do the implementation aspects of the NPPF apply to plans where more than one round of Regulation 19 consultation has been undertaken?

Some local planning authorities may undertake more than one round of Regulation 19 consultation on a plan. Where this is the case, for the purposes of implementing Annex 1 of the Framework, a plan is normally to be taken as having reached the Regulation 19 stage at the date on which the first round of Regulation 19 consultation commenced.

However, in some limited circumstances, a plan is to be taken as having reached Regulation 19 on the date that a subsequent round of consultation commenced. These limited circumstances could include instances such as when the content of an emerging plan has changed significantly from the one presented at the initial Regulation 19 stage.

Paragraph: 86 Reference ID:61-086-20250616

Revision date: 26 06 2025

- 2.2 This guidance establishes, in Government policy, that more than one stage of consultation can be undertaken. Noting that some making representations on the local plan challenged having two rounds and contested that the plan has/had not legitimately reached the Regulation 19 stage when we consulted earlier this year.
- 2.3 However, we specifically need to note the second paragraph above which highlights that circumstances may arise where the first round of consultation should not be regarded as the valid start of Regulation 19 consultation. In such cases (if the first

round is not determined to be valid) the start of Regulation 19 consultation commences when a second or a subsequent stage of consultation starts. There is a lack of detail or precision around the “circumstances” but an example is given, specifically it is stated **“when the content of an emerging plan has changed significantly from the one presented at the initial Regulation 19 stage”**.

2.4 Although not stated as examples it may be that other circumstances could include:

- if or when there is a substantial time delay between any stages,
- if national policy, guidance or legislation has changed and this materially impacts in a significant way on a plan, or
- if circumstances or issues/matters in a local planning authority area change (perhaps substantially) and this impacts in a substantial way on matters that are or need to be covered in local plan policy.

2.5 The issue of legitimacy of having two stages of consultation is specifically relevant in East Devon as the first stage of consultation was started before the end of March 2025. Under transitional arrangements, from the former 2023 NPPF to the new 2024 NPPF, the Council can provide for 80% of standard method housing need numbers (rather than the full 100%) in the local plan and this is what we do in our local plan. But to do this required that Regulation 19 consultation started before the end of March 2025.

2.6 If the council were not working under transitional arrangements we would need to jump up from meeting 80% of housing needs to the full 100%. This would amount to a very significant increase in the number of new homes that would need to be provided through the local plan and would in effect require work on the local plan to start again (or at least take considerable steps backward). Such an approach would be contrary to the government aspiration for up-to-date local plans to be adopted as quickly as possible.

2.7 Based on our assessment of housing needs, the standard method generates a need for 1,188 new homes per year. Providing for 80% of this generates a figure of 950.4 per year, this amounts to a total of 20,909 over the 22-year life span of the plan. In contrast, if we were to supply the full 1,188, over 22 years, it would amount to planning for 26,136 new homes. This would require finding land to accommodate an additional 5,227 new homes. In reality the arithmetic is slightly more complicated than this but the bottom line is a substantial increase in housing numbers in the plan period..

2.8 The standard method numbers we need to plan for (whether we meet the full 100% or 80%) are determined by Government and they are a minimum.

2.9 We need to be very wary of the potential for challenges around whether we fall foul of rules around having two or more stages of consultation. The guidance is new and therefore will not have been rigorously tested to date. It is suggested that we should work on the assumption that some who advocate higher housing numbers (or have other challenges to the plan) will want to test this matter. They may well do so in and through plan Examination, and an inspector undertaking Examination may wish to draw their own conclusions irrespective of any representations received. Challenges could

also come through the courts and in their deliberations Inspectors at plan examination will be aware of potential for legal challenges and may weigh this in their considerations.

- 2.10 A difficulty we face is that we would not wish to leave ourselves open or vulnerable to challenge. But it is far from clear cut what the degrees of vulnerability are. We would though suggest that of most importance would be the issue around the scale and nature of changes that are made between the first and second Regulation 19 plans. One or more substantial changes could place us in a more vulnerable position, as could a higher number of smaller changes with a big cumulative impact (as could a mixture of big and small changes).
- 2.11 Officer advice is that Committee should be cautious and think carefully about potential plan changes to minimise the potential of placing the Council into a vulnerable position to challenge. In making any changes Committee should also carefully consider whether any changes are justified on the basis of robust objective evidence. Noting these points officers have sought to make limited recommendations on plan changes, in this report. Where changes are recommended, they are not seen to be substantive in scale and as such seek to minimise rather than increase the risk of challenge.
- 2.12 It is highlighted that there are cases where, at Examination, inspectors have concluded that the only way that a plan could be made to be sound would be for substantive changes to be made. But such changes have (in inspectors conclusions) been deemed to amount to making the plan significantly different from the plan that was submitted for examination and as such rules around the Regulation 19 stage of plan making would not be complied with. The result being that such plans fail at examination and could not be adopted.

3 New standard method housing need numbers

- 3.1 Commentary and assessment in this report (prior to this section) relates to standard method housing number outputs that were applicable at the time of production of the first Regulation 19 local plan. However, standard method numbers can change over time, they are a product of calculations that draw data from records that are updated throughout the year.
- 3.2 In May this year new data led to a revision of standard method housing numbers. They fell in East Devon from the level of 1,188 per year, as noted in the first Regulation 19 plan and referenced earlier in this report, to a new figure of 1,156. A fall of 32 per year. Applying an 80% factor to this equals a fall of 25.6 per year and multiplying this out over 22 years equals a plan wide total fall of 563.
- 3.3 We draw this to Committee attention as, in theory at least, there could be scope to plan for less housing in the second Regulation 19 plan. However, we would stress distinct risks in doing so, to include:
- Whilst numbers can go down, as they have, they can also go up - they could do in the future and if they did we may go into plan Examination with a numerical deficit.

- We are already substantially short of meeting the full 100% Standard Method numbers and this is a matter we have been robustly challenged on. However, we justify our position in doing so on the strength of the NPPF advising it is allowable. But to drop numbers further could lead to greater vulnerability to challenges of not adequately planning for appropriate housing provision.
- A full drop of 563, or even going some way towards it, may well be challenged as amounting to a significant change to the plan and as such this might be seen as being grounds to argue that the first stage of Regulation 19 consultation is invalidated.

3.4 Officer recommendation is that we do not seek to amend the housing numbers that the plan seeks to accommodate (i.e. we do not seek to apply the lower standard method number), or at least not in any substantive way. Rather we note this new number in plan text and explain how it helps establish a higher headroom ‘safety-net’ that further shows the robustness of our position (albeit we will need to do future numerical assessment around numbers).

3.5 We would highlight as well, and in respect to housing numbers and the life span of the plan, that we currently have a plan end date of 31 March 2042. The NPPF advises (2023 draft paragraph 22 but also applies to the 2024 NPPF) that strategic policies in a plan should “*look ahead over a minimum 15-year period from adoption*”. Adoption is likely to be in the year of 2027/28 and to run forward 15 full years from here would take us to the year of 2042/43. Whilst having a full 15-year time horizon may not be essential it does help the Council case to have some degree of planned ‘over provision’ to counter possible challenges of not addressing a full 15 year time perspective. The longer time frame for new community development, with development going well into the 21st century, also helps in this respect.

4 Responding to representations on the plan – specifically from statutory consultees

4.1 There were a great many representations on the first draft of the local plan from, amongst others, the public and the development industry that raised legitimate concerns and issues. Where site specific many of these are referenced in this report. However, in this report we particularly major on matters raised by statutory consultees to the plan making process where they relate to technical matters of concern.

4.2 Of greatest significance we note that the report to the strategic planning committee in July 2025 highlighted additional work that was being undertaken in respect of potential heritage impacts and also in respect of allocations in or adjacent to areas designated as National Landscapes. These considerations are especially important as potential for adverse heritage and landscape impacts formed significant aspects of representations on the plan and they are of a nature that relate to legal tests of significance in terms of plan soundness, rather than (just) planning judgement.

Landscape considerations

- 4.3 The Levelling-up and Regeneration Act 2023 (LURA) introduced a duty for planning authorities to 'seek to further' the statutory purposes of protected landscapes (conserving and enhancing their natural beauty). This duty came into effect shortly before the first Reg 19 consultation and so was not addressed in our work at that time. Representations have been received from Natural England and both the Blackdown Hills and the East Devon National Landscape partnerships raising concerns that it is not clear how the plan strategy and site allocations comply with the duty to further the purposes of the national landscapes.
- 4.4 A stepped interpretation of the new duty, much simplified, may be looked upon when making planning decisions as:
- Determine whether the development conflicts with the purpose of conserving and enhancing natural beauty.
 - If it does, consider whether, in local plan terms, making land allocations is still justified and explain why.
 - Explore mitigation or compensatory measures where appropriate.
 - Provide clear, adequate reasoning to demonstrate how the duty has been discharged.
- 4.5 The Major Development in National Landscapes Topic Paper is being updated to address these concerns and will be finalised in readiness for a later committee meeting/as background evidence to support the plan. The work undertaken so far indicates that most of the allocations are justified in terms of the national landscapes, subject to additional or amended policy wording. However, as noted in later site-specific sections of this report, there are specific concerns in respect of a small number of allocated sites in the plan that we would wish to draw to committee attention. In some cases, we consider these concerns to be of such a scale to lead to a recommendation of deletion of the sites from the plan.

Heritage considerations

- 4.6 In terms of heritage impacts, Historic England and Devon County Council have raised concerns about the potential of several allocation sites to result in significant harm to heritage assets, including Grade 1 and Grade 2* listed buildings and Scheduled Ancient Monuments. Although the site allocation work previously undertaken highlighted the potential impacts, and various policies required issues to be addressed through the development management process, Historic England and Devon County Council are clear that, in their view that in some cases, work must be carried out before allocation. This is particularly important in respect of subterranean archaeology where the extent of the monument, and potential impact, require technical on-site assessment.
- 4.6 Additional heritage impact assessments have been undertaken for the following sites:
- Exmo_08 and 16 (Littleham Fields) - 45 houses
 - Exmo_17 (South of Littleham) - 410 houses, 1.6ha emp.
 - Exmo_20 (Land at St John's) - 700 houses, 2ha emp.
 - Exmo_47 (West of Hulham Road) - 15 houses

- Honi_07 and 12 (adj St Michael's Church) - 101 houses (noting deletion is proposed as a result)
- Honi_13 (Middle Hill, Church Hill) - 10 houses (noting deletion is proposed as a result)
- Wood_28 (North and East of Exton Farm) - 39 houses

and are appended to this report or addressed in site specific commentary. It is concluded that it is possible for the heritage concerns to be satisfactorily addressed for the majority of sites, subject to additional policy wording and therefore they should continue to be allocated. However, see detailed comments in later section of this report about more significant concerns that have been highlighted.

- 4.7 Archaeological investigations are underway for two housing site allocations, the results of which will need to come back to a later strategic planning committee meeting (Axmi_02/08/09 and Seat_13a).
- 4.8 Archaeological investigation is being undertaken on site Clge_25a, the southern section of the field adjoining Dart's Farm, which is proposed for employment allocation. The results will need to be considered at a later strategic planning committee meeting.
- 4.9 It has not been possible for the landowner of Axmi_01a, an employment allocation site, to undertake the additional archaeological investigation required and this site is no longer recommended for employment allocation. The settlement boundary will be amended to reflect this.

Mineral resource protection

- 4.10 We would highlight that Devon County Council made comment specifically about mineral safeguarding matters at Site Exmo_20. This is addressed in specific commentary about this site.

5 Approach to reassessment of housing and employment allocation sites

- 5.1 Strategic Planning Committee specifically requested a review of a number of allocation sites in the local plan, these are Exmo_20, Exmo_17, Whim_08a, Whim_11, Feni_08 and Otry_20. Commentary on these sites and a number of others identified by officers, are set out in following sections in this report.
- 5.2 On a general note, however, specifically around avoiding substantive plan changes and bearing in mind the need for decisions to be informed and underpinned by sound evidence, officer recommendations are for comparatively limited changes to land allocations in the plan. The onus, it is suggested, should be placed on changes to policy wording rather than changes to allocation boundaries or to the deletion of sites. As a general observation we would identify legitimacy concerns, and therefore vulnerability to challenge, if housing allocation numbers in any settlement, and specifically those settlements at or towards the upper end of the settlement hierarchy, were to change significantly (especially if they went down significantly).

- 5.3 Further, it is important to stress that if housing allocation numbers go down through the deletion of any allocations (or otherwise reductions in housing numbers on allocated sites) then shortfalls would need to be made up. Officers would suggest that should numbers go down in any settlement or location, through policy changes, then the resulting shortfall should be made up through allocation of additional sites, or increase in provision on existing sites, or a mixture of the two, in that settlement/location. Adopting this approach lessens the likelihood of successful challenges around making significant changes to the plan, specifically in respect of the strategic distribution of development.
- 5.4 Of greatest significance we specifically draw to Committee's attention the town of Exmouth and the large allocation sites of Exmo_20 and Exmo_17. Exmouth is the largest town by some way in East Devon and it falls second (in a category of its own and only after the West End) in the settlement hierarchy. Strategic Policy S1 of the local plan advises that the plan is *"Promoting the most significant development levels, other than at the West End where the highest levels of growth are proposed, at the Principal Centre of Exmouth."*
- 5.5 As drafted the local plan allocates land, over a number of sites, for 1,454 new homes in Exmouth. Outside of the West End the town sees the highest levels, in numerical terms, of new housing growth. This is strategically appropriate given its position in the spatial hierarchy. But even this level of housing provision has some degree of fragility noting that in comparison to its existing size (specifically its existing number of dwellings), the percentage increase in the size of the town through plan allocations is not as proportionately great as for some other, lower tier, settlements (specifically including other towns in the district). Some objecting to the plan have raised this issue and we could be challenged by an inspector on this point at Examination.
- 5.6 Exmo_20 accounts for 700 of the allocated dwellings in Exmouth, 48% of the total and Exmo_17 for 410, 28% of the total. If either of these sites were deleted in their entirety from the plan we would be concerned that this would amount to a significant change that would raise challenges around whether the next stage of consultation really is a second stage at Regulation 19, or whether we are effectively starting afresh. Being so much larger this is especially the case for Exmo_20. Furthermore, given the comparative lack of good alternative options for allocation of sites in/at Exmouth, if substantive reductions are made it is challenging to see how any shortfall in housing numbers could be addressed at the town.
- 5.7 We would highlight that there is some limited potential flexibility in allocation numbers at some sites. This is noted further in in this report in respect of two sites in Honiton. We would also highlight, as a specific example, that site Exmo_04 - Land at Marley Drive in Exmouth is allocated in the local plan for 50 dwellings, this reflects site sensitivities in biodiversity terms and a low-density development being envisaged. Site Exmo_04 is, however, subject to a planning application - 25/0078/MOUT - that is currently under consideration for up to 130 dwellings. In this report we do not pass comment on the potential acceptability of the scheme, but if the application were to be granted then it would be an 'addition' of 80 dwellings to the supply side of the equation.

- 5.8 For a future committee meeting, once we have all relevant elements of site assessment work completed, we will bring a report to committee (or set out in proposed amended plan wording) a full review of housing numbers on site allocations.
- 5.9 It is highlighted that in respect of employment allocations the matter of deletion of sites from the plan is somewhat less sensitive. We make good provision for employment land allocation in the local plan, albeit with a large part of this being at or close to the West End. Based on current levels of allocations, and the fact that Government policy is not prescriptive about meeting set identified needs, there is greater scope for some deletion of employment allocations (especially if sites are of a smaller size) than there is for housing with somewhat less need to be concerned about issues surrounding shortfalls. Though if substantive changes to employment provision were made it could lead to vulnerability over challenges.
- 5.10 In later sections of this report we address key settlements in turn where site issues have been identified, and we comment on each identified site in turn. We show a map identifying each identified site plus others that members may wish to choose to allocate for development (in part or full) should they wish to make any plan changes or site deletions. For some site allocations officers have produced suggested revised plan policy wording that respond to concerns raised. In other cases (where less significant concerns arise) matters of relevance are raised but at this stage new policy wording is not proposed. Rather, the intent, is to bring revisions back to committee later in the summer.

6 Ongoing and future refinement of housing number assessment

- 6.1 In this section we highlight a small number of potential recommended changes to housing site allocations and other matters that may impact on housing provision in the local plan. At this stage of work we cannot provide definitive conclusions on overall final numbers, specifically noting:
- a) At this meeting committee are being asked to consider sites and conclusion s reached by committee may impact on allocation numbers.
 - b) We are in active engagement with site promoters and this work may lead to possible future recommendations on changes to numbers at some sites – including where capacity levels may be appropriate for adjustment (potentially up or down).
 - c) We do not yet have all assessment outputs, especially in respect of archaeological works, to draw final conclusions on allocation of some sites.
 - d) We will need to take into account actual housing needs and conclusion that committee may reach in respect of any changes arising, or chosen to be made, from or related to Standard Method output changes.
 - e) We ideally would want to update and rebase housing assessment work from a forward looking position of 1 April 2024, as featured in the first Regulation 19 plan , to a new forward looking position starting from 1 April 2025, i.e. moving

assessment on a year. There is still some work to be undertaken to achieve this and if and when completed it could have some impacts on overall numbers.

- 6.2 For the locations and sites specifically featured in this report we would, however, advise of significant enough confidence in numbers and development distribution matters to draw up recommendations. But we would highlight that final numbers and sites, to be recommended by officers, and taking into account decisions made at this Committee meeting, will need to come back to a subsequent committee meeting to be incorporated into and agreed on for the final draft of the local plan.

7 Sites at Exmouth

- 7.1 Sites at Exmouth that have been identified for further assessment are referenced below. After the listed sites there is a map showing their locations. We identify alternative sites at Exmouth that could be allocated for development should committee wish to make amendments. All sites are referenced and assessed in the Exmouth site report - [sal-022-exmouth-site-selection-report.pdf](#)

Exmo_47 - Land west of Hulham Road - Exmouth

- 7.2 This site is to the north of but well related to the built form of Exmouth. It abuts existing built development and is close to a range of facilities. It does, however, also abut an historic park/garden and is close to heritage assets. In consultation feedback Historic England consider the allocation to be unsound because development, in their opinion, would result in harm to the significance of three grade 1 listed buildings and the grade II Registered Park and Garden. Though site promoters supported the allocation.
- 7.3 Conservation Officers at the council are concerned that, whilst visual impact may be acceptable, noise, loss of tranquillity, lighting etc will cause harm to the setting, from a built heritage perspective. Comments are set out below.

The allocation site is close to the Grade I Point in View Chapel and Grade I The Manse, also historically part of the gardens associated with this and Grade I A La Ronde. There are a pair of modern semi-detached cottages to the south of The Manse, between this building and the site.

When viewed from the chapel, there is no intervisibility between this and the site as the land drops off to the south and there are mature trees on the south boundary of the chapel site. There may be some visibility between the LP site and the rear of The Manse so this would need to be carefully considered if the allocation is retained. In terms of the impact on the listed buildings I feel that development on the site could be acceptable, subject to an adequate landscaped buffer and tree / hedge screening on the northern boundary, with development towards the southern end and none at the northern end where the rooftops may be visible in context with the listed buildings.

My main concern is the relationship between the LP site and the registered park and garden associated with the Chapel, Manse and A La Ronde, which is directly adjacent to the LP site boundary. However, the impact on the setting of the designated park is such that development on this linear site could lead to an unacceptable level of harm unless a landscaping scheme can reduce the harm to an acceptable level. This needs to be assessed further. Ideally, this site will be omitted as only 15 houses are proposed.

- 7.4 It is noted that comments raised, specifically from a heritage impact perspective raise concerns around the suitability of this site for development. However, potential adverse heritage impacts need to be considered in the overall planning balance, including other factors pointing to the suitability of this site for development and the strategic role, relevance and need to accommodate new development at Exmouth.
- 7.5 As drafted policy highlights heritage concerns and considerations. Policy as drafted specifically states “.....*The sensitive historic setting of this site, with a Registered Park or Garden to the northern and western site boundaries is such that any scheme will need to be sensitively designed to avoid adverse impacts. Built development should be accommodated in the southerly parts of the site only.*”
- 7.6 In future redrafting heritage concerns can be more fully emphasised stressing the need for a high quality scheme and that any planning application will need to be accompanied by a heritage assessment that demonstrate, at worst, nil/minimal net negative heritage impacts and that to achieve this outcome housing numbers may need to be slightly lower than the allocation number. But given the small scale of the size any such lower development level would have an insignificant impact on overall housing numbers in the plan (on this basis full deletion of the site, as a one off for Exmouth, would have insignificant impacts).
- 7.7 **Officer recommendation** - Retain the site as an allocation for 15 dwellings though with policy refinement to follow to more fully emphasise heritage protection matters.

Exmo_20 - Land at St John's - Exmouth

- 7.8 This site on the north-eastern side of Exmouth is physically close to the built form of the town and southern site parts in particular are visually very well screened by mature planting within the site and to site boundaries. The site provides significant mixed-use development potential and is accessible (will be with the proposed new access), especially southern parts, to a range of existing facilities.
- 7.9 Main issues raised during the consultation included:
- Harm to the Pebblebed Heaths SAC/SPA: concerns include air quality, recreational pressure, and habitat fragmentation. (Devon Wildlife Trust, RSPB, Natural England, Environment Agency, Individuals)
 - Loss of biodiversity, ancient woodland, and wildlife corridors. (Devon Wildlife Trust, Individuals)
 - Adverse impact on the setting of St John in the Wilderness Church (Grade II*) and other heritage assets. (Historic England, Individuals)
 - Loss of tranquillity, dark skies, and rural character. (Historic England, Individuals)
 - Flood risk due to clay soils and upstream location relative to Withycombe Brook. (Environment Agency, Individuals)
 - Poor access from B3179 and Southern Wood; concerns about traffic, safety, and sustainability. (Devon County Council, Individuals)

- Unsustainable location due to distance from services and facilities. (National Highways, Individuals)
- Allegations of procedural flaws: site not properly consulted on at Regulation 18 stage. (Individuals, Community Groups)
- Support for the allocation and its deliverability. (Planning Consultant/Developer)

7.10 Whilst noting there were a large number of objections to this site but this is far from unique for planning proposals.

Landscape considerations at Exmo_20

- 7.11 With respect to landscape considerations 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.
- 7.12 The site has a south-westerly 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, substantial 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. There are also views across the town and Exe Estuary from the higher fields below the plateau.
- 7.13 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.
- 7.14 There is some potential for partial views of the developable parts of the site from the National Landscape on higher ground between Salterton Road and the coast. There are also views across the site from a short section of St Johns Road where the site boundary abuts it.
- 7.15 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 hedge banks and woodland creation.
- 7.16 The site currently affords poor opportunities for active travel connections. As an access from the B3179 would be somewhat remote from local services, new cycle and pedestrian links should be provided onto St Johns Road to the east and also to the

Meadow View estate from the southwest corner of the site. The latter would offer onward links to Liverton Business Park and Salterton Road.

- 7.17 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 site should be retained and reinforced with additional planting and habitat creation. Natural England require fencing/ buffering of any onsite SANG from the SAC/SPA albeit 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.
- 7.18 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 addressing the setting 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 provision of foot/ cycle path links to the Meadow View estate and Liverton Business Park and/ or appropriate financial contributions towards securing these.
- 7.19 There are, therefore, landscape concerns that we do need to be aware of but these can be dealt with through policy refinement that will lead to a high-quality comprehensive masterplan. Furthermore, given how well screened the site is (specifically the southerly site parts that are proposed for development) there is very little intervisibility with surrounding areas.

Mineral considerations at Exmo_20

- 7.20 We would also wish to highlight a minerals consideration that applies to this site, as raised in comment by Devon County Council, as the minerals planning authority. The County Council highlighted that the northern part of the site falls within a mineral safeguarding area, around which, and of a slightly larger area, is a county council defined Mineral Consultation Area. This consultation area mostly coincides with, though is slightly larger than, the Pebblebed Heaths 400 metre zone.
- 7.21 The Devon Minerals Plan seeks to ensure that sufficient and appropriate amounts and types of minerals are safeguarded and can be extracted to meet future needs, should demand arise and extraction is commercially and technically viable.
- 7.22 The role of safeguarding areas is to ensure that non-mineral development does not sterilise or constrain future mineral extraction. There can, however, be exceptions where a technically robust and objective Mineral Resource Assessment is undertaken by a qualified person that demonstrates that extraction of the mineral resource has no current or potential economic value, when prior extraction takes place, or where the use is temporary and will be removed prior to any future mineral working. This reflects Policy M2 of the Devon Minerals Plan.
- 7.23 Allocating a site area that extends into the Mineral Safeguarding Area and Mineral Consultation Area provides potential for such an assessment to be undertaken and if

this concludes that the resource has no current or future potential, non-mineral development may be considered. However, it should be noted that other significant development constraints apply across most of the land that falls in the consultation area anyway. If the mineral constraint were lifted it could provide some greater scope and site capacity to accommodate some extra areas of built development and potentially, and more so, extra open space and recreational potential for the land.

- 7.24 The image below/over the page illustrates the extent of the site and the approximate boundary of the Mineral Consultation Area. For reference purposes it also shows the St John in the Wilderness Church.



- 7.25 The changes recommended to plan policy in respect of minerals matters have been discussed with officers of Devon County Council who have considered the mineral resource, proposed use, existing constraints, and the strategic nature of the allocation.

Heritage considerations at Exmo_20

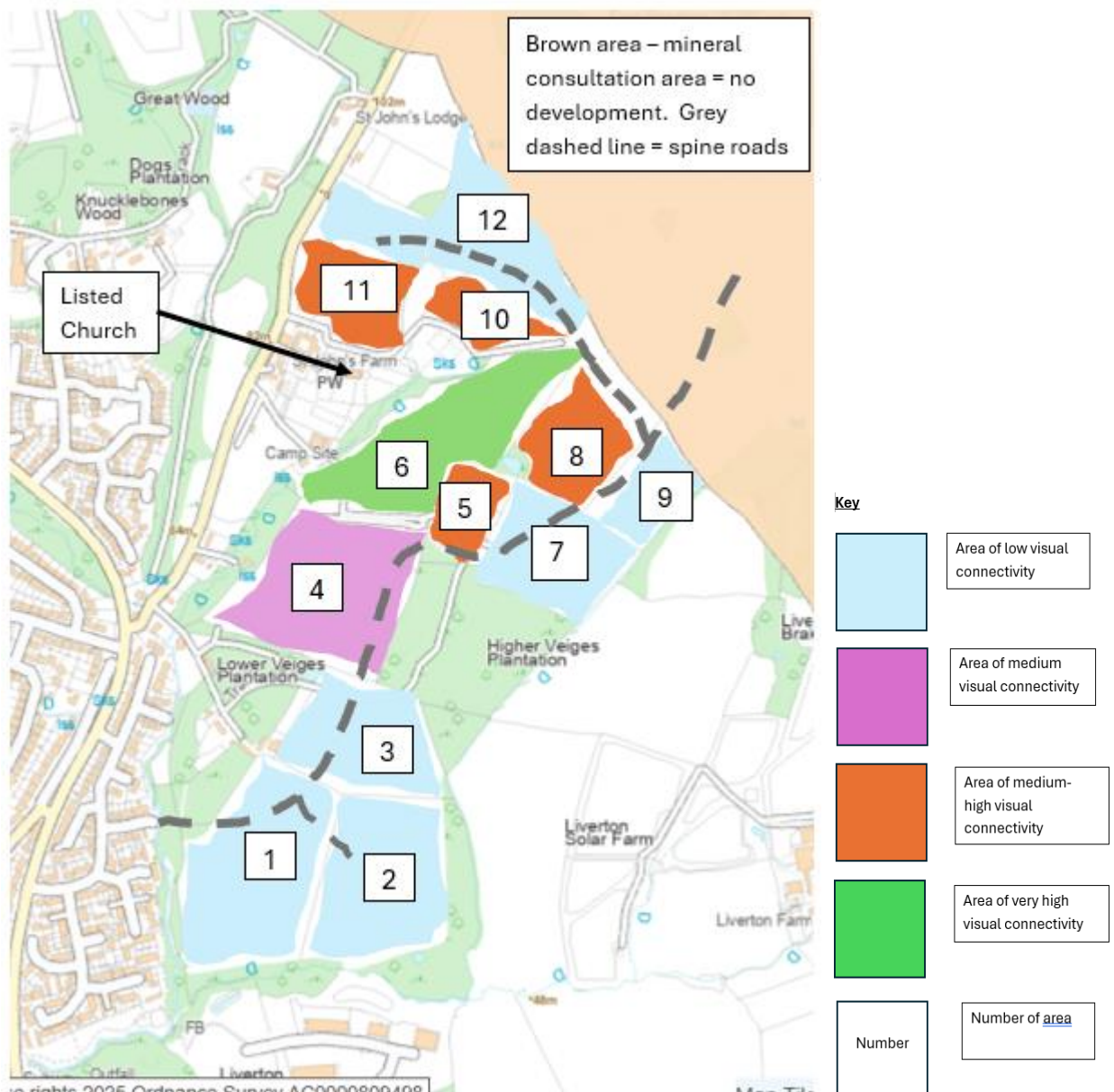
- 7.26 There is a statutory obligation to have special regard to the desirability of preserving listed buildings and their settings and this is especially pertinent as St John in the

Wilderness Church, a Grade 2* listed building, adjoins Exmo_20. Development would not directly impact the listed building itself but has the potential to significantly harm its setting.

- 7.27 Setting can be described as the surroundings in which an asset is experienced and may therefore be more extensive than its curtilage. The extent and importance of setting is often expressed by reference to visual considerations, including views of or from an asset and the way in which the asset is experienced in its environment. The policy objectives in the NPPF and the PPG establish the twin roles of setting: it can contribute to the significance of a heritage asset, and it can allow that significance to be appreciated. An assessment of the impact on the setting of the Church has been undertaken, and takes into account the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- 7.28 Historic England advise that “Being tall structures, church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view.”
- 7.29 This element of analysis specifically assesses the visual connectivity, and in this respect sensitivity, to development of separately identified land parcels to the St John in the Wilderness church. Assessment is based on ground level assessment (human eye level) from points within the churchyard. The church tower is not particularly high and will have limited public access but from the top of the tower more expansive views would be expected bearing in mind that, by design, the church tower is meant to be widely seen and to dominate the landscape.
- 7.30 The assessment is based on visibility of the ground level in adjoining nearby land areas and considers the height of buildings and their potential impact in terms of elevation. Recognising that the field pattern has changed very little since the church was largely rebuilt in 1748 (and little changed since its original construction in 1348), the identified land parcels are for the most part based on existing historic field boundaries, though in some cases fields/areas that have similar characteristics/visual connectivity have been merged. In other cases fields are split where differing characteristics exist. Only the main fields are captured in the assessment, there are some smaller pockets of land that fall between these that have not been assessed and as such could be looked upon as extras.
- 7.31 We have identified four area types in terms of visual connectivity:
- **Very High** – areas that are visually very well connected and unsuited to development
 - **Medium-high** – areas where all or parts of a site have a clear visual link.

- **Medium** – areas where there are parts of the site that have a visual link, but of lesser prominence/proximity.
- **Low** – areas where there is either nil visual link or at most it is only in longer distance views.

7.32 These areas are shown on the map below/over along with sensitivity conclusions reached. A site visit was undertaken in August 2025 and as a broad-brush observation it should be noted that the boundaries to the graveyard surrounding the church, both the original graveyard and a more recent extension to the east, are very heavily planted with both deciduous and evergreen trees. The extent and density of planting means that in the summer months there are limited views and intervisibility with surrounding fields. In the winter, with the falling of leaves, this will increase but even then the evergreens and mass of branches on the deciduous trees will result in a retained degree of screening.



Above – Map showing areas of the site by visual connectivity to the listed church. For further details see table following para. 7.39

7.33 The church is surrounded by an old original graveyard which lies on gently sloping land that forms part of the general wider upward sweep on land from south to north. This creates a sense of tranquillity and remoteness. Some views out from this original

graveyard area are adversely impacted, however, by an existing caravan park and what appears to be a caravan storage area to the south, this causes a degree of visual intrusiveness. There are existing dwellings to the west of the churchyard, and in close proximity to it, and in part directly overlooking. To the east of the original graveyard is a newer graveyard area that sits within a very distinct hollow in the landscape. Its sunken position, along with dense existing boundary planting limit outward views, especially to the north where the land rises up quite sharply giving this area a sense of enclosure. At night time, artificial lighting (especially in winter) from new development if poorly provided for could be particularly intrusive to the graveyard areas.

- 7.34 The site assessment work needs to be seen and read in the context of the way that the church and churchyard sit within the landscape and specifically the mature dense vegetation that limits views.
- 7.35 We have undertaken some finer grained assessment of comparative sensitivity of different site parts to inform possible overall capacity. For this work we have worked on a net density assumption of 40 new homes being built per hectare for those areas with a low visual connectivity. For areas with very high and medium-high visual connectivity we have assumed zero dwellings - such areas could remain as open space to serve development. For areas ranked as medium we have run two scenarios, one at a low figure 20 homes per hectare and the other at zero. The 20 homes per hectare would provide for either low density-built development (for example homes in large plots, perhaps single storey in potentially more sensitive areas) and/or it could provide for areas of green space accessible to the public and some more typical density new homes (for example open space in more sensitive parts and homes in less).
- 7.36 Assessment work undertaken as part of the sustainability appraisal of the Cranbrook Plan – see Appendix 3 of [Cranbrook Development Plan: Issues and Options Report](#) shows net density levels, at the time of assessment for homes built, averaging just over 40 dwellings to the hectare. The net area being defined as including:
- houses and gardens;
 - car parking courts
 - estate roads and footpaths;
 - incidental open space – including small play spaces and other local green spaces.
- 7.37 The net areas exclude larger scale, strategic and non-residential features such as strategic highways and access roads, major landscaping areas and parkland, playing fields, schools, community and businesses uses and larger scale play areas. For strategic highways and access roads (noting an indicative spine road is diagrammatically shown on the map) we have assumed a substantive area with a width of 15 metres that is discounted from recorded area totals.
- 7.38 It is stressed that this work is not a formal detailed assessment and in no sense is it intended to form policy or establish any specific set of proposals or patterns for development. Rather it is illustrative and approximate of comparative areas of sensitivity and is set out as a means to illustrate the scale or level of development that could potentially be achieved by directing development to the less or nil sensitive

locations only. It is worth highlighting, however, that development when well designed and implemented can frame and enhance heritage assets and as such 'sensitive areas' can in some cases be appropriate and positive for development and built uses.

7.39 In the table below/over we set out details of assessment undertaken.

Table of assessment if identified areas

Area	Net area in hectares	Visual connectivity	Homes per hectare	Homes total	Alternative homes per hectare	Alt homes total	Comments
1	4.79	Low	40	191	40	191	This area is very well screened, it falls some distance from the church and no visual connectivity was recorded.
2	4.17	Low	40	167	40	167	This area is very well screened, it falls some distance from the church and no visual connectivity was recorded.
3	3.04	Low	40	121	40	121	This area is very well screened and it falls some distance from the church. The only possible and at most slight visual connectivity would apply to the most northerly parts of the site.
4	4.50	Medium	20	90	0	0	This area was recorded as having a medium sensitivity. More northerly parts have some visual links, with the northern site boundary falling on a minor ridge. But as the land slopes southward much of this area has limited or nil visual connection.
5	1.11	Med-high	0	0	0	0	This area is comparatively close to the church. Its western sides have visual connections and a ridgeline runs north-south through the site. But moving eastward the area becomes more of a plateau, slopes of to the east and visual connection diminish/are lost.
6	4.70	Very High	0	0	0	0	This area is very prominent in views and has a particularly tranquil character. Noise and light impacts will be particularly intrusive.
7	2.56	Low	40	102	40	102	This area slopes downward from west to east and is not visually connected to the church.
8	2.80	Med-high	0	0	0	0	The western edge of this site is defined by a mature hedgerow that sits in views above the church. The hedgerow and lie of the land mean that at ground level views into this are not seen. Though built development, especially at two storeys, there could be some visual links as ridgeline considerations as with area 5 also apply. Moving eastward across the area visually connectivity (or potential for) diminishes.

Area	Net area in hectares	Visual connectivity	Homes per hectare	Homes total	Alternative homes per hectare	Alt homes total	Comments
9	1.48	Low	40	59	40	59	Whilst land slopes upwards toward this area the slope is on a shallow gradient than land nearer to the church and also the area and especially easterly parts are some distance from the church. The lie of the land, and hedgerow boundaries are such that visual connections are limited.
10	1.02	Med-high	0	0	0	0	This area lies to the north of the newer graveyard area. It sits above the graveyard but because of the rising nature of the land, the hollow within which the graveyard sits and vegetation cover there is very limited visual connection, really only southerly parts, of this area. Sensitive to light intrusion.
11	1.32	Med-high	0	0	0	0	The south east of this area lies next to a part of the old church yard, albeit with a deep layer of vegetation to the boundary within and to the sides of what appears the remains of an old sunken lane. This area stretches upward to the north and sensitivity diminishes as the extent of separation from the churchyard increases.
12	3.79	Low	40	151	40	151	This area forms the northerly parts of fields that are recorded as medium high sensitivity to the south. On account of distance from the church and graveyard and intervening vegetation cover a low sensitivity is recorded.
Total	35.25			848		792	

The above is to read in conjunction with the site map.

7.40 In the above assessment building homes on the low and medium sensitive land (as described) could accommodate around 848 homes. Though this figure does not take into account the 2 hectares of employment land and land for community uses. For community uses, and using Cranbrook as an example, the Younghayes centre and the parade of shops next to it and associated service yards, parking, paved areas and landscaping occupy an area of around ½ hectare. A policy area of 2½ hectares built on land calculated at 40 homes to the hectare would occupy the land equivalent of 100 homes. Deducting this from the 848 total would leave a capacity figure of 748, i.e. some way above the 700 homes allocated in the local plan. The scenario of not building on the medium sensitive land (i.e. building on low sensitivity land only) would accommodate 792 new homes, or with the 100 home deduction a figure of 692. But it is important to reiterate that the medium sensitivity will apply to some parts of areas in this classification but not all parts and some of the medium-high classified areas could well have some development potential as well.

Proposed redrafting of policy for Exmo_20

- 7.41 Set out below/over the page is proposed revised wording that allocates Site Exmo_20 for development. These changes stress heritage sensitivity concerns, opportunities to enhance the natural beauty of the national landscape, restrict street lighting along the proposed access road serving the site and a requirement for provision of foot/ cycle path links to the Meadow View estate and Liverton Business Park and/ or appropriate financial contributions towards securing these. They also refer to mineral matters. A heritage assessment and masterplan have been produced by the prospective developer that respond to some of these issues. With a well-designed scheme a good development should be achieved.
- 7.42 In making officer recommended changes to the plan we would highlight that we are not recommending changes to the number of 700 new homes being accommodated at the site. Retention of the allocation, deletion and other options, in order to give a comprehensive overview, are listed below:
- a) Retain the allocation of Exmo_20 (full spatial extent and housing numbers) in line with the officer recommendation, albeit noting minerals, heritage and Pebblebed Heath constraints on development.
 - b) Delete the allocation of Exmo_20 from the plan and make associated boundary changes – specifically redraw the Settlement boundary to exclude Exmo_20 noting that this is likely to be a significant change to the plan that takes it outside of the transitional arrangements in the new NPPF.
 - c) Reduce the site area of Exmo_20 in respect of land in the northerly part of the site, for example to exclude land that falls in the Minerals Consultation Area (or potentially a greater area). Though the access road from the north would remain and run through this area. This option need not impact on site capacity for 700 new homes but could depending on the extent of any reduction. A

significant reduction in housing numbers could generate financial viability concerns.

- d) Reduce the site area of Exmo_20 more substantially so that development is just focussed on southerly site parts. In much earlier draft plan work this was the suggested development form with an allocation shown for around 150 new homes. Though this would be reliant on road access from the road called Southern Wood to the south of the site. Previously Devon County Council advised of the technical acceptability in highway terms for this option at this level of development (150 homes). However, even with a reduced site area, for example covering the southerly three site fields, there could be capacity for close to 300 new homes and open space provision, but potential acceptability in highway terms, coming via Southern Wood, at this point in time has not been tested at this level of development and it may well not be deemed as acceptable.

Proposed redrafting of: Strategic Policy SD01: In respect of Exmo_20

Please note that of direct relevance to this policy, but also elsewhere, a plan change is proposed that we show all Mineral Consultation Areas on the policies map.

7.43 Officer recommendation - Retain Exmo_20 as an allocation for 700 dwellings with amended policy wording as set out above.

To address the issues highlighted above, in the event that Members are minded to retain the allocation in accordance with officers' recommendation then the proposed revised wording for the allocation is also recommended:

Land at St John's (Exmo_20)

Land at St John's, on the eastern side of Exmouth, is allocated for a comprehensive development scheme to accommodate:

- A. Social and community facilities;
- B. Around 700 new homes; and
- C. At least 2 hectares of employment land.

This site allocation will need to come forward on the basis of an agreed masterplan and access strategy for the whole site that clearly demonstrates how phased comprehensive development will be undertaken and implemented, including with appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Full agreement will be required before any specific parcels of land can come forward for development.

Built development will need to be concentrated in the southern parts of the site and the scheme will need to place considerable emphasis on protection of the setting and tranquillity of nearby heritage assets, specifically St John in the Wilderness church.

Support will be given for expansion of the churchyard, to provide more burial/interment of ashes space at St John in the Wilderness.

A detailed heritage assessment will need to accompany any overarching planning application/s for the site or any other planning applications for any parts of the site that are visible from or otherwise lie in close proximity to, or impact upon the setting of, any listed buildings or other heritage assets at or close to the site, this explicitly includes the St John in the Wilderness church. An extensive area must be established around the church in master planning work within which built development will not be allowed, though subject to not having adverse heritage impacts open space non-sports pitch/noisy recreational activities will be permitted.

Northern parts of the allocated site fall in a Minerals Safeguarding Area (for sand and gravel resources) and associated larger Minerals Consultation Area as defined in the Devon County Council Minerals Development Plan 2011-2033 (and as may be refined or appear in amended form in any subsequent minerals Local Plan). The safeguarding area is shown on the local plan policies map.

Planning permission for development or use of the land (including for open space and recreational uses) in the Minerals Safeguarding Area will not be permitted unless the development demonstrates through a robust Mineral Resource Assessment that the mineral resource is not of current or potential economic value. Should a Mineral Resource Assessment show that the mineral resource is of current or potential economic value, prior extraction of the mineral resource in advance of development should be undertaken; or a non-mineral development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction or operation within the timescale that the mineral resource is likely to be needed.

It is recommended that any applicant engages with the Mineral Planning Authority during the design stage of any development proposal.

The only exception to this constraint will be provision of an access road and associated parallel running footway and paths/cycleway that link built development at the site and built development to the B3179 highway to the north of the site. This road access and any associated works must be sensitively designed to avoid any possible adverse impacts on the National Landscape. Street lighting should be avoided and new planting should provide screening. Development of this site should actively support opportunities to enhance the natural beauty of the national landscape.

Development in the Mineral Consultation Area must be designed in a way to not constrain any future mineral working, for example, locating less sensitive uses adjacent to the Mineral Safeguarding Area.

Parts of the site and adjoining areas, especially woodlands are of biodiversity importance and sensitivity and great care will be needed in developing proposals to ensure their protection and enhancement. Over and above mineral constraints new ~~New~~ homes and other development that would result in unacceptable impacts will not be permitted within 400 meters of the Pebblebed Heaths. The development will need to be

supported by a new developer provided SANGs, brought forward and implemented as part of the overall scheme on the allocated or on nearby land.

Vehicular access, to accommodate modest levels of development, will be allowed for southern site parts from the road 'Southern Wood', subject to detailed assessment of highway access acceptability and objective review of local road and junction capacity ~~and with mitigation provided to address unacceptable adverse impacts~~. Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the north. Mitigation measures may be required to address potentially unacceptable adverse highways impacts, including at locations on the wider highway network. High quality, safe and attractive to use pedestrian, cycle and public transport access, particularly providing southerly site links into Exmouth and to nearby services, facilities and job opportunities, will need to be an essential part of the overall development scheme. As part of this, consideration should be given to alterations to vehicular access on St John's Road, in order to help create quiet routes for walking and cycling.

Exmo_17 - Land to the South of Littleham - Exmouth

- 7.44 Allocation of this site is consistent with the spatial strategy, noting the relevance of growth at Exmouth. The site is close to a range of services and facilities and offers significant development at the only Principal Centre in the District.
- 7.45 Matters raised in consultation responses included:
- Development within a designated National Landscape (formerly AONB) is strongly opposed. (Historic England, Individuals)
 - Potential harm to the setting of St Margaret and St Andrews Church and surrounding historic landscape. (Historic England, Individuals)
 - Concerns about traffic, access, and pressure on local infrastructure and services. (Individuals)
 - Support for the allocation and its deliverability. (Planning Consultant/Developer):
- 7.46 With respect to site Exmo_17, the following observations are made, though noting that comments are written in the context of an indicative masterplan currently being promoted by the prospective developers, rather than specifically local plan allocation and policy wording matters.
- 7.47 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.
- 7.48 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.

- 7.49 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.
- 7.50 Hedge removal should be minimised and any loss compensated for within the scheme proposals. A high standard of site and building design and appropriate materials reflecting local distinctiveness will be required with extensive planting to help to screen and filter built form and associated infrastructure in key views from the National Landscape.
- 7.51 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.
- 7.52 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. 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.
- 7.53 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. 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.
- 7.54 The policy also requires SANGs provision together with the enhancement of the current cycle route within an attractive 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.
- 7.55 Policy amendments should include 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 as well as the provision of circular routes within the site and connections to the wider network of footpaths and cycleways.
- 7.56 Conservation officers at the council, from a built heritage perspective have reviewed this allocation. Comments are set out below noting that they are specifically made in respect of an indicative layout promoted by the prospective developers in pre-

application engagement work. Whilst related to this indicative layout they do have full relevance to the matters of principle that are relevant to a local plan allocation.

The development site is currently open land, in which there are glimpsed views from the churchyard of the Grade II listed Parish Church of St Margaret and St Andrew. These views are limited due to the tall wall surrounding the churchyard. In terms of views towards the church, the church tower rises above the mature tree line and is a prominent feature when viewed from the east and north-east and has been part of the landscape since the 15th century (or even earlier). The church serves Littleham, which was a small settlement in a rural setting until the 20th century when the town of Exmouth expanded from the west. This expansion has gradually encroached up the setting of the church, with open views surviving to the east and north-east where the allocation site is proposed. This encroachment is particularly evident when walking north-west through the churchyard where a row of existing mid-late 20th century dwellings which back onto the churchyard is highly prominent and harmful. The loss of the only surviving area of open space would lead to a degree of harm to the setting of the church in terms of a slight visual impact, the loss of open space, noise and light pollution.*

The highest degree of harm would be at the southern end of the allocation site which the concept plan shows as a SANG and a cemetery extension. These open spaces would go some way towards maintaining countryside views and a peaceful environment, protecting the setting of the church. Landscaping and tree/ hedge planting along the west boundary of the development to the south of the former railway line will also help to protect the setting of the churchyard extension to the north of the church.

In this instance I feel that the indicative layout is acceptable, with the public benefits of providing landscaping and ecology enhancements outweighing any harm, subject to the scale, design and materials of the dwellings being carefully considered, and if necessary, repairs to the churchyard wall carried out to ensure it remains an effective barrier.

- 7.57 On the basis of this heritage feedback, and prior heritage assessment work undertaken, it is considered that the site forms a sound allocation in the local plan.
- 7.58 **Officer recommendation - Retain Exmo_17 as an allocation for 410 dwellings.**
Though in due course we will look to refine policy wording to afford greater protection of heritage assets and landscape protection.

Exmo_08 and Exmo_16 combined - Littleham Fields - Exmouth

- 7.59 Allocation of this site is consistent with the spatial strategy, these sites are close to facilities at Littleham.
- 7.60 Main issues recorded in consultation were:
- Development would harm the setting of the Grade II listed Green Farmhouse and the Maer Valley landscape. (Historic England, Individuals)
 - The site supports diverse wildlife and is ecologically sensitive. (Individuals)

- Local infrastructure—roads, schools, sewage, and water—is already under strain. (Individuals)
- The area is prone to flooding, with concerns about increased runoff. (Individuals)
- Access via Parlour Meadow is unsuitable due to congestion and industrial traffic. (Individuals)

There were calls for:

- Remove the allocation due to landscape, heritage, and infrastructure constraints. (Historic England, Individuals)
- If retained, require detailed assessment and mitigation of heritage impacts. (Historic England)
- Explore alternative access options, such as Elm Lane. (Individuals)
- Prioritise brownfield development and protect high-grade agricultural land. (Individuals)

- 7.26 The chief concern highlighted in representation around this site related to potential adverse heritage impacts with, amongst others, Historic England raising specific concerns. In initial site assessment work it was acknowledged and recognised that there were heritage considerations of relevance to this site. The Grade II listed Green Farm is immediately to the southwest of the site. This farm and its immediate garden area is an attractive and important heritage asset. It does not, however, sit within a clear and obvious countryside and undeveloped setting, rather its location is urban fringe.
- 7.27 Its setting and an overarching sense of remoteness or rurality is compromised (at least to some degree) by existing development to the east and of more visual significance new development sitting above the ridgeline, with a clear visual connection, to the north of the site. In addition, whilst acknowledging that they are agricultural buildings, there are a range of larger format structures to the west of the listed farmhouse that are not complimentary to its form, structure or character, though there are also some older and attractive farm buildings as well.
- 7.28 As drafted policy wording for this site advises: “.....*There is also the listed Green Farm to the west of the site the setting of which will need to be carefully addressed.*” There is, therefore, already heritage sensitivity considerations written into policy and these were written in the context of recognising the sloping nature of the site and the fact that it does overlook the listed farmhouse.
- 7.29 We would also highlight that the Grade I Listed St Margaret and St Andrew's Church lies relatively close, though around 140 metres away from and to the northeast of site. In summer months, with tree coverage there is no apparent visual connection between the church graveyard and the site. In winter months visibility will be greater but would be seen within the context of existing intervening development between the church and the site and also, potentially, new elevated development that sits above the church.
- 7.30 The heritage considerations and concerns related to this site, and the comparative negatives to development need to be seen in the context of the need to accommodate development and wider comparative positives associated with this site. On balance

officer conclusion, despite objections is that the site is a reasonable choice for allocation. However, it is seen as appropriate to strengthen plan policy in the light of heritage considerations to further stress their significance. It would also be appropriate to set out in policy that as part of site development open space uses should be located in the south-westerly parts of the site (specifically Exmo_08) and these are to be designed to meet site needs but also to help protect the setting of the listed farmhouse. Further policy should also be refined to advise of the explicit need for a heritage assessment to clearly set out how heritage considerations have been fully taken into account and potential adverse impacts minimised. This should include the listed Grade I church to the east of the site and may place limitations on development potential of higher land on the site. This work will need to accompany any planning application for the development of the site. Plan policy should also be refined to advise that final site capacity may need to be lower than allocation levels in order to overcome heritage concerns at the application stage and as demonstrated through further assessment work.

7.31 Officer recommendation - Retain Exmo_08 and Exmo_16 combined as allocations for 45 dwellings.

Exmo_18 - Littleham Fields, next to Liverton Business Park- Exmouth

- 7.61 This site is allocated for employment uses in the plan. It is on the eastern side of the town next to the existing Liverton Business park.
- 7.62 This site is not located in the East Devon 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. The site is within Landscape Character Type 1B: Open coastal plateaux, where landscape guidelines include protecting skylines and ridgetops that form the settings to settlements. The site drops steeply from Salterton Road at a gradient of 1:5 and 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. Existing hedges to the southern and eastern site boundaries should be reinforced and appropriately managed and additional trees provided.
- 7.63 It is considered that the allocation is sound, subject to additions to the plan policy to mitigate landscape impacts as set out below. This would have the effect of reducing the amount of land available for employment uses on the site from 2.7ha to around 1.8ha.

Land directly to the East of Liverton Business Park (Exmo_18)

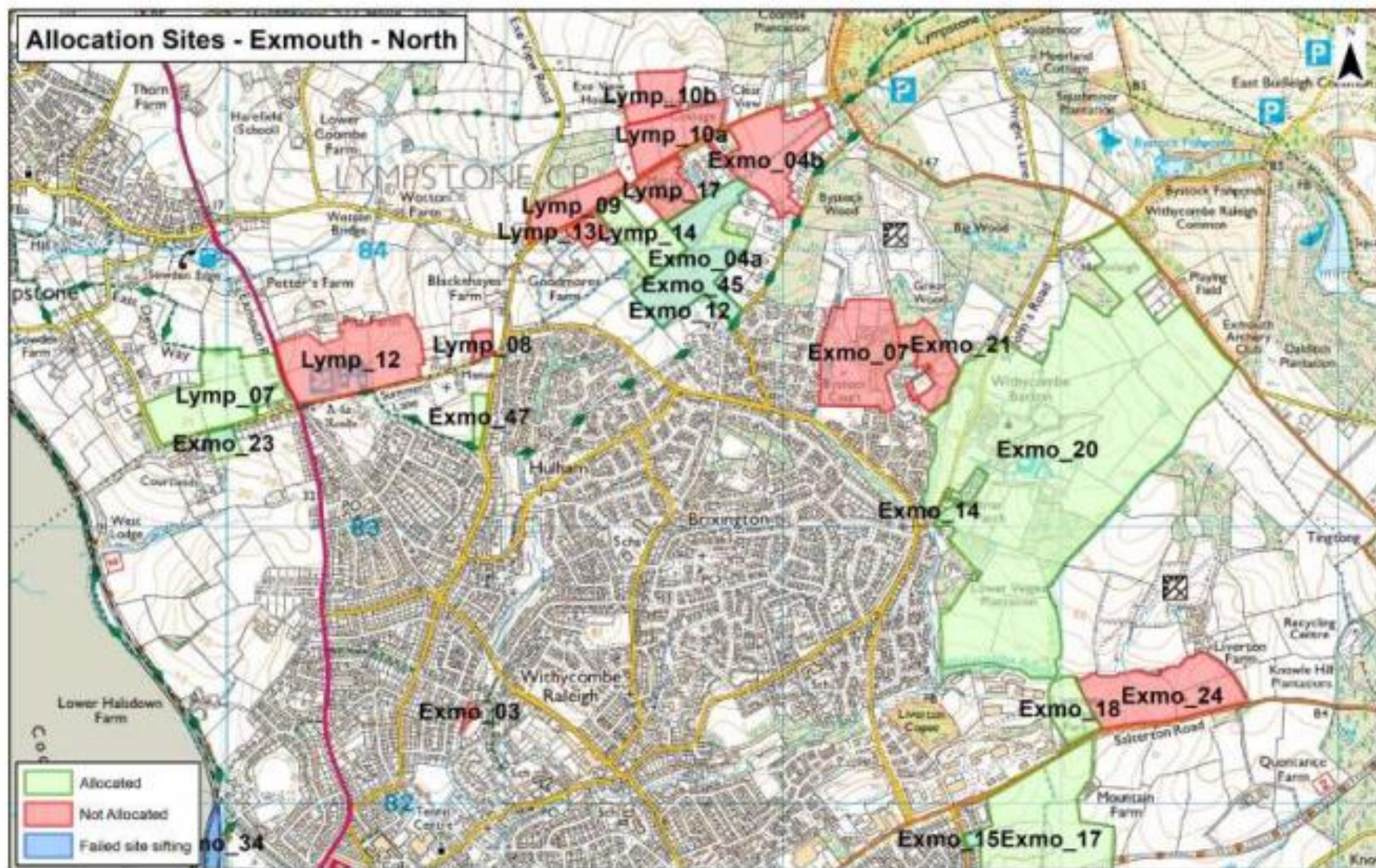
This land east of Liverton Business Park is allocated for employment uses and will form an extension to the existing business park and extends to around 2.7 hectares in size. Development should be designed to take account of the relationship between the site and the East Devon National Landscape, with vehicular access from the Liverton Business Park (not Salterton Road) and no built development 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.

7.64 Officer recommendation - Retain Exmo_18 as an employment allocation.

Alternative site options at Exmouth

- 7.65 Should committee wish to not allocate, in part or full, any of the housing sites at Exmouth, or wish to not allocate any additional sites (for example in response to plan objections in respect of claims of under-delivery) there are alternative site options available albeit not recommended. Those sites that were considered in the site assessment work and that were debated by Committee in 2024, are:
- Exmo_03 – 5 dwgs - Land at bottom of Bapton Lane
 - Exmo_07 – 40 dwgs - Bystock Court, Old Bystock Drive
 - Exmo_24 - 124 dwgs - Land to the north of Salterton Road
 - Lymp_08 – 14 dwgs - Land off Summer Lane, Exmouth
 - Lymp_09 – 54 dwgs - Land fronting Hulham Road
 - Lymp_10 – 100 dwgs - Land off Hulham Road, Lympstone
 - Lymp_12 – 174 dwgs - land fronting A376 and Summer Lane
 - Lymp_13 – 25 dwgs - Kings Garden & Leisure, Higher Hulham Rd
 - Lymp_17 – 80 dwgs - Land at Marley House
 - Exmo_21 – 15 dwgs - Land east of Bystock court
- 7.66 These sites, in total, would offer capacity for accommodating approximately 631 dwellings (a figure that falls someway short of the Exmo_20 allocation of 700). It should be noted that a number of additional sites failed at site sifting and were not otherwise carried forward for assessment, nor had other justifying grounds for assessment.
- 7.67 Sites assessed at Exmouth/referenced in this committee report are shown on the maps below, as taken from the Exmouth site assessment report - [sal-022-exmouth-site-selection-report.pdf](#)

Allocation Sites - Exmouth - North



A horizontal number line with tick marks at 0, 0.475, 0.95, 1.9, 2.85, and 3.8. The line is labeled 'x' at the right end.

Allocation Sites - Exmouth - South



0 0.475 0.95 1.9 2.85 3.8 Kilometers

8 Sites at Axminster

- 8.1 Sites at Axminster that have been identified for further assessment are referenced below. After the listed sites there is a map showing their locations. We identify alternative sites at Axminster that could be allocated for development should committee wish to make amendments. All sites are referenced and assessed in the Axminster site report – [sal-005-axminster-site-selection-report.pdf](#).

Axmi_01a - Land west of Musbury Road

- 8.2 Site Axmi_01a is a 2ha employment allocation that was included in the plan because it was consistent with the spatial strategy. However, part of the site is at risk of flooding and development is further constrained by two World War II pill boxes. The policy requires the land between the pill boxes and the railway line to be kept as public open space.
- 8.3 In addition to the pill boxes, the Devon Historic Environment Record identifies potential areas of archaeological interest on the site including the potential route of the Fosse Way Roman Road, the route of the Axminster and Lyme Regis light railway, a trackway that may reflect an earlier feature and findspots for prehistoric flint and medieval pottery. The site is also close to two Scheduled Ancient Monuments (Newenham Abbey and a Roman Fort & Later Romano-British Settlement). Devon CC object to the allocation unless further archaeological work is undertaken.
- 8.4 Further archaeological investigation has been requested of the site owner but has not been undertaken. The site cannot be justified due to uncertainty over the extent and importance of archaeological remains.
- 8.5 **Officer recommendation – Remove Axmi_01 as an employment allocation -** Officers would not see the need to make alternative employment provision as the site is small and there is already adequate provision made at Axminster. It is recommended that the allocation be removed, and the settlement boundary be amended to exclude the site and land up to existing urban edge.

Axmi_02, Axmi_08 and Axmi_09 - Land east of Musbury Road

- 8.6 These three sites abut one another and are taken together as they form a single allocation in the local plan. They are allocated for 438 dwellings.
- 8.7 The land was allocated because it was consistent with the spatial strategy of the plan and the site has good access to facilities and employment, although concerns about landscape and heritage impacts were noted.
- 8.8 Matters raised in consultation responses included:

Main Issues:

- Heritage and archaeological sensitivity due to proximity to Roman Fort and Fosse Way. (Historic England, Devon County Council)
- Support the requirement for a masterplan on this site, especially to suitably manage the flood risks. (Environment Agency)
- Road safety concerns on A35 due to additional turning movements. (National Highways)
- Objection to employment allocation and community hall viability. (Planning Consultant)
- Road safety and access issues on Musbury Road. (Individuals)
- Inadequate sewerage infrastructure and surface water flooding. (Individual)
- Support for residential allocation and comprehensive masterplanning. (Developer)

Calls for:

- Removal of the site due to archaeological sensitivity and setting impacts. (Historic England)
- Desk-based assessment and site evaluation before allocation. (Historic England)
- Reference to the proximity of the strategic road network and road safety concerns. (National Highways)
- Clarification of community hall need and delivery mechanism. (Planning Consultant) • Rewording of bus stop requirements to reflect deliverability and best practice. (Planning Consultant)
- Flood mitigation and drainage infrastructure upgrades. (Individuals) • Road safety improvements and alternative access routes. (Individuals) • Removal of the site due to cumulative infrastructure and environmental constraints. (Individuals)

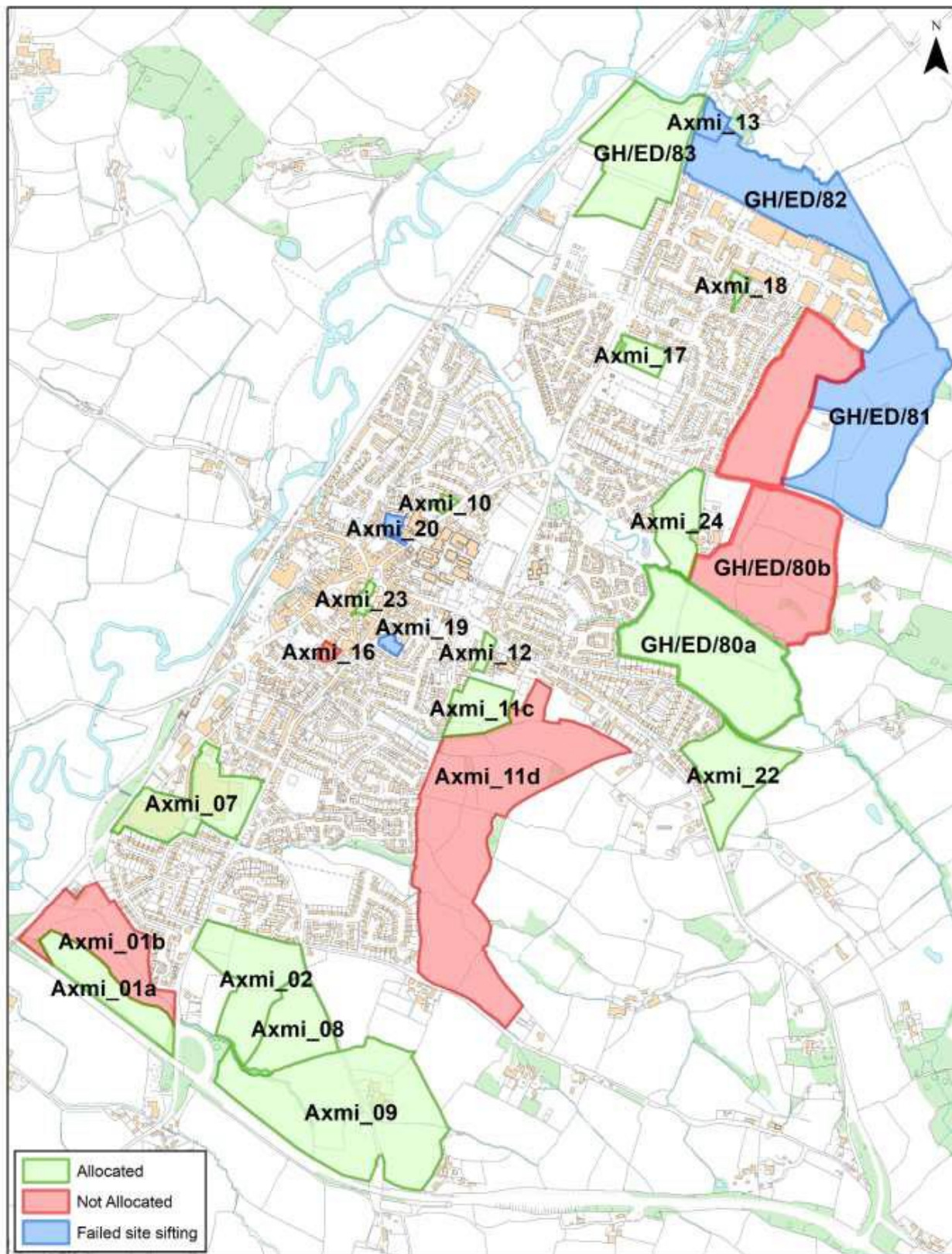
- 8.9 The Devon Historic Environment Record identifies potential areas of archaeological interest in the northern part of the site including the route of a Roman Road from Axminster to Honiton, defensive works dating from 1940 and Prehistoric, Roman & Medieval artefacts.
- 8.10 Devon CC object to the allocation until further archaeological work is undertaken. Historic England, in addition to archaeological objections, say the potential harm to the setting of the Scheduled Ancient Monument is considerable because built development across the site would remove or fundamentally alter the physical and visual relationship between the Scheduled Monument, the route of the nearby Roman Road and the landscape over which the fort would have had surveillance, falling to the River Axe before rising to the hills beyond.
- 8.11 Initial investigation work has shown that a Roman road crosses this site and has associated Romano British settlement remains. The remains may be significant enough to justify extending the boundary of the scheduled ancient monument, but until trenches are excavated it is not possible to know how much material has survived intact and therefore the significance of the site. Even if significant remains are found, it may be possible to provide a suitable access from Musbury Road to the remainder of the site and to keep the area of archaeological significance as open space, but until investigation work is further advanced it is not possible to know.

- 8.12 Officer recommendation – Subject to archaeological concerns not establishing an unreasonable constraint to development (this information is not currently available) retain the allocation of Axmi_02, Axmi_08 and Axmi_09 - Land east of Musbury Road.**

Alternative site options at Axminster

- 8.13 Should committee wish to not allocate any of the housing sites at Axminster (in this schedule or otherwise in the plan) then the following options to address any housing shortfall arising are identified but not recommended (numbers are approximate):
- Axmi_01b – 15 dwgs
 - Axmi_16 – 15 dwgs
 - Axmi_11d – 330 dwgs
 - GH/ED/80b – 169 dwgs
- 8.14 It should be noted that other sites failed site sifting and were not otherwise carried forward for assessment, nor had other justifying grounds for assessment. Sites assessed at Axminster in this committee report are shown on the maps below, as taken from the Axminster site assessment report.

Map of site options at Axminster – for assessment report see [sal-005-axminster-site-selection-report.pdf](#)



0 0.2 0.4 0.8 1.2 1.6 Kilometers

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9 Sites at Honiton

- 9.1 Sites at Honiton that have been identified for further assessment are referenced below. After the listed sites there is a map showing their locations. We identify alternative sites at Honiton that could be allocated for development should committee wish to make amendments. All sites are referenced and assessed in the Honiton site report – see: [sal-027-honiton-site-selection-report.pdf](#)

Honi_07, Honi_12 and Honi_13 - Land adjacent/near to St Michaels Church

- 9.2 These three allocations are taken together as they are close to and abut the grade II* listed St Michaels Church on the southern side of the town. In the local plan they are allocated for:
- Honi_07 and Honi 12 combined – 101 homes; and
 - Honi _13 – 10 Homes.
- 9.3 The sites were allocated because development would be consistent with the spatial strategy, with good access to facilities, public transport, town centre and employment land.
- 9.4 Matters raised in consultation responses included in respect of Honi_07 and Honi_12 – Land adjacent to St Michael's Church and south east of Cuckoo Down Lane:

Main Issues:

- Statement in policy that Honi_12 is dependent on Honi_07 for access is challenged due to separate ownership and potential for independent access. (Planning consultant on behalf of landowners)
- Concerns about landscape and heritage impact due to proximity to listed buildings and location within a National Landscape. (Town Council, Historic England)
- Legal compliance concerns over consultation process and late inclusion of Honi_12. (Town Council)

Calls For:

- Amend policy to allow for independent access to Honi_12 via Higher Brand Lane. (Planning consultant)
- Restrict Honi_07 to open space only, with built development limited to Honi_12. (Historic England) Stage 1 Publication East Devon Local Plan – Draft Consultation feedback report – July 2025
- Remove Honi_07 and Honi_12 from the plan due to landscape and heritage concerns. (Town Council)

- 9.5 Matters raised in consultation responses included in respect of Honi_13 – Land at Middle Hill, Church Hill

Main Issues:

- Site lies within the AONB and has very high landscape value. (Historic England)

- Close proximity to Grade II* listed Church of St Michael and Former Sexton's House; moderate heritage impact predicted. (Historic England, EDDC site assessment)

Calls For:

- Remove Honi_13 from the plan due to cumulative landscape and heritage impacts. (Historic England)

- 9.6 Honiton Town Council requested deletion of the allocation due to landscape/heritage impact and legitimacy of consultation process (due to late inclusion of Honi_12).
- 9.7 Historic England requested that Honi_07 be used as open space only due to impact on heritage assets.
- 9.8 Since the allocation was made the adjacent 'Former Sexton's House' has been listed as grade II. Furthermore, while the Church of St Michael and All Angels has been designated as a Grade II* listed building since 1949, a recent amendment to the listing has formally included the lych gate as part of the listed building. It is not considered that the impact on these heritage assets can be mitigated through policy wording.
- 9.9 Following officer assessment and bearing in mind consultation feedback it is not recommended that these sites are allocated for development. These sites are within the Blackdown Hills National Landscape and are partly adjacent to, and seen within the context, of the East Devon National Landscape. The allocation of these sites is not considered to be justified as they are prominently situated and sit poorly in relation to the established green urban edge and the setting of St Michael's Church, a grade II* listed building.
- 9.10 To see site Honi_12 in context we have indicated the approximate extent of site boundaries with red dots on the photograph below, which is taken from Roundball Hill. The photograph shows the site in red dots which indicate its elevated position above surrounding development and the marked extension into open countryside that development would result in. Below the site, in the photograph, is a band of mature trees that form a southern edge to the built form of Honiton. Development would breach the boundary these trees form.



- 9.11 It is not considered that the impact on these heritage assets and the national landscapes can be mitigated through changes to policy wording and the allocation is proposed for deletion.
- 9.12 Together with Honi_13 (recommended for deletion on heritage grounds) these allocations have a housing yield of 110 dwellings. Consideration has been given to whether this would constitute a significant change to the plan, the key factor in this case being whether the number of houses allocated can be incorporated into existing allocations around the town. In terms of the overall delivery of housing sites in Honiton, it is considered that this shortfall could be made up through an increase in the yield of two Honiton allocations on land south of Northcote Hill (GH/ED/39a & b). GH/ED/39a was allocated for 100 homes in the first Regulation 19 plan, but there is a resolution to grant planning permission for 115 dwellings.
- 9.13 **Officer recommendation is to delete sites Honi_07, Honi_12 and Honi_13 from the plan.**

Honi_18 – Land at Kings Road, Hale Close, Honiton

- 9.14 The site lies on the eastern side of Honiton, measures around 8 hectares in area and is allocated under Strategic Policy SD03: 'Honiton and its development allocations' for 136 homes. In consultation feedback there was a petition opposing the allocation that was signed by around 80 people. Committee identified that sites that received high levels of objection should be reassessed this site is brought back to committee for further consideration. Concerns raised in the petition are commented on below.

- 9.15 Road safety and access – Whilst noting initial objections to allocation from the highway authority, further technical work has been undertaken by the site promoter, and through liaison with National Highways and the Police means to overcome these concerns have been identified. These measures will include works to provide for safe site access and specifically will need to include introduction of a new speed limit, extending the existing 30 miles per hour limit, in a south easterly direction up the A35. The Police have confirmed no objection to this proposal, noting that the stepped reduction from national speed to 30 miles per hour is preferable to the current arrangement. We do not have objection from the highway authority on road capacity concerns, and a new speed limit offers potential to enhance road safety. Impacts on residents wellbeing - Almost any possible development site maybe challenged on this basis, and it's a difficult consideration to quantify. But compared to some allocations in the local plan the site has few adjoining neighbours, most of the site lies away from adjoining properties, and the existing A35 is significant in terms of existing urbanising impacts.
- 9.16 Environment and wildlife – Whilst many green field sites (and brownfield sites) may have some local wildlife interest there are no statutory designations at the site. Plus, with biodiversity net gain in place site development offers scope for overall net wildlife benefits. Heritage and visual impact – The Grade II listed Copper Castle (a former toll house) and the associated Copper Castle Gates lie to the south west of the site, Copper Castle on the opposite side of the A35. These are the only listed heritage assets in close proximity to the site. Any development of the site would need to be seen within the context of the intervening busy A35 road and the more general urban, 20th century development, on this side of Honiton. Potential for adverse impacts could be mitigated on account of the large site size with most of it some way to the east of these assets. The Blackdown Hills National Landscape abuts the southern site boundary but visually the site is seen within the context of existing built development, specifically along its western edges. The site does not protrude above any ridgelines and sits well below the dominant elevated land that lies to its south and rises above it.
- 9.17 Process for making the allocation – It is noted that the site was first identified for inclusion in the local plan, as an allocation, at the first stage of Regulation 19 consultation. Whilst it had not featured in earlier consultation documents as a recommended allocation, it is within the scope of plan-making practice to introduce new sites as the process progresses, including at Regulation 19 stage. This may be especially so as new evidence emerges. Even beyond the Regulation 19 stage of work, specifically including at Examination and under advice of planning inspector/s, new sites may be allocated in a plan. It is reiterated that a key reason for not initially identifying the site as an allocation in the plan was that a technical objection from National Highways had been received (highway access to the site is from the A35 trunk road), but this has now been addressed. Including the site in the Regulation 19 consultation has ensured that public consultation has been undertaken and the fact that a petition was circulated and signed demonstrates a public awareness of the site as a proposed allocation for development.

- 9.18 Overall the petition and other objections received through the consultation do not identify concerns to suggest that the site does not remain an appropriate allocation for inclusion in the Local Plan.
- 9.19 **Officer recommendation is to retain the allocation of Honi_18 - Land at Kings Road, Hale Close, Honiton.**

Alternative site options at Honiton

- 9.20 The officer recommended approach is to delete allocations at Honi_07, 12 and 13 and by way of addressing the shortfall increase the density of two other Honiton allocations to compensate for the number of dwellings lost. Allocations Honi_07, 12 and 13 have a combined capacity of 111 homes.

Recommended increase in allocation numbers at GH/ED/39b - Land south of Northcote Hill (south of railway) and GH/ED/39a (north of railway)

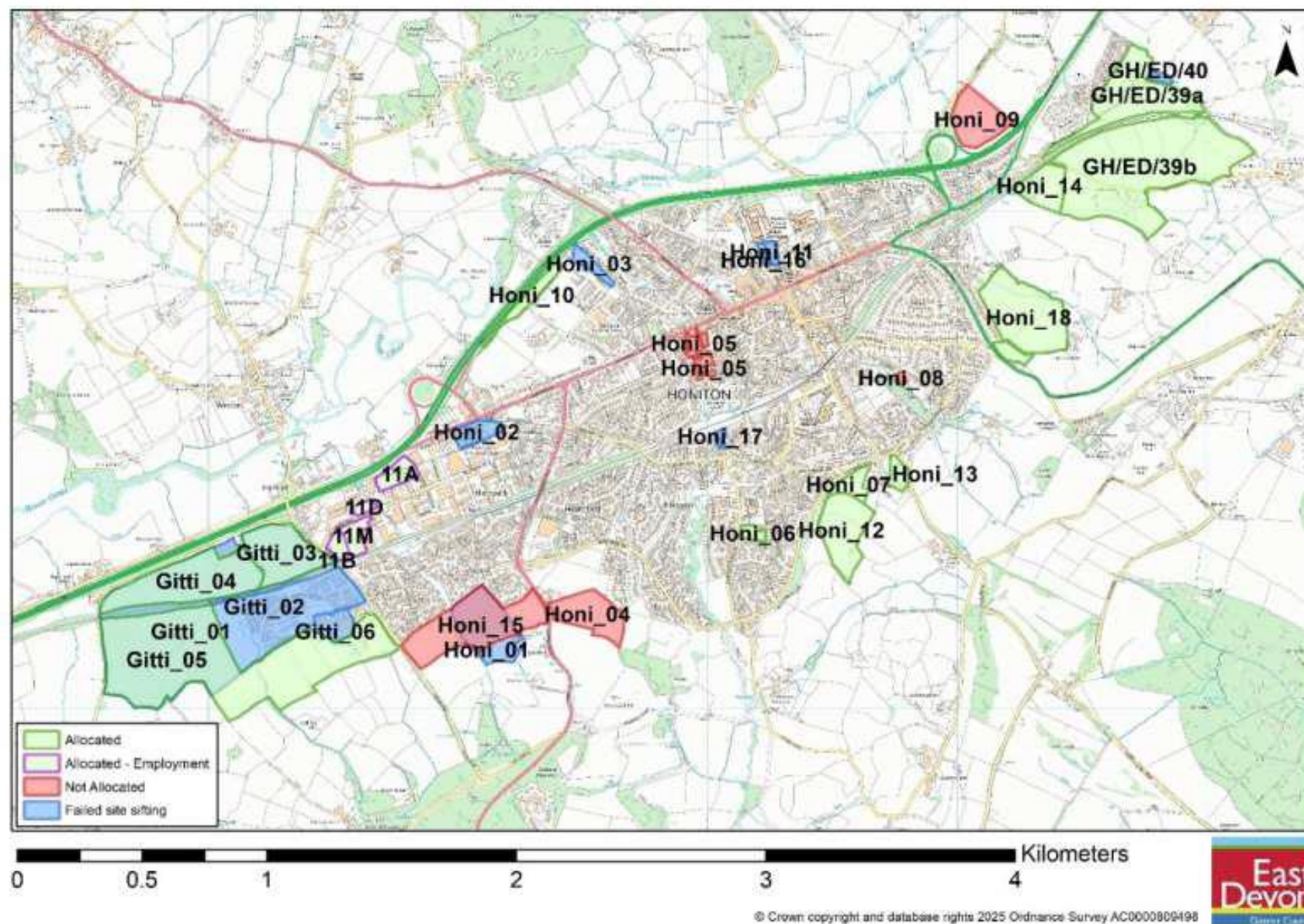
GH/ED/39b – Land south of Northcote Hill – south of the railway

- 9.21 GH/ED/39b was allocated for 100 homes in the first regulation 19 plan, but submissions on behalf of the developer make provision for up to 300 homes on this site. The original allocation for 100 new homes was a lower-level estimate and this was informed by concerns around adverse landscape impacts that may arise from development, especially if not well spaced and screened with vegetation extending up Northcott Hill towards the east, and noting proximity to the National Landscape. Another reason for the lower-level estimate was concern regarding the narrow access under the railway bridge, which may constrain safe and efficient movement to and from the site. Further work, however, indicates the potential to acceptably increase capacity in a reasonable landscape sensitive way, also the increase reflects Devon County Council's view that a larger development could help deliver improvements to walking, cycling and bus access, which are currently poor. They also advise that impacts on the Strategic Road Network are likely to be negligible. To make up for recommended lost allocations an allocation of 195 homes would appear a reasonable level, though we will look to see if this figure might be refined further (and increased) through ongoing landscape assessment which (with the additional 15 homes from GH/ED/39a) would compensate for not allocating the other sites.
- 9.22 Other sites at Honiton that could be allocated, albeit not recommended as such, as alternatives or in addition are:
- Honi_04 – 56 dwgs - Land lying to the North East of Heathfield Manor Farm
 - Honi_05 – 40 dwgs - Land to the north and south of King Street, including former Foundry Yard
 - Honi_08 – 6 dwgs - Land at the South Side of The Glenn Honiton
 - Honi_09 – 50 dwgs - Former Honiton Showground, Langford Road
 - Honi_15 – 133 dwgs - Land at Heathfield

See site assessment at:

[sal-027-honiton-site-selection-report.pdf](#)

Map of site options at Honiton – for assessment report see [sal-027-honiton-site-selection-report.pdf](https://www.exeter.gov.uk/media/14622/sal-027-honiton-site-selection-report.pdf)



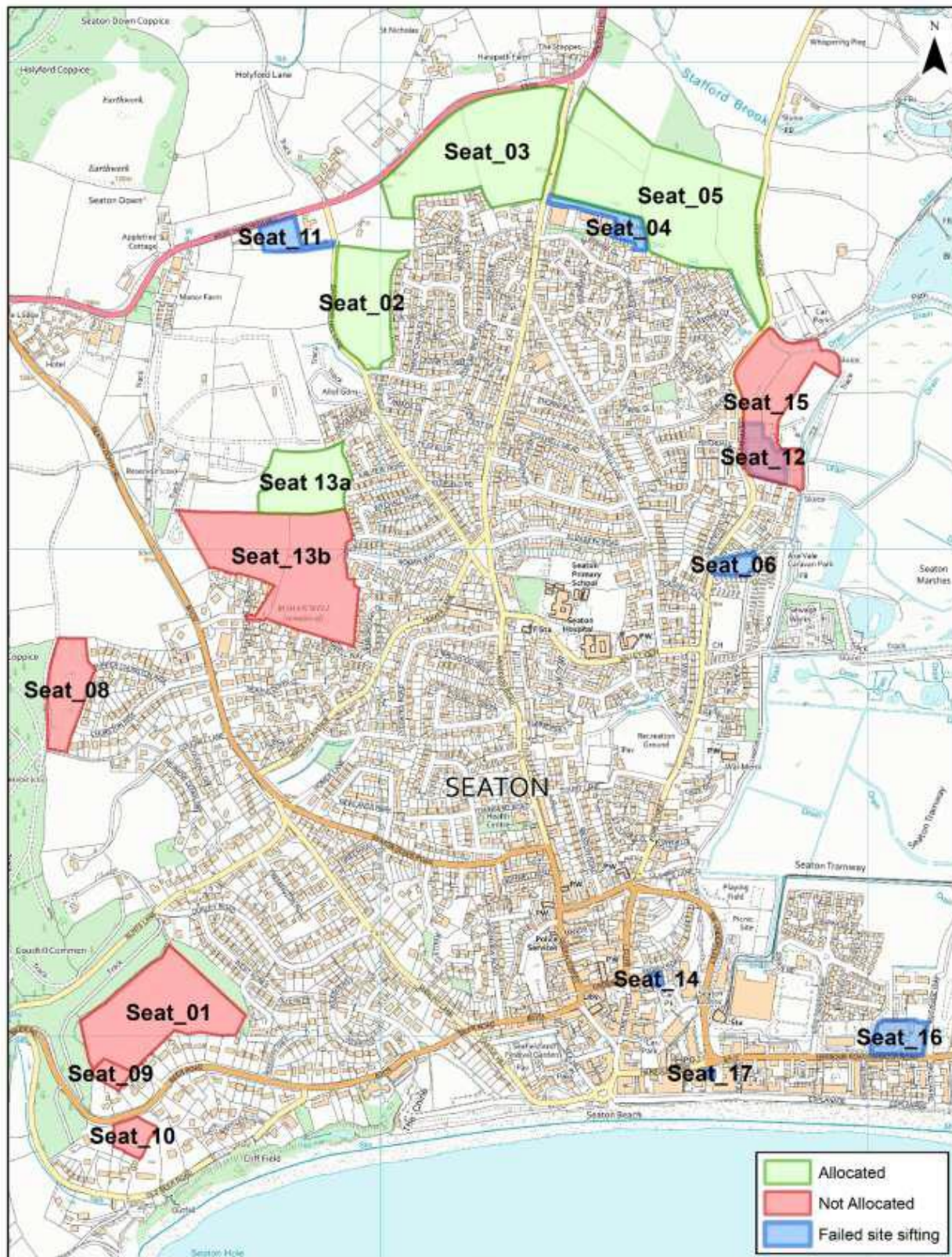
10 Site at Seaton

- 10.1 One site at Seaton has been identified for further assessment as referenced below. After the listed site there is a map showing its location. We identify alternative sites at Seaton that could be allocated for development should committee wish to make amendments.

Seat_13a - Land west of Axeview Road

- 10.2 Allocation of Seat_13a (a site owned by East Devon District Council) is consistent with the spatial strategy and the site has good access to facilities and employment, no on-site flood risk, and medium landscape sensitivity.
- 10.3 Devon County Council, however, objected to its allocation until further archaeological work undertaken. Historic England, in addition to archaeological objections, say there is a high risk of harming the significance of the adjacent 'Roman and earlier settlement at Honeyditches' Scheduled Monument
- 10.4 The land owner of the site, in this case East Devon District Council, has been approached requesting that they commission/produce assessment work in respect of archaeological interests.
- 10.5 Officer recommendation is that should archaeological work come back and set out a robust case to allow for development then the site Seat_13a should be allocated in the plan. If not then the allocation should be deleted.**

Map of site options at Seaton – for assessment report see [sal-039-seaton-site-selection-report.pdf](#)



0 0.1 0.2 0.4 0.6 0.8 Kilometers

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11 Sites at Feniton

- 11.1 Two sites at Feniton have been identified for further assessment and are referenced below. After the listed site there is a map showing their locations. We identify alternative sites at Feniton that could be allocated for development should committee wish to make amendments. All sites are referenced and assessed in the Feniton site report – see: [6g Feniton site selection report.pdf](#).

Feni_08 - Land adjacent to Beechwood

- 11.2 At the time that allocation was made the site was consistent with the spatial strategy, has good access to facilities in the village, no major adverse landscape, biodiversity or historic environment impacts.
- 11.3 Whilst there was prospective developer support for allocation there was strong opposition from residents and the parish council citing flooding, sewage, traffic, and sustainability.
- 11.4 The allocation site performed well in assessment terms (as did a number of possible site choices in Feniton), but it is noted that there is local opposition to proportionately high development levels at the village (as well as objections to this specific site). It is not regarded that policy amendments are appropriate in respect of matters raised in objections received. However, with the granting of permission at appeal for land at Colestock Road there is a basis of an argument that this appeal site (plus the allocation site Feni_05) meets the needs at Feniton and as such deletion of the allocation is appropriate. But it is suggested that such a deletion could be vulnerable to challenges based around how robust any site-specific concerns are about the allocation (as opposed to more strategic spatial strategy considerations).
- 11.5 In his appeal decision the inspector noted (para 14) that *“it is not disputed between the main parties that the proposed development would conflict with the adopted and emerging development plan policies relating to the Council’s spatial strategy and I have no basis to find otherwise.”* However, the inspector also set out (Para 15) that *“.... there is no certainty that the emerging allocations will become adopted, given that the second round of Regulation 19 consultation and the examination itself remains to be conducted”*.
- 11.6 The inspector went on to comment (para 18) that granting of approval of the appeal site plus existing local plan allocations and other commitments would provide for 206 dwellings at Feniton and this would be greater than for any other Tier 4 settlement. But, he nonetheless, and on his balance determined the appeal should be granted with specific reference made to the benefits of the development (see para 86 onward) that he identified – these specifically included *“boosting the supply of homes”* against a development shortfall and *“....the added benefit of 50% of the units being affordable dwellings*”.
- 11.7 From the inspector’s decision it is difficult to draw clear conclusions on whether he regarded the spatial strategy for Feniton as appropriate and therefore the quantum of growth that could be appropriate. Probably understandably he steered away from making a judgment on this issue other than to note the existence of the strategic

approach in the existing and emerging local plan and to conclude that granting of the appeal (noting some uncertainty around the emerging plan) was not unacceptable.

- 11.8 Committee may wish to consider the above matters in drawing conclusions on site Feni_08. However, from officer review we would suggest that when considered on a stand alone basis it performs acceptably well in assessment terms and that it is challenging to explicitly establish that if developed it would have an overtly marked and perverse strategic outcome in terms of distribution of development matters and therefore the overall plan strategy in light of the inspectors decision. On balance the officer recommendation is to not delete the allocation.
- 11.9 **Officer recommendation is to not delete Feni_08 from the plan.**

Otry_20 - Land to the south east of Bridge Cottages

- 11.10 Otry_20, on the eastern side of Feniton, was one of the few village employment sites allocated for development in the plan. There are a higher number of economically active residents in Feniton - around 75% - than elsewhere in the District but it has one of the lowest employment densities (0.28) meaning that there are nearly three times as many residents available to work than the number of jobs that are available locally. Feniton can therefore be described as a 'dormitory' settlement where most people have no choice but to commute to work elsewhere, making it in this respect a relatively unsustainable place to live. Employment development would be consistent with the spatial strategy - to increase settlement self-containment and meet the needs of the community - with no significant adverse development impacts..
- 11.11 Whilst this is a comparatively large site it was promoted for employment uses and as drafted policy has a phased approach to provide for what could well end up being longer term development. As an alternative, the development area could be reduced so that only phase 1, the northerly 2ha of the site is allocated, leaving the southerly section for a possible later allocation in a future plan.
- 11.12 The phased approach is considered preferable to allocating part of the site in this plan period and part in the next, as it allows for expansion within the plan period if there is a high take up rate and is likely to improve scheme viability. It will help to balance the overall amount of housing at Feniton with local employment opportunities. If the site were deleted in its entirety, without replacement, there could be some vulnerability to challenge, but this would not be expected to be as severe as might apply for housing site deletions. It should be noted that the site owner has **not** confirmed that the site remains available and as such there is some possible uncertainty over whether it will come forward.
- 11.13 There were no other sites promoted for employment uses at Feniton so a 'like for like' site swap would not appear credible. There may be an option of allocating an alternative housing site and seeking some employment provision on it, although this is unlikely to meet more than the immediate need generated by the housing, and won't balance the wider needs of the community/parish.

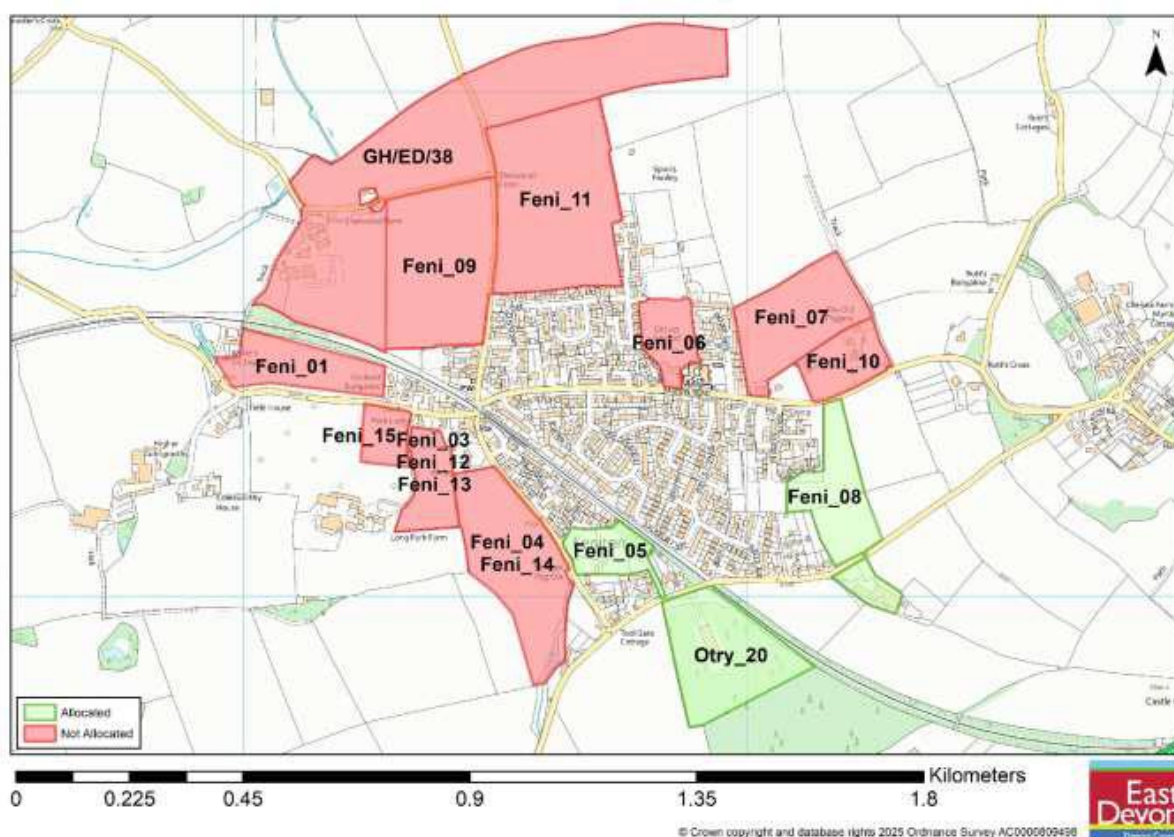
11.14 **Officer recommendation is to not delete Otry_20 from the plan.**

11.15 Noting officer comment about deletion, should committee wish to delete Feni_08 and replace provision with an alternative the following options exist albeit they are not recommended:

- Feni_01 – 42 dwgs
- Feni_06 – 30 dwgs
- Feni_07 – 60 dwgs
- GH/ED/38 – 150 dwgs
- Feni_10 – 36 dwgs
- Feni_13 – 25 dwgs
- Feni_14 – 75 dwgs
- Feni_15 – 30 dwgs

11.16 Note that part of GH/ED/38 gained approval at the Colestock Road appeal – therefore numbers for residual area have been adjusted downward. From earlier assessment.

Map of site options at Feniton – for assessment report see [sal-024-feniton-site-selection-report.pdf](#)



12 Site assessment at Whimble

- 12.1 Two sites at Whimble have been identified for further assessment and are referenced below. After the listed sites there is a map showing their locations. We identify alternative sites at Whimble that could be allocated for development should committee wish to make amendments albeit these are not recommended for allocation. All sites are referenced and assessed in the Whimble site report – [sal-047-whimble-site-selection-report.pdf](#).

Whim_08a - Land west of Bramley Gardens

- 12.2 Whim_08a is allocated for 50 homes and a community orchard in the local plan.
- 12.3 The site was allocated because development would be consistent with the spatial strategy of the plan with no major adverse effects.
- 12.4 Representation received on the plan highlighted:
- green wedge,
 - flood risk,
 - impact on wildlife,
 - lack of safe pedestrian access and procedural issues in allocation.
- 12.5 A draft level 2 strategic flood risk assessment (SFRA L2) shows that part of the site is at risk from fluvial, surface water and groundwater flooding. The flow path runs from east to northwest across the middle part of the site and in some scenarios up to 20% of the site is affected by flooding. The SFRA L2 states that a sequential test will be needed to justify the allocation, but an exception test will not be required as long as development is not proposed within flood zone 3. It is recommended that detailed flood modelling is undertaken (as part of any planning application) to assess the risk of flooding to the proposed development. The [Flood Risk Topic Paper](#) will be updated to support the next plan consultation.
- 12.6 Officer recommendation is to retain the allocation of Whim_08a - Land west of Bramley Gardens.**

Whim_11 - Land at Station Road

- 12.7 Whim_11 is allocated for 33 new homes in the plan.
- 12.8 The site was allocated because development would be consistent with the spatial strategy of the plan with relatively few constraints.
- 12.9 Concerns raised in consultation included:
- flood risk (including downstream),
 - impact on protected trees,
 - traffic and pedestrian safety and
 - Land of Local Importance designation.

12.10 Many sites in Whimble are at risk of flooding and this site was allocated following detailed work to understand the extent and nature of flood risk (see the [Flood Risk Topic Paper](#)). This shows that it is possible to develop the site for the number of dwellings allocated, although amendments to the policy wording are recommended in accordance with the Environment Agency comments. The site is well related to the existing village form. Although the intermittent nature of footpaths to facilities in the village centre is noted, this is a common issue with all development options in Whimble, and improvements are required through plan policy. Potential impacts on a nearby listed building are noted and improvements to policy wording are recommended to reflect comments from Historic England. The land is not designated as land of local importance in either the adopted or the emerging local plan.

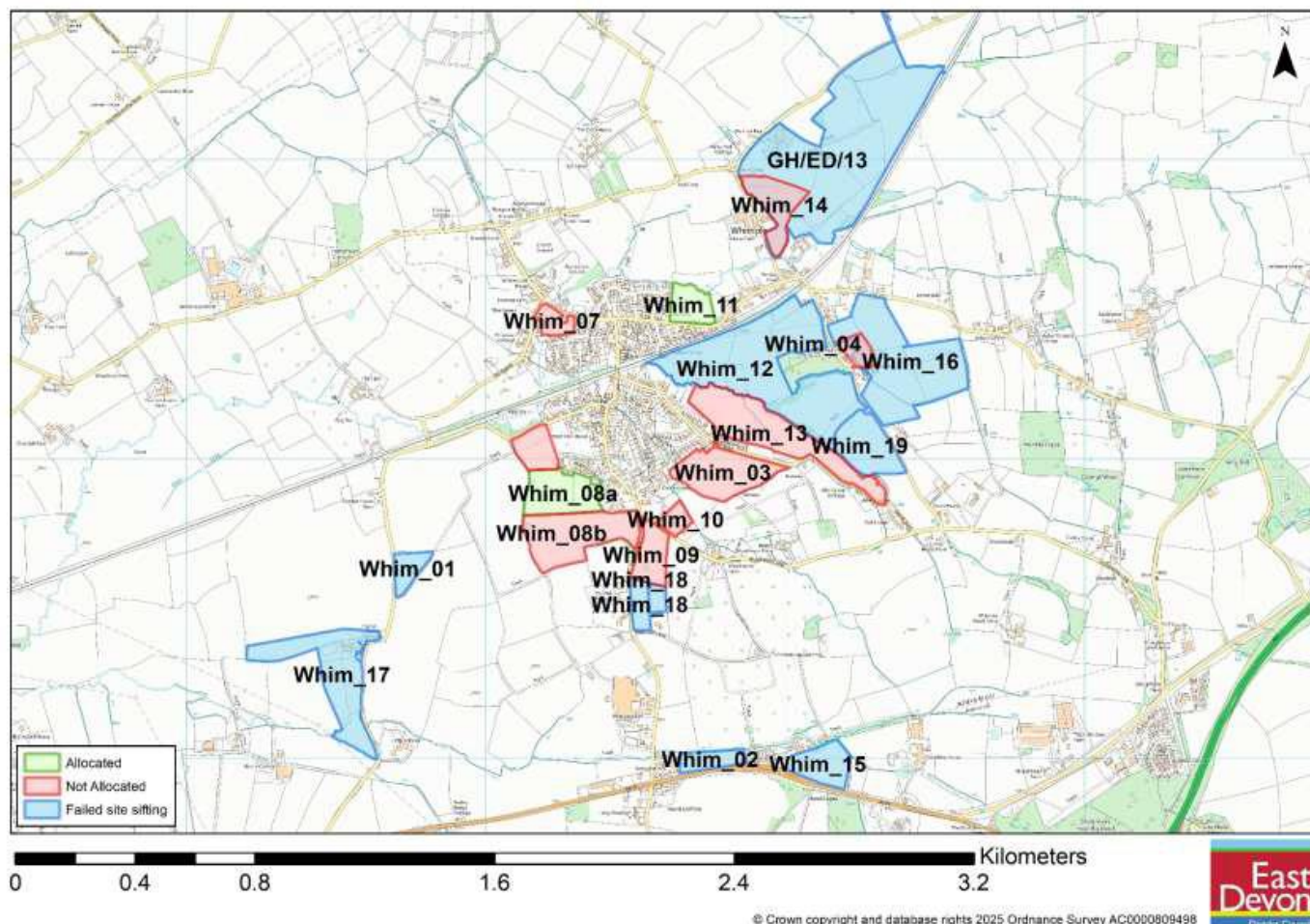
12.11 **Officer recommendation is to retain the allocation of Whim_11 - Land at Station Road.**

Alternative sites

12.12 Should committee wish to not allocate any of the housing sites at Whimble (in this schedule or otherwise in the plan) then the following options to address any housing shortfall arising are identified below but none of these sites are recommended by officers:

- Whim_03 – 72 dwgs
- Whim_04 – 21 dwgs
- Whim_07 – 10 dwgs
- Whim_08b – 120 dwgs
- Whim_09 – 45 dwgs
- Whim_10 – 17 dwgs
- Whim_13 – 108 dwgs
- Whim_14 – 46 dwgs

Map of site options at Whimble – See site assessment report at: [sal-047-whimble-site-selection-report.pdf](#)



Proposed redrafting of: Strategic Policy SD29: Whimble and its development allocations

The following changes in policy wording are proposed at Whimble to address consultee comments:

Strategic Policy: SD29: Development allocations at Whimble

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land at Station Road (Whim_11)

This site is proposed for 33 new homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be taken into account in any development proposals. Where development cannot be located outside of the area at risk of flooding (over the lifetime of development) an FRA will be required ~~There may be a need for a site specific flood risk assessment at this site to assess the risk of fluvial and surface water flooding and therefore to inform development proposals~~ so that no gardens or other domestic features are sited within the area of flood risk.

A line of trees to the site frontage and two trees within the field are subject to Tree Preservation Orders. These must be retained in development proposals.

Site layout should be planned to enable convenient east to west pedestrian and cycle links to the site frontage, but behind the existing hedge and protected trees. Development proposals should deliver a footway extension from the west and tie into the site. A

pedestrian access opposite the Withey should be provided if compatible with protection of trees and highway safety. Careful attention should be paid to conserving and enhancing the setting of Slewtown House, a Grade II listed building including through appropriate building heights, layout and landscaping. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land west of Bramley Gardens (Whim_08a) Update post SFRA 2

The site is allocated for 50 homes and a community orchard. The residential development element of the scheme should be located south of the existing Bramley Gardens development. Provision of an orchard, that could include open space provision associated with new housing, will be encouraged on land to the north of the new houses. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be taken into account in any development proposals. Where development cannot be located outside of the area at risk of flooding (over the lifetime of development) an FRA will be required to assess the risk of fluvial, surface water and groundwater flooding and therefore to inform development proposals so that no gardens or other domestic features are sited within the area of flood risk. Access would need to be off Bramley Gardens. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Prior to development, an archaeological investigation should be undertaken to understand the nature and extent of the structure noted in the Devon Historic Environment Record (HER no. MDV112700).

Reasoning behind policy changes to land at Station Road (Whim_11)

The existing policy wording already deals with issues relating to flooding, heritage, access and protected trees, but amendments/additions are proposed to reflect the comments of Historic England and the Environment Agency.

13 Employment allocation Clge_25a – next to Darts Farm

- 13.1 Development of this employment site would be consistent with the spatial strategy (enables expansion of existing business for specialist employment use), with no significant adverse sustainability effects
- 13.2 There were, however, concerns raised in representations from consultation in respect of:
 - Flood risk
 - Highways
 - Archaeology -DCC object on the basis that extent and importance of the subterranean archaeology need to be determined.
- 13.3 Highway capacity/access improvements may be required. The technical work is being undertaken and a masterplan will be submitted.
- 13.4 A draft level 2 strategic flood risk assessment (SFRA L2) shows that part of the site is at risk from surface water and groundwater flooding. The flow path runs from east to west across the site, with an additional branch of flooding flowing north, and in some scenarios up to 28% of the site is affected by flooding. The SFRA L2 states that a

sequential test will be needed to justify the allocation, but an exception test will not be required provided development is proposed outside of the areas at risk. It is recommended that development is placed outside of the areas at risk from surface water flooding, and a site-specific flood risk assessment is undertaken to assess the risk of surface water flooding in relation to the proposed development, using detailed modelling. The [Flood Risk Topic Paper](#) will be updated to support the next plan consultation.

- 13.5 Archaeological assessment work is understood to be ongoing for this site and at this stage no conclusions have been reached.
- 13.6 **Officer recommendation is to wait for further information before drawing conclusions on the potential allocations of this site.**

Financial implications:

There are no direct financial implications identified within the report. (AB/19/08/2025)

Legal implications:

The legal implications are covered in this report (002533/20 August 2025/DH)