

Boyer

Land at St Johns – EXMO_20

EDDC Regulation 19 Consultation Stage 2
Representations

REPORT CONTROL

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TABLE OF CONTENTS

1. Introduction	4
2. Objectives and Strategic Policies	7
3. Site Allocation: Land at St Johns, Exmouth (EXMO_20)	17

APPENDICES

Appendix 1. Vision document

1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of 3West Developments, in response to the East Devon District Council (EDDC) Local Plan (Regulation 19, stage 2) Consultation Document (hereafter referred to as the “Draft LP”).
- 1.2 3West Developments have positively engaged in past Local Plan consultations, with representations for Land at St Johns (‘the Site’) previously been submitted by Collier Planning as part of the first stage of the Regulation 19 Consultation undertaken in March 2025.
- 1.3 This second stage of the Regulation 19 consultation uses a 'tracked changes' document, highlighting differences from the first version; these representations focus on the changes and thus should be read alongside the Phase 1 submissions made in March 2025.

Land at St Johns (Exmo_20)

- 1.4 Land at St Johns is located north-west of Exmouth, which extends to approximately 85.46 hectares. The Site is sustainably located and has capacity for up to 700 high quality homes, offering a Site that can significantly benefit the Council in terms of housing land supply.
- 1.5 The site is identified as a draft allocation within East Devon’s Regulation 19 Consultation Document (Exmo_20), to accommodate:
 - Social and community facilities;
 - Around 700 new homes; and
 - At least 2 hectares of employment land.
- 1.6 3West Developments wholly supports the allocation of Land at St Johns (Exmo_20) as set out in the Regulation 19 Publication Draft and can confirm that the site is suitable, available and deliverable.
- 1.7 The Site represents a highly sustainable, landscape-led opportunity on the edge of Exmouth to create a distinctive contemporary ‘woodland village’. The proposals are founded on a masterplan that works with existing topography, woodlands and hedgerows to deliver a well-connected, walkable neighbourhood focused on a strong community core, generous green infrastructure and excellent active travel links. The development will provide a well-integrated, self-contained extension to the town that promotes healthy lifestyles, a sense of belonging and a positive transition between the urban area and the surrounding landscape. A Site Location Plan is included within Appendix 1 of these representations.

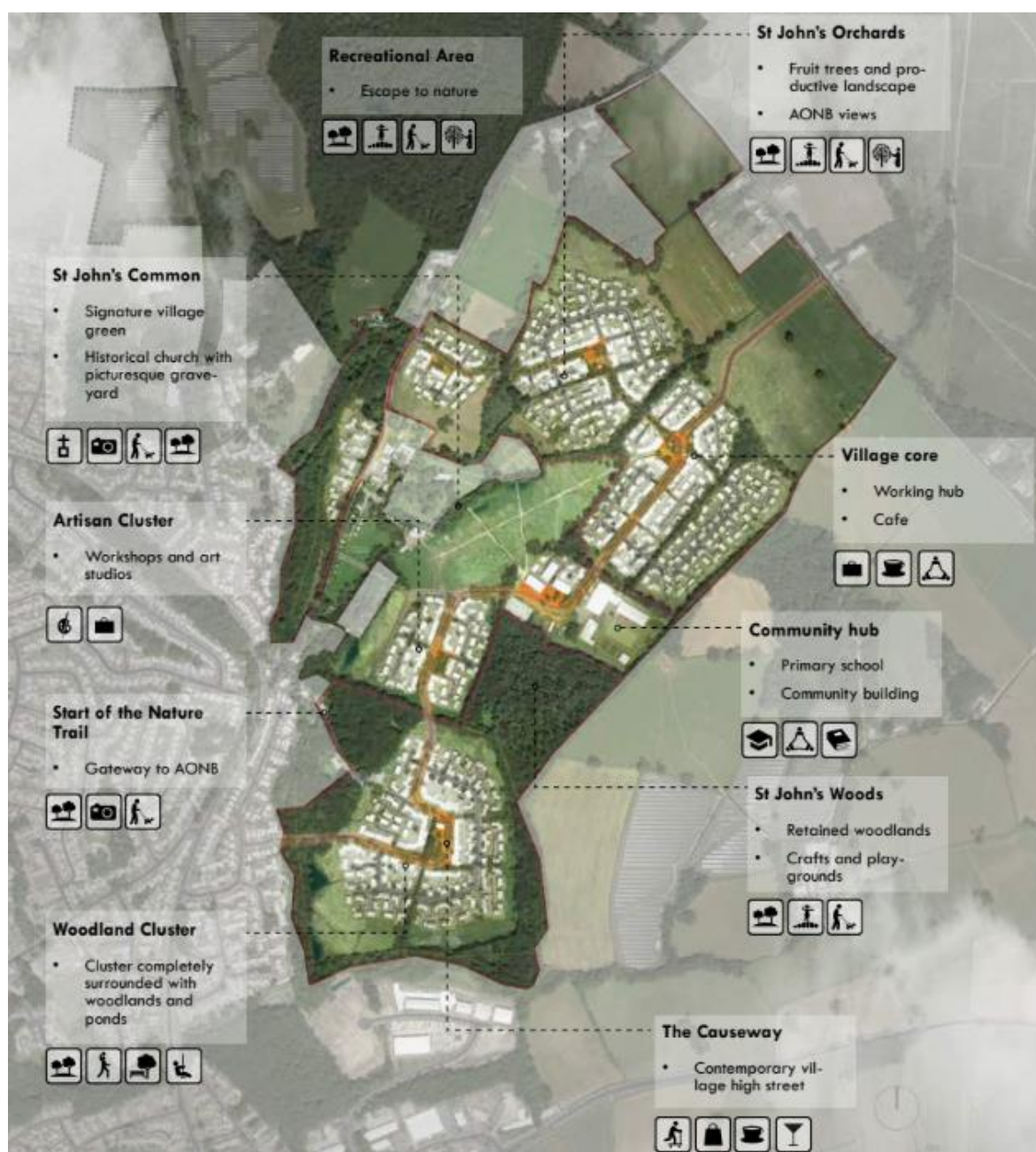


Figure 1.1 Illustrative Masterplan

Test of Soundness

- 1.8 These representations respond to the relevant Draft Local Plan policies, having regard to the tests of soundness set out in the National Planning Policy Framework (NPPF, December 2023). For the avoidance of doubt, these tests apply in the context of the Draft Local Plan benefitting from the NPPF transitional arrangements. In this regard, the Plan must be:
- Positively prepared;
 - Justified;
 - Effective; and

- d. Consistent with national policy.

2. OBJECTIVES AND STRATEGIC POLICIES

2.1 This Chapter discusses the Strategic Policies in chronological order.

Policy SP01: Spatial Strategy

2.2 Strategic Policy SP01 confirms that new development will be directed towards the most sustainable locations in East Devon, with the most sustainable location identified as the West End of the District, followed by the Principal Centre of Exmouth and the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton and Sidmouth.

2.3 3West support the identification of Exmouth as a Principal Centre. This appropriately recognises that Exmouth is the largest town in East Devon and provides the greatest concentration and range of services, facilities and employment opportunities within the district. It is appropriate and entirely justified therefore that the plan identifies Exmouth as a higher tier settlement than the other towns.

2.4 We also support the overall settlement hierarchy set out within Strategic Policy SP01 and agree that it accords with a fundamental principle of the National Planning Policy Framework (2023), namely directing housing growth towards the most sustainable locations.

2.5 However, 3West are disappointed to see a continued lack of any meaningful uplift in housing provision directed towards Exmouth. At only approximately 11% of the overall housing requirement, the level of growth apportioned to Exmouth is lower than might reasonably be expected for the district's largest and most sustainable settlement. This is particularly the case when Exmouth's role, accessibility and service provision are considered in the context of the spatial strategy as a whole.

2.6 We note the addition of the following text to the policy justification:

'In the event of housing not being delivered in accordance with the plan and/or the identified need for new homes changing in the future, including taking account of possible unmet needs in neighbouring areas, the requirements of national policy and legislation for a review/update of the plan will be followed.'

2.7 Whilst acknowledgement of the need for future review is supported, this recognition would have been more meaningful if accompanied by a greater uplift in housing provision directed to a settlement which is already identified as highly sustainable and well suited to accommodating additional growth.

Policy SP02: Levels of future housing development

2.8 3West reiterate comments made in previous representations in respect of Strategic Policy SP02 and remain disappointed that the concerns raised at the earlier Regulation 19 stage have not been substantively addressed.

2.9 In particular, the approach taken continues to rely on constrained housing provision, which reflects a housing requirement of 80% of the actual local housing need for the District, despite East Devon experiencing an acute housing crisis and worsening housing affordability.

- 2.10 3West also object to the Council's intention to proceed with a stepped trajectory approach, which is wholly unjustified, noting the District's significant overreliance on housing delivery within the new settlement, despite the acknowledged uncertainty surrounding future housing need and delivery on such strategic sites, highlighted through the historic issues associated with Cranbrook. This risks undermining the Plan's ability to respond positively and flexibly to changing circumstances, contrary to national policy. EDDC are also experiencing a housing crisis and an acute affordable housing need rendering the need to address their housing requirement as soon as possible, rather than delaying delivery by adopting a stepped trajectory approach.
- 2.11 Given Exmouth's position within the settlement hierarchy, a more ambitious approach to housing provision within the town would assist in ensuring the Plan is positively prepared and effective over the plan period.

Policy SP03: Housing requirement by Designated Neighbourhood Area

- 2.12 3West raise no objection in principle to Policy SP03 and welcome the increase in the Exmouth DNA housing requirement from 2,311 to 2,331 dwellings. However, 3West Developments consider that further clarity is required regarding how this requirement is expected to be met over the plan period, having regard to existing commitments and the role of any future Neighbourhood Development Plan.
- 2.13 In particular, whilst Policy SP03 identifies a housing requirement of 2,331 dwellings for the Exmouth DNA, the allocations listed under Policy SD01 provide for 1,455 dwellings. It is therefore unclear whether this figure includes extant commitments and/or whether the Council anticipates an uplift to accommodate additional growth through the emerging Exmouth Neighbourhood Development Plan. The relationship between these figures, and the reliance upon them for meeting the Draft LP housing requirement, must be clarified to ensure consistency and certainty across the Draft Local Plan.

Policy SP04: Employment provision and distribution strategy

- 2.14 We note that Policy SP04 has been amended since previous consultation stages to provide further explanation as to why the proposed employment land provision exceeds the requirements identified within the Employment Development Needs Assessment (EDNA). In particular, the Council now seeks to justify this approach on the basis of addressing historic under-provision, and 3West Developments acknowledge that this amendment appears intended to respond to concerns raised in earlier representations.
- 2.15 We also reiterate our previous concern in relation to the proposed approach of meeting a proportion of Use Class E(g)(iii) light industrial needs through allocations associated with larger housing developments. The Plan has still failed to demonstrate that such locations are suitable for accommodating light industrial uses, nor has it been shown that this approach would be effective in meeting the operational requirements of such businesses. There is therefore a lack of proportionate evidence to justify this approach. In the absence of evidence on market demand, deliverability, compatibility with residential uses, and long-term viability, it has not been demonstrated that this strategy will deliver employment land and premises in the right locations over the plan period.

- 2.16 For these reasons, whilst the amendments to Policy SP04 are noted, they do not adequately address the concerns raised in previous representations. The policy remains insufficiently justified and it has not been demonstrated that it represents an effective or evidence-led approach to meeting employment needs. As currently drafted, Strategic Policy SP04 is therefore not considered sound, particularly in respect of the tests of being justified and effective.

Policy SP05: Development inside Settlement Boundaries

- 2.17 Whilst 3West Developments agree with the principle of this policy, 3West Developments object to the current policy wording, which appears to restrict and discourage Neighbourhood Plans from allocating sites beyond settlement boundaries.
- 2.18 The housing numbers within the Council's strategic policies and housing distribution should not represent a ceiling for growth. Neighbourhood Plans must be in general conformity with the strategic policies of the development plan in force (in order to meet the basic conditions).
- 2.19 Should updated evidence be prepared in support of a future Neighbourhood Plan that suggests that there is a local unmet need for additional housing (beyond that identified within the adopted LP), the Council should not prevent additional sites from being allocated within the Neighbourhood Plan.
- 2.20 As currently worded, therefore, it is considered that this Strategic Policy is not sound as it does not align with National Policy and the Government's overarching objective of significantly boosting the supply of homes (NPPF; Paragraph 61).

Policy SP06: Development beyond Settlement Boundaries

- 2.21 Strategic Policy SP06 states that in locations outside of the defined settlement boundaries, development will not be permitted unless it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development.
- 2.22 While 3West Developments support this policy, 3West Developments consider that there is an inconsistency with Strategic Policy SP05, which appears to discourage Neighbourhood Plans from allocating sites outside of the Draft LP settlement boundaries. It should be acknowledged that Neighbourhood Plans can make alterations to the settlement boundaries to allow for additional housing growth where this is justified and accords with the Council's overarching spatial strategy, therefore meeting the NDP Basic Conditions Tests.

Policy SD01: Exmouth and its development allocation

- 2.23 3West Developments note the changes made to Policy SD01 since previous consultation stages and welcome the additional clarity provided in respect of heritage, biodiversity, minerals safeguarding and access considerations. The majority of these amendments reflect matters already addressed, or capable of being addressed, through the St. Johns Vision Statement and Addendum submitted previously and therefore do not undermine the suitability or deliverability of the allocation.
- 2.24 3West Developments are committed to the delivery of this site and can confirm that the draft allocation is deliverable.

Heritage

- 2.25 3West Developments note the strengthened requirement for a detailed heritage assessment, explicitly referencing St John in the Wilderness church, and the establishment of an 'extensive' area around the church within which built development will not be permitted.
- 2.26 3West, however, consider that it is unnecessary for the word 'extensive area' to be included within the draft policy and recommend that this is omitted to ensure the policy is sound. The area of land to be kept free from development should be informed by the detailed heritage assessment required by this policy. An area of land has been kept free from development around the church as indicated within the Vision Statement and Addendum, which has been informed by the Site's technical assessment and demonstrates how development can be concentrated in the southern parts of the site while preserving the setting and significance of the church. The allowance for open space (non-sports pitch uses) within this area, subject to no adverse heritage impacts, is welcomed and will assist in achieving high-quality placemaking.

Minerals Safeguarding

- 2.27 3West Developments acknowledge that the northern parts of the site fall within a Mineral Safeguarding Area and a wider Mineral Consultation Area as defined in the Devon Minerals Plan. 3West Developments note the requirement for a Mineral Resource Assessment and, where appropriate, prior extraction. While the importance of safeguarding mineral resources is recognised, it is considered important that these requirements are applied in a proportionate and pragmatic manner, reflecting the likelihood of extraction being economically viable and deliverable within the plan period. Early engagement with the Mineral Planning Authority, as recommended by the policy, will be undertaken to ensure that mineral considerations do not unnecessarily constrain or delay development. The policy also indicates that development in the Mineral Consultation Area must be designed in a way to not constrain any future mineral working. 3West Developments disagree with this rigid approach and consider rather, should discussions with the Minerals Authority confirm that this area is not suitable for mineral working, then the area should not be sterilised from development. This should be reflected within the policy wording and flexibility introduced accordingly.

Access Through Safeguarded Area

- 2.28 The explicit exception allowing for the provision of an access road and associated footway/cycleway through the safeguarded area, subject to sensitive design is also welcomed. This reflects the essential role of this infrastructure in delivering the site and supports sustainable transport objectives. 3West Developments can confirm that this is reflected within the current concept masterplan.

Tree and Hedgerow Retention

- 2.29 The Policy requires existing hedges and trees within the site to be retained and reinforced with additional planting and habitat creation. 3West Developments are developing a scheme that will seek to meet this policy objective, however, strongly consider that the policy should be reworded to state 'where possible'. There must be acknowledgement within the policy wording that there may be instances where hedges and/or trees are required to be removed to allow

for a suitable scheme to be delivered, and any loss must be considered in the overall planning balance.

Policy CC02: Net-zero carbon development

- 2.30 3West support East Devon District Council's ambition to achieve carbon neutrality by 2040 and recognise the important role that new development, including the Exmo_20 allocation, can play in contributing towards this objective. The promotion of sustainable development and reductions in operational carbon emissions is supported in principle.
- 2.31 However, it is important that the policy framework for the Exmo_20 site appropriately reflects the role of national standards, in particular the forthcoming Future Homes Standard (FHS), which will largely determine the sustainability and energy efficiency requirements applied to new homes across England. The implementation of the FHS will make a significant contribution towards reducing carbon emissions from residential development and will therefore support the Council's carbon neutrality objectives.
- 2.32 In this context, any policy requirements for the Exmo_20 site that go beyond current future Building Regulations must be clearly justified and supported by robust evidence, including proportionate viability assumptions and assessment. At present, such proportionate evidence has not been provided. Without such justification, there is a risk that additional or overly prescriptive requirements could undermine the viability and deliverability of this strategically important allocation.
- 2.33 Whilst the objective of achieving low-carbon or net-zero development is supported, it remains essential that sufficient flexibility is built into the policy to respond to evolving national standards, technological change and site-specific constraints. This is particularly important given the range of other policy requirements affecting the site, including heritage, biodiversity, mineral safeguarding, access and infrastructure provision.
- 2.34 In light of the above, 3West Developments considers that the draft policy as currently worded is not sound, as it is not justified (in the absence of proportionate evidence and viability testing) and not effective (given the potential implications for the deliverability of the Exmo_20 allocation).

Strategic Policy AR01: Flooding

- 2.35 3West object to the following criteria within this policy on the grounds that they are ineffective and therefore unsound. 3West is disappointed that the drafting of this policy has not been amended in response to a number of comments raised by respondents during the Phase 1 consultation, notwithstanding the concerns that were clearly expressed regarding its clarity, alignment with national policy, and practical implementation. Against this background, 3West maintains its objection to specific elements of the policy as set out below.
- 2.36 Criterion a) requires development proposed in areas at risk of flooding from any source to demonstrate that no sequentially preferable alternative site exists. While it is recognised that the Draft Local Plan may be examined against the 2023 NPPF, planning applications will be assessed against the most up-to-date NPPF and NPPG. In relation to the Sequential Test, this is only required where built development, land raising, access and egress, or internal road

layouts are located within areas of flood risk from any source. The Sequential Test is not required where only public open space is proposed within areas at risk of flooding. Greater clarity is therefore needed to avoid ambiguity for decision-makers and to ensure the policy is effective and sound.

- 2.37 Criterion c) requires development sites to provide space for SuDS designed to reduce the volume and rate of surface water runoff to below greenfield rates, in accordance with the Sustainable Drainage Systems – Guidance for Devon, and to manage runoff as close to source as possible. However, Devon County Council guidance confirms that developments are not required to achieve runoff rates lower than greenfield levels.
- 2.38 3West Developments therefore consider that the policy is unsound as currently worded, as in its current form it is not justified and is not supported by proportionate or robust evidence.

Strategic Policy HN01: Housing to address needs

- 2.39 We support the overall intent of Strategic Policy HN01 and acknowledge the importance of ensuring that new housing development responds to identified local needs. We also welcome the policy's recognition that the most up-to-date local housing needs evidence can be taken into account when assessing both current and future requirements.
- 2.40 In this context, we consider that the Plan should make provision for housing allocations that meet 100% of East Devon's identified housing needs, rather than limiting delivery to 80%.
- 2.41 Furthermore, we consider that locally derived market evidence and sales data, which form an important component of housing needs evidence, should be recognised within the broader assessment framework. Such information can provide valuable, site-specific insight and supplement district-wide evidence when determining appropriate levels of housing provision.

Strategic Policy HN02: Affordable housing

- 2.42 3West Developments support the principle of Strategic Policy HN02 and the provision of affordable housing to assist the Council in meeting and addressing housing need and worsening the affordability gap within EDDC.
- 2.43 Policy HN02 states that sites within Exmouth, must provide 30% affordable housing. In accordance with this, Land at St Johns is proposed to deliver 30% affordable housing which will assist the Council in meeting their affordable housing needs.
- 2.44 It is maintained that ensuring a balance between the delivery of affordable housing as well as other objectives such as design, sustainability and infrastructure requirements is crucial. 3West Developments therefore reiterate our previous concerns regarding the evidence base underpinning affordable housing requirements and the need to ensure that policy expectations remain realistic, deliverable and flexible, when considered alongside other policy burdens.
- 2.45 Furthermore, whilst 3West Developments recognise amendments to the wording, there remains a concern that the policy does not allow for sufficient flexibility nor recognise market variance within the breakdown of affordable housing tenures and mix. Paragraph 86(d) of the NPPF (2023) which states that planning policies should *"be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-*

work accommodation), and to enable a rapid response to changes in economic circumstances.”

2.46 To be considered effective and sound, 3West suggest the policy wording be amended to:

- Include additional flexibility, with the use of local market information to inform the appropriate tenure breakdown, beyond what is set out within the District wide housing needs assessment.
- Ensure the policy considers affordable housing mix on a case-by-case basis.
- Allow alternative housing mixes where necessary.
- Allow developers to depart from the proposed affordable housing mix should sufficient market evidence be provided, particularly if the proposed development provides the required affordable housing percentage required.

Strategic Policy HN03: Housing to meet the needs of older people

2.47 3West recognise that there is an increased demand for adaptable dwellings due to the ageing population. Notwithstanding this, viability and site location must be factored into policy requirements, given that not all sites would be appropriate to accommodate such provision.

2.48 The current policy wording states that “*schemes for 200 or more dwellings should include at least 10% as on-site as specialist older persons dwellings as either C3 dwellings and/or C2 equivalents*”.

2.49 It is considered that the policy, as currently worded, is neither effective nor justified, as it fails to recognise the specific locational requirements of specialist housing, such as proximity to town centres and access to public transport. As currently drafted, it risks requiring such accommodation on sites where it would be unsuitable, thus meaning the policy is unsound. The wording should be amended to clarify that older persons’ housing will only be required where supported by an up-to-date evidence base, demonstrable market demand, and where delivery is viable.

2.50 The policy should also explicitly address market demand for older persons’ housing and confirm that, where no such demand exists, the units should revert to general market housing.

Policy HN04: Accessible and Adaptable Housing

2.51 3West Developments recognises the increasing demand for accessible and adaptable homes and supports the overall objectives of Strategic Policy HN04. The reduction in the proportion of new dwellings required to meet Building Regulations M4(2) or higher from 100% to 50% is welcomed, as it provides a more balanced and deliverable approach. It should be noted by the LPA that this will place increased cost and issue on development layouts and viability.

2.52 However, the Draft Local Plan also proposes to increase the proportion of new affordable homes required to meet Building Regulations M4(3) (2)(a) or (b) from 5% to 15%. 3West Developments has significant concerns shares the concerns raised by the Home Builders Federation, and considers that, when combined with the continued requirement for 50% of all

dwellings to meet M4(2) standards, the policy would have a substantial impact on development viability.

- 2.53 National policy is clear that Local Plan policies must be realistic, proportionate and deliverable when considered cumulatively. Evidence published by the Home Builders Federation demonstrates that M4(3) requirements can result in significant cost increases, reduced layout efficiency and greater design constraints, particularly on sites with level changes, complex topography or higher infrastructure demands. These impacts are exacerbated when combined with a requirement for 50% of all dwellings to meet M4(2) standards.
- 2.54 Accordingly, 3West Developments considers that the proposed uplift to 15% M4(3) affordable housing is not sufficiently justified and risks undermining the effective delivery of strategic allocations.

Policy HN05: Self-build and custom build housing

- 2.55 3West supports the overarching principle of Strategic Policy HN05, however, considers that allocating specific sites for self-build and custom-build housing would be more effective than applying blanket requirements to all allocated sites. A more flexible, criteria-led approach would be better suited to facilitating delivery.
- 2.56 We question whether the requirement for self-build and custom-build housing on all developments of more than 20 dwellings is sufficiently justified. Where there is no demonstrable demand, developers should not be disadvantaged by being required to deliver specialist housing products.
- 2.57 To ensure the policy is justified and therefore sound, the wording should be amended to clarify that self-build and custom-build housing will only be sought on developments where there is clear evidence of market demand. In the absence of such demand, it should be recognised that these units should revert to conventional market housing to meet local needs.

Policy DS01: Design and Local Distinctiveness

- 2.58 3West Developments support the requirements of the policy which ensure proposals respond to local policy and guidance, and to be of high quality and locally distinctive.
- 2.59 Land at St Johns, north-west of Exmouth, presents an opportunity to deliver up to 700 high-quality homes. The development would respond positively to its surroundings, meeting local housing needs through a mix of private and affordable homes, alongside new social and community facilities.

Policy DS02: Housing Density and Efficient Use of Land

- 2.60 3West support the principle of Policy DS02 and agree that residential development should optimise density in a manner that conserves or enhances the character of the area and makes efficient use of the land.
- 2.61 However, the policy as drafted lacks certainty and risks unnecessary duplication. In particular, the relationship between the requirement for design codes under Policy DS02 and the

requirement for a comprehensive masterplan for St John's under Strategic Policy SD01 must be clearly defined. Both matters address overlapping issues.

- 2.62 To ensure the policy is effective and consistent with the tests of soundness, Policy DS02 should be amended to explicitly confirm that the comprehensive masterplan required under Strategic Policy SD01 will satisfy any design code expectations for the site, and that additional design code requirements will not be imposed where these matters have already been addressed. This certainty is essential to support deliverability and avoid delay.

Strategic Policy PB05: Biodiversity Net Gain

- 2.63 3West acknowledges the amendments made to Strategic Policy PB05 and supports the principle that impacts on biodiversity should be avoided wherever possible, mitigated where necessary, and fully compensated where residual impacts remain. The importance of delivering biodiversity enhancements as part of new development, including at Exmo_20, is fully recognised.
- 2.64 However, notwithstanding the amendments, 3West Developments continue to consider the requirement for biodiversity net gain in excess of the statutory minimum is not sound. For the Local Plan to be considered sound, it must be consistent with national policy. The mandatory requirement for major development, as set out in the Town and Country Planning Act 1990 (as amended by the Environment Act 2022), is a minimum of 10% biodiversity net gain. Any requirement to exceed this threshold must therefore be clearly justified, evidenced and shown to be deliverable.
- 2.65 This position is reinforced by emerging national policy, including the draft NPPF consultation (2025), which confirms that development plans should only set biodiversity net gain requirements above the statutory minimum in specific circumstances, where this is fully justified and demonstrably deliverable. Similarly, national Planning Practice Guidance is clear that higher BNG requirements should not be applied on an area-wide or allocation-specific basis unless supported by robust evidence, including consideration of local need, opportunity and impacts on development viability.
- 2.66 In the absence of such justification, the application of a 20% biodiversity net gain requirement to major development would not be consistent with national policy and risks undermining the viability and deliverability of allocated sites, including Exmo_20. Given the range of other site-specific constraints and policy requirements already affecting the allocation, it is particularly important that biodiversity requirements are applied in a proportionate and flexible manner.
- 2.67 Accordingly, to ensure consistency with national policy and support the effective delivery of the St John's allocation, biodiversity net gain requirements should align with the statutory minimum of 10%, with any consideration of higher levels assessed on a site-specific and evidence-led basis through the development management process.

Policy OS02: Sport, Recreation and Open Space Provision in Association with Development

- 2.68 3West Developments support Policy OS02 and welcomes the updated wording which recognises that site topography and other planning constraints may limit the extent to which open space and recreational provision can be delivered on-site. This flexibility is appropriate

and ensures that the policy can be applied in a pragmatic manner without undermining the viability or deliverability of allocated sites, including Exmo_20.

- 2.69 The development of land at St John's, Exmouth will provide significant opportunities for sport, recreation and public open space in accordance with Policy OS02. As set out within the Vision Statement and Addendum, the scheme will deliver a substantial quantum of publicly accessible open space, including landscaped green infrastructure, woodland retention and enhancement, informal recreation areas, and opportunities for children's play.

3. SITE ALLOCATION: LAND AT ST JOHNS, EXMOUTH (EXMO_20)

Introduction

- 3.1 The site allocated in the Regulation 19 Draft Plan is as follows:

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 uses will be permitted.

Northern parts of the allocated site fall in a Mineral Safeguarding Area (for sand and gravel resources) and associated larger Mineral Consultation Area as defined in the Devon County Council's Minerals 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 Mineral 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 footway/cycleway that link built development at the site 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. The Devon Minerals Plan seeks to ensure that sufficient and appropriate amounts and types of minerals are safeguarded and can be extracted, should demand arise and extraction is commercially and technically viable, to meet future needs. The role of Mineral Safeguarding Areas and larger Mineral Consultation Areas is to ensure that non-mineral development does not sterilise or constrain future mineral extraction. All proposals should be brought forward in consultation with the Mineral Planning Authority.

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 homes and other development that would result in unacceptable impacts will not be permitted within 400 metres of the Pebblebed Heaths. A natural buffer should be retained in the northeast of the site, along the B3179, to conserve foraging areas for nightjars opportunities for BNG and to maintain visual amenity adjacent to the East Devon National Landscape. Any car parking near to the SAC/SPA should be for uses that do not support recreational access to the SAC/SPA. 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. If delivered onsite the SANGs should be as tightly integrated as possible to residential development in terms of location and access. Any onsite SANG should be buffered, fenced and have restricted onwads access towards the SAC / SPA.

Existing hedges and trees within the site should be retained and reinforced with additional planting and habitat creation, including heathland on higher land at the northeastern end of the site as landscape enhancement.

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.

- 3.2 3West Developments remain supportive of the allocation and are fully committed to delivering the policy as drafted. 3West can confirm that the site is suitable, available, and deliverable. The company is actively progressing ongoing technical work, including the preparation of technical reports and will be progressing pre-application and consultation. 3West Developments is located approximately 5 miles from the site and is fully committed to the site's deliverability. However, we propose a small number of text amendments to ensure the policy operates effectively in practice:
- The policy wording should explicitly recognise that there may be circumstances where the removal of hedges and/or trees is necessary to enable an appropriate and viable scheme to come forward, and that any such loss should be weighed within the overall planning balance.
 - The policy currently requires that development within the Mineral Consultation Area must be designed so as not to constrain any potential future mineral extraction. 3West Developments consider this to be overly restrictive. Instead, where discussions with the Minerals Authority conclude that the area is not suitable for mineral working, it should not be unnecessarily sterilised from development. The policy should be amended to reflect this position and provide greater flexibility.
 - In relation to heritage, we consider the inclusion of the term 'extensive area' within the draft policy to be unnecessary and recommend its removal to ensure the policy is sound. The extent of land to be kept free from development should instead be determined through the detailed heritage assessment required by the policy.

Draft LP Evidence Base – Sustainability Appraisal Report (2nd Reg. 19)

- 3.3 Alongside the revised draft Local Plan, the Council has also published a revised Sustainability Appraisal (SA), in which Land at St John's, Exmouth (EXMO_20) has been assessed against the SA Objectives. The current SA identifies the site as a suitable strategic allocation and supports its role in meeting Exmouth's housing and sustainability needs within the plan period.
- 3.4 3West Developments broadly agrees with the majority of the SA scoring against the SA objectives and considers that the appraisal appropriately recognises the strategic merits of the St John's allocation. Where minor points of clarification or additional evidence are relevant, these are addressed below.
- 3.5 An assessment of the Council's SA findings is set out below, which is accompanied by a revised site suitability assessment undertaken by Boyer. This reassessment provides further evidence that the St John's site is capable of accommodating the scale of development

proposed in the Draft Local Plan and supports the conclusion that the allocation represents an appropriate, sustainable and deliverable option for growth in Exmouth.

Table 3.1 SA Assessment for EXMO_20 and Boyer's reassessment based on site-specific technical surveys and assessments

SA Objective	SA Score		SA Commentary	Boyer response	Boyer score
1. Biodiversity To conserve and enhance the habitat and wildlife of our natural environment.	+	-	Further north, Exmo_20 is covered by the 'Lowland Heath' Strategic Nature Area and draft Nature Recovery Network, and partly covered by woodland, shown as an Unconfirmed Wildlife Site. The Pebblebed Heaths SPA/SAC/NNR is across the road to the east of Exmo_20, with the 400m exclusion zone for new residential development extending into the site.	The masterplan for St John's has been explicitly landscape-led and informed by ecological evidence. Development is directed away from the most sensitive habitats, including the 400m SPA/SAC exclusion zone, with these areas retained as woodland, parkland and ecological buffers. The scheme will secure the long-term management of existing woodlands, hedgerows and watercourses, strengthen ecological connectivity, and deliver measurable biodiversity net gain (in excess of 10%) through on-site habitat creation and enhancement. The allocation therefore has a clear potential to conserve and enhance biodiversity at a landscape scale.	+
2. Landscape To conserve and enhance the special qualities and distinctive character of our landscapes, undeveloped coast and seascape.	-	-	Exmo_20 is a large site of some 85 hectares, with the north easterly parts being higher, more prominent and visually open, whilst the western and southern parts are well-screened with comparatively limited views in or out of the site on a local scale. The 400m buffer from the Pebblebed Heaths SPA/SAC coincides with the higher, more prominent parts of Exmo_20, meaning built development will not be permitted in this area and so reducing adverse landscape effects to a minor negative.	The St John's Woodland Village concept demonstrates that residential development, parkland and sport pitches can be sensitively accommodated within the site.. The creation of St John's Common, retention of woodland blocks, and structural planting will enhance landscape character and provide a strong, defensible transition between town and countryside. Overall, the scheme will conserve and enhance the distinctive landscape setting, including the relationship with the East Devon AONB.	0

3. Historic and built environment.	-	Exmo_20 has a small number of heritage assets whose setting could be adversely affected by developing the site – of most importance is the Grade II* St John in the Wilderness church, but also Grade II listed Barton House and St John's Lodge. Given the large size of Exmo_20, mitigation is likely to be possible, including avoiding development in the most sensitive areas, so a minor negative effect for Exmo_20.	The masterplan places St John in the Wilderness Church at the heart of the scheme within St John's Common, significantly enhancing its setting, accessibility and role as a community focal point. Development avoids the most sensitive heritage areas and respects key views and historic landscape features. The scheme will better reveal the significance of heritage assets and integrate them into a high-quality public realm, resulting in an overall positive effect.	0
4. Climate change and carbon emissions To minimise greenhouse gas emissions.	0	/	The scheme is designed as a "15-minute neighbourhood", prioritising walking, cycling and public transport, which will materially reduce car dependency and associated emissions. Buildings will adopt a fabric-first, net-zero-ready approach, alongside opportunities for renewable energy and low-carbon infrastructure. These measures represent a proactive contribution to reducing greenhouse gas emissions.	+
5. Climate change adaptation To adapt to the possible effects of climate change.	0	None of these sites are located in a critical drainage area and in general sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. Parts of some of the sites are however in floodplains and in these cases, Exmo_03, 16, and 17, have been given a neutral rating though this has been taken into account in respect of adjustments to possible yields.	The St John's masterplan integrates SuDS, natural drainage features, extensive green infrastructure, tree canopy cover and shaded public spaces, improving resilience to heat, drought and surface water flooding. The landscape-led design enhances climate adaptation capacity.	+

6. Land resources To utilise our land resources efficiently and minimise their loss or degradation.	0	Exmo_20 is mostly grade 3b agricultural land, apart from the eastern edge which is grade 3a. The north eastern part of Exmo_20 is in a mineral safeguarding area, but this largely coincides with the 400m buffer from the Pebblebed Heaths SPA/SAC where development will not be allowed in any case.	The allocation makes efficient use of predominantly Grade 3b land while protecting higher-quality agricultural land and mineral safeguarding areas through the 400m buffer and landscape-led design. Previously undeveloped woodland and sensitive areas are retained, ensuring a balanced and efficient use of land resources.	0
7. Water Resources To utilise our water resources efficiently and minimise their loss or degradation.	0	No sites are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply; and Maer Lane Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development at Exmouth, site refs Exmo_04, 06, 08, 16, 17, 18, 20, 23, 47, 50, Lymp_07, 14 (Water Cycle Study, November 2025). Therefore, a neutral effect is likely for these sites, with uncertainty for the others.	In addition to having no groundwater constraints, the scheme incorporates water-efficient design, SuDS and natural drainage, reducing demand on potable water and improving water quality outcomes. The allocation therefore supports efficient and sustainable use of water resources.	0
8. Home s To provide and maintain a sufficient supply of good quality, financially accessible	++	Exmo_17, 20 and Lymp_07 and 12 have a maximum yield in the HELAA at or over 100 dwellings (around 700 dwellings at Exmo_20), meaning a major positive effect	Agreed. The allocation will deliver a significant supply of high-quality, mixed-tenure homes, including starter homes, family housing, and specialist/retirement provision, supporting balanced demographics in Exmouth.	++

homes of mixed type and tenure to meet East Devon's needs.				
9. Health and well-being To support healthy, safe and active communities where people have access to attractive and functional recreation spaces	+	/	The scheme provides extensive accessible green space (including c. 8ha St John's Common), woodland trails, play areas and active travel routes, supporting physical activity, mental wellbeing and social cohesion. The community hub, school and village core further promote healthy, connected lifestyles.	+
10. Access to services To provide accessible and attractive services and community facilities for all ages and interests.	+	The sites with access to higher range of services, six or more, within 800 metres include Exmo_03, 07, 08, 20.	Agreed, the site will also deliver on-site community facilities, such as a primary school, work hub, café, community building. Accessibility to Exmouth via active travel routes will also be improved therefore bolstering links to existing services.	++

11. Jobs and employment To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity.	+	/	The allocation will create short to medium term construction employment, support local supply chains, and provide permanent jobs through the school, work hub, café and local services. Improved connectivity to Exmouth and Exeter will also enhance access to wider employment opportunities.	+
12. Town centres To safeguard and strengthen the vitality and viability of town centres.	-	/	The development is designed to increase footfall and spend in Exmouth town centre by prioritising active travel links, improving bus connectivity, and delivering a diverse working-age population likely to support local retail, services and leisure. This will support, rather than undermine, town centre vitality.	0
13. Connectivity and transport To connect people and	+	/	The scheme prioritises walking, cycling and public transport, proposes high-quality active travel corridors linking to existing networks, and provides flexible access options (St John's Road, Southern Wood, B3179). This will materially improve physical connectivity within and beyond Exmouth.	++

businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon														
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The revised suitability assessment for EXMO_20 is therefore as follows:

	1.		2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.	13.
East Devon SA assessment	+	-	-	-	0	0	0	0	++	+	+	+	-	+
Boyer revised assessment	+		0	0	+	+	0	0	++	+	++	+	0	++

- 3.6 The above revised site suitability assessment for Land at St John's, Exmouth (EXMO_20), which has been informed by the site's specific technical surveys and assessments prepared by relevant technical consultants, demonstrates that the site is capable of accommodating the scale of development proposed for St John's Woodland Village (up to circa 700), while continuing to positively contribute towards EDDC's Sustainability Objectives.

Technical Reports

- 3.7 These representations are supported by a full suite of Technical Reports, which have informed the St John's Woodland Village concept masterplan for Land at St John's, Exmouth (EXMO_20). These reports demonstrate that the site is suitable for the scale of development proposed in the Draft Local Plan and can be delivered in a manner consistent with the Vision Statement.
- 3.8 The technical reports demonstrate that the St John's site is capable of accommodating the level of development proposed in the Draft Local Plan in a sustainable and well-designed manner. The technical reports are summarised below.

Landscape

- 3.9 A Landscape and Visual Appraisal was prepared by LDA Design which outlines the key landscape constraints of the site. The appraisal confirms that the site lies outside any formal landscape designation. The site is situated close to East Devon National Landscape and the Pebblebed Heaths SPA/SAC/SSSI to the north. Although not directly within these protected areas, the site's visibility from higher ground, such as the B3179, and its proximity to the designated landscapes introduce important visual and environmental sensitivities. A 400m buffer from the SPA/SAC has been integrated into the masterplan, limiting development on the more prominent northern ridgeline.
- 3.10 The site's landscape character is defined by rolling farmland, mature woodland, hedgerows, and the presence of St John's in the Wilderness Church, a heritage feature. The emerging masterplan responds to these constraints by focusing development in the lower, less sensitive areas of the site, incorporating substantial green infrastructure, and preserving key views and natural features to ensure a respectful transition between the town and surrounding countryside.
- 3.11 The proposed development will not result in a significant effect on landscape.

Transport and Highways

- 3.12 A technical note has been prepared by SLR Consulting to assess the potential traffic impact of the development, particularly on key routes. To assess the traffic impact, the study examined how vehicle trips generated by the development are distributed and assigned across key access routes. Traffic data was gathered using Automatic Traffic Counters (ATCs) over a seven-day period, allowing comparison of projected increases against typical daily fluctuations to determine if mitigation measures are necessary.
- 3.13 The technical note concluded that suitable vehicular access can be achieved into the site, with proximity to the local highway network and existing infrastructure. Traffic modelling indicates

that most surrounding routes will experience negligible increases in traffic flow, Dinan Way is projected to see traffic increases exceeding the typical 10% threshold during peak hours, however, this is not likely to be in excess of 30%, and therefore the overall impact is not considered to be significant.

Ecology and Arboriculture

- 3.14 A Preliminary Ecological Appraisal (PEA) has been undertaken by GE consulting to identify potential ecological constraints associated with the site. The assessment comprised both a desk study and a walkover habitat survey in accordance with UKHab (2023) guidance. The desk study included a review of available ecological records, supported by data from the Devon Biodiversity Records Centre (DBRC), to determine the proximity of designated sites and the potential presence of protected or notable species. The walkover survey recorded habitats on site, including any features of ecological interest, invasive species, or signs of protected fauna.
- 3.15 No overriding ecological barriers to development have been identified. The site's ecological assets can be addressed through further survey work, appropriate mitigation, and habitat enhancement. The findings of these assessments will inform the site's design evolution and ensure compliance with planning policy, biodiversity legislation, and the National Planning Policy Framework (NPPF). The Proposed Development will not result in a significant adverse effect on ecology.

Heritage and Archaeology

- 3.16 A technical note regarding the heritage impact of a proposed development has been prepared by Alan Baxter Ltd, which included a review of historic mapping, and understanding of the development of nearby designated assets and a site visit to assess topography and intervisibility.
- 3.17 The Technical Note concluded that the proposed development would have a limited impact on designated heritage assets within and surrounding the site. The Grade II listed buildings along St John's Road would be well screened and physically separated from the development, resulting in a neutral effect on their setting and significance. The Grade II* listed church would experience a degree of change to its wider rural setting due to the introduction of built form to the north, east, and south, although its immediate setting remains largely unaffected.
- 3.18 This change is assessed as resulting in a low level of less than substantial harm, at the minor end of the spectrum, in line with national policy. The impact is confined to the contribution made by the church's wider setting, and not its core heritage value. With further design refinements and landscape mitigation, it is likely that this impact could be reduced further.
- 3.19 The proposed development is not considered to result in a significant effect on heritage assets.

Flood Risk and Drainage

- 3.20 The majority of the site lies within Flood Zone 1 (i.e the lowest Flood Risk Zone), with small areas located within Flood Zones 2 and 3 to the west of the site associated with an existing watercourse running from the north to the south, which would be kept free from development.

- 3.21 The existing surface water flooding can be addressed through the creation of a new Sustainable Drainage System to manage surface water runoff across the site effectively. The proposed development will be delivered outside of areas at risk of flooding (from all sources).
- 3.22 The proposed development will not result in a significant effect on flood risk.

APPENDIX 1. VISION DOCUMENT

St John's Woodland Village

A place to belong



“

St John’s Woodland Village will be an extraordinary place inspired and defined by a hidden landscape.

The proposals will leave a lasting legacy and deliver a place of distinction where people of all ages are put in touch with nature to lead healthy and happy lifestyles.

”

CONTENTS

1.0	Introduction	4	3.0	Masterplan Vision	21
	Vision for the future residents	4		Design moves	22
	Design principles	5		Illustrative masterplan	24
2.0	Context	7		Place for all	25
	History of the place	8		Land use and density	26
	Economy and planning	10		Land budget	27
	Existing context	12		Sustainable travel	28
	Site scale context	14		Visuals	30
	Opportunities & constraints	15			



The Vision for St John's, Exmouth

St John's Woodland Village will be an extraordinary place defined by a hidden landscape and where people of all ages will be put in touch with nature.

This contemporary woodland village will become a place of authenticity that emerges

in a world of its own, self-contained but enjoyed by all.

St John's community core and a bold new and accessible landscape will promote healthy and happy lifestyles.

The identity of the place and its community will

become renowned for a heightened environmental awareness.

A contemporary village inspired by the landscape. A community in touch with nature.

...A place to belong.



Contemporary woodland village

... a place of authenticity and a distinct identity that emerges in a world of its own



Strong Community

... a community core that complements the existing community assets and puts people in touch with nature to nurture a shared ethos of environmental awareness



Landscape Heritage

... protecting landscape assets that are centuries old and leaving a lasting legacy for the future



Self-sufficient 15 min place

... opportunity to live, learn, play, work, grow produce, grow a family, and live healthy happy lifestyles



Gateway to nature

... a woodland village on the threshold of the East Devon Area of Outstanding Natural Beauty



Place for all

... a village for people of all ages to live and thrive, from young professionals and families through to elderly residents

Context

History of the place

Between the 19th and 21st centuries Exmouth grew considerably, adopting the layout patterns typical for each time period. However, the urban core and landscape features have remained in place throughout.

The town has experienced significant growth since the 1960s. More recently, the

opening of Dinan Way has enabled the built urban area to extend to the north and east to adjoin with the edges of the St.John's site boundary. Goodmores Farm represents the next phase of development in the planning pipeline, further extending the town to the north.

The St John's site comprises a patchwork of fields, hedgerows and woodland. These mature hedgerows and woodland would offer an attractive setting for new residents, whilst their retention and sensitive treatment would help to support biodiversity and important ecological corridors extending into and out of the town

Exmouth is the district's largest town, its 36,000 residents representing 25% of the district's population^{1,2}. As such, it should be a focal point for future strategic growth considerations.

As would be expected from a town of its size, it has a good range of services, sports facilities

and education provision, and benefits from good rail and road connections to Exeter and surrounding towns. Furthermore, its residents enjoy a superb quality of life with easy access to the Jurassic Coast, Woodbury Common and the Exe estuary.

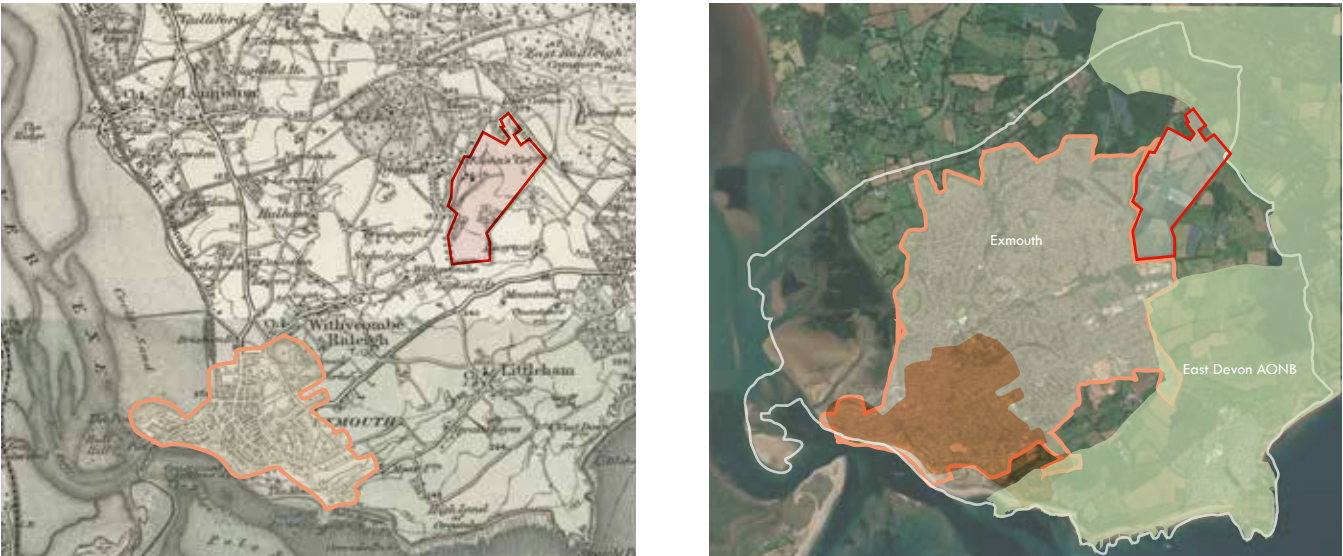
The sensible planning approach is to grow the district on this strong and well-supported urban foundation.

1. Exmouth Neighbourhood Plan
2. Devon County Council – Exmouth Profile

This vision document demonstrates how a new urban village and woodland parkland asset for the town can be delivered on the site to help deliver the growth that Exmouth and the district need to sustain their economic futures, whilst protecting and enhancing the landscape and sensitive habitats within and surrounding it.



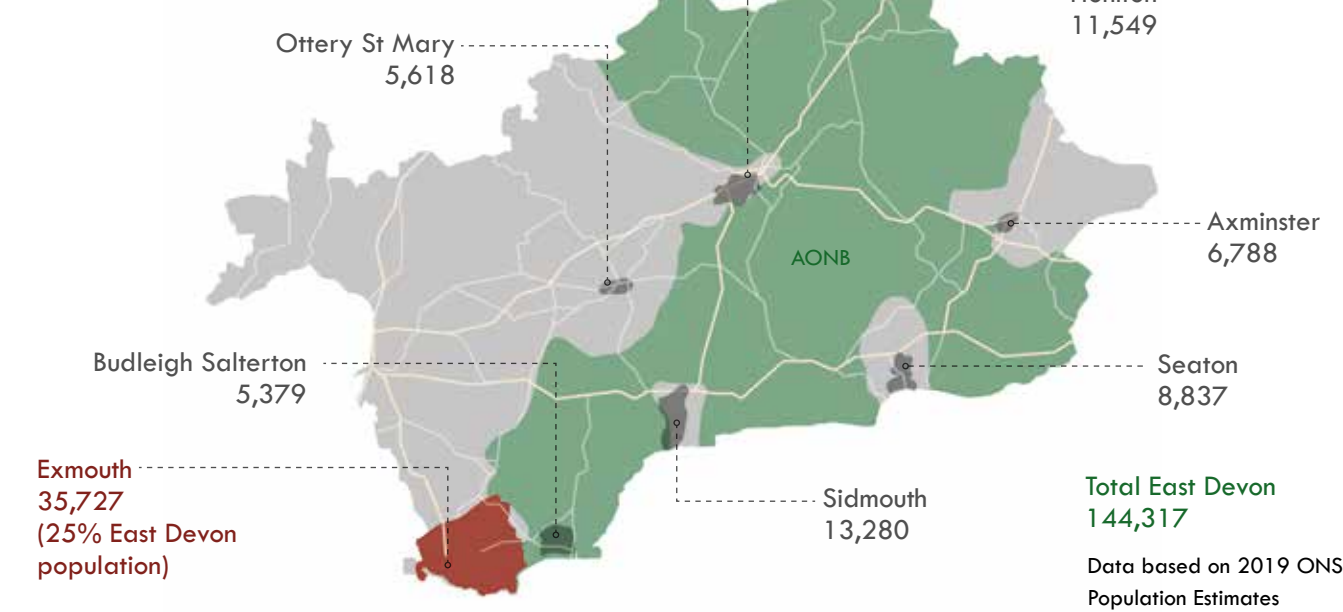
Exmouth historical changes



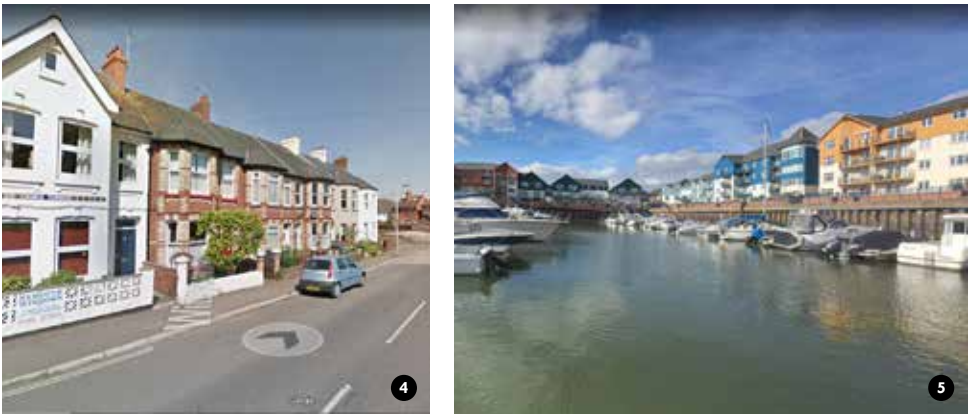
The site heritage



East Devon population



Exmouth built up area heritage and modern times



- 1. Historical landscape of fields, hedgerows and woodland
- 2. St John in the Wilderness
- 3. Mature hedgerows and woodlands
- 4. Typical Exmouth neighbourhoods
- 5. Exmouth Marina

Economy and Planning

Following East Devon's decision to withdraw from the Greater Exeter Strategic Plan, large-scale growth aspirations will now be guided through the preparation of a new district Local Plan. The Local Plan

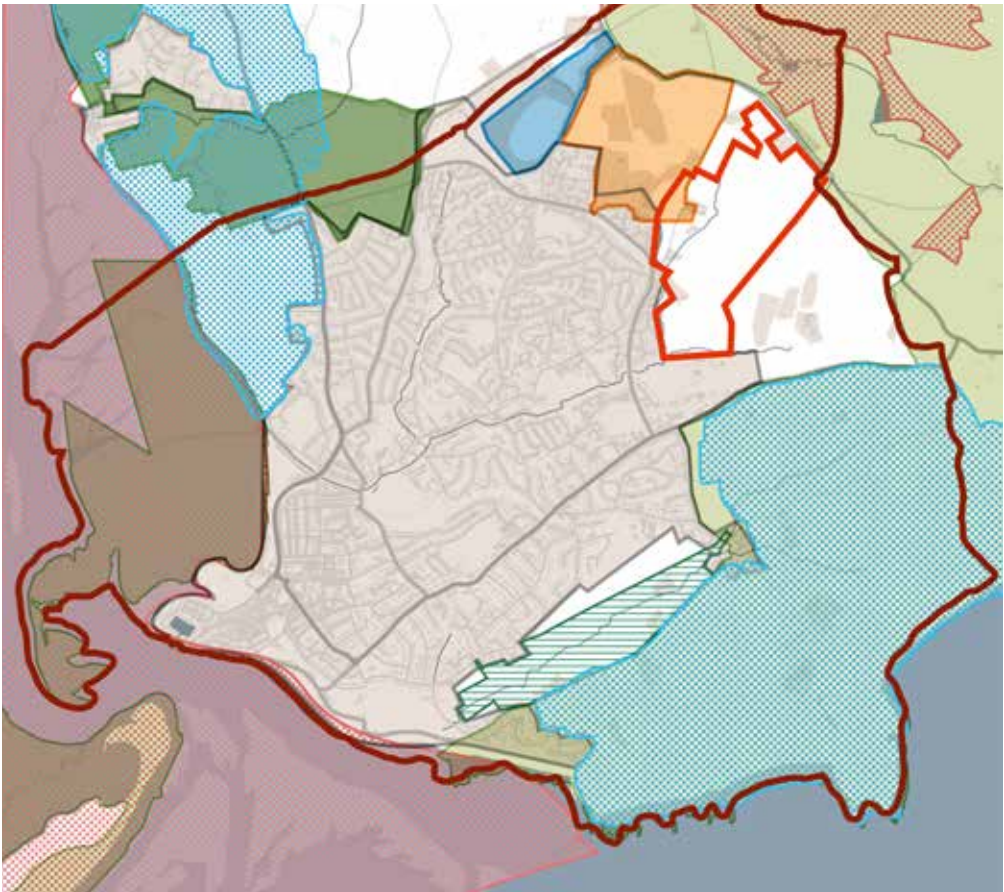
will likely have to be prepared in accordance with the proposals set out in the Government's Planning for the Future White Paper, allocating land for growth, renewal and protection across East Devon.

One of the key recommendations in the White Paper is the introduction of a new method of calculating housing provision which, if implemented, could result in an increase in East Devon's annual housing requirements from 928 dwellings currently to 1,614¹.

Regardless of whether or not the new standard methodology for housing requirements is introduced, East Devon faces some important spatial decisions when it comes to planning for growth. Sustainably located sites are at a premium in a district that is constrained by numerous

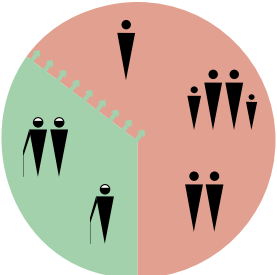
environmental designations covering a significant proportion of the land area. Exmouth's high quality of life offer is a magnet for retired residents in particular. So much so that the ONS identified Exmouth as being within the top 10 towns in England for most

elderly median age of residents⁴. Demographic projections suggest that, without intervention, this age profile is only going to become more exaggerated, with more over 65-year olds and fewer young people and families of working age.



- | | |
|------------------|-------------------------------------|
| Exmouth boundary | Special Protection Area |
| Built up areas | Coastal Preservation Area |
| Site | Green Wedge |
| Marley | Area of Outstanding Natural Beauty |
| Bystock | Proposed Littleham/Maer Valley Park |

Ageing resident population²

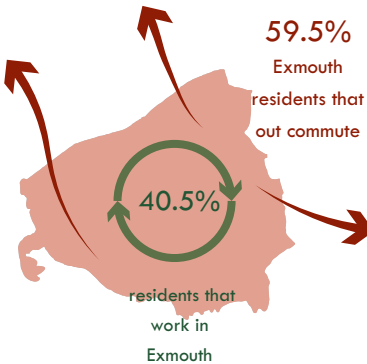


28% over 65 years

Exmouth also has a relatively narrow economic base, with over 60% of jobs falling within the accommodation and food (18.9%), wholesale and retail trade (17.2%), health and social work (16.5%) and education (11.2%) sectors⁵. As a result of this, the town has a very low level of self-containment, with substantial numbers of economically active residents commuting to the Exeter area on a daily basis⁶.

It is clear that without the provision of a decent range of starter homes and family housing, the population will continue to age, the economic base will continue to polarise, and the vitality and viability of Exmouth town centre will be further undermined as retailers compete for a fast diminishing segment of consumer spend in the face of strong competition from online shopping

High levels of net out commuting³



The question is, how and where can Exmouth accommodate housing growth to help support a more balanced demographic profile and the diversification of its economy? Analysis of the diagram on p.10 reveals that the fringes of the built-up urban area are largely protected by environmental designations, notably the East Devon Area of Outstanding Natural Beauty, the Coastal Protection Area and the

Exe Estuary Special Protection Area. Furthermore, the current Local Plan allocates land between Exmouth and Lymstone as a Green Wedge, and the Neighbourhood Plan protects against development in the land holdings of the former Marley and Bystock Estates and an area designated for the proposed Littleham/Maer Valley Park. This effectively leaves the land at St John's on the north east fringe of the built urban area as one of the only options for delivering sustainable growth in Exmouth over the next Local Plan period.

1. Lichfields (2020) Keeping up with the pace: What does the new standard method mean for the South West
2. ONS Population Estimates 2019
3. ONS Census 2011
4. BBC (2014) The Town that Thronged with Old People
5. Devon County Council – Exmouth Profile
6. ONS – Census 2011

Existing Context

The proposals for St John's Woodland Village have been shaped by an appreciation of the place itself and an exploration of opportunities to deliver sensitive, good growth that results in benefits beyond the red line boundary of the site.

The development site lies in the gap between the Exmouth town boundary and the built up urban area, with its south-western part adjoined to existing neighbourhoods. Virtually all of the site is well-screened from views from the surrounding area

by topography, mature vegetation and existing built form, and not visible from key, sensitive locations like the SW Coast Path, the main centres of population and more distant places such as Dawlish Warren. Only the northernmost, elevated part of the site might potentially be exposed to views from

across the estuary to the west, but would form a very small, undiscernible component of the view at such distance. The site's peripheral location does not limit potential foot and cycle links to the historical civic core and train station. Moreover, the site has a

unique setting for a new community to emerge in touch with nature and surrounded by the East Devon AONB. This presents an opportunity to lead with landscape to deliver good growth and put in place a sympathetic transition between 'town and country' in perpetuity.

The proposals at St John's Woodland Village allow for a celebration of this gateway between the urban area and nature, forging dynamic and lasting green infrastructure connections that will benefit the existing community, and safeguard Exmouth's more valuable landscape assets. The parkland setting

and woodland asset to the west will provide a new recreational resource for Exmouth residents ensuring that the development is self-contained, thereby ensuring that the sensitive Pebblebed Heath habitats are not exposed to increased visitor pressure.



1 A distinctive, self-contained community

The scale and location of the site provides an opportunity to create a new community that is complementary to Exmouth and its town centre. Comfortable walking distances within the site mean that there is an opportunity to

achieve a degree of self-containment, with future residents easily able to access open spaces, co-working hubs and social infrastructure, whilst at the same time increasing activity and spend in the town centre.



2 Connecting wider green infrastructure

The generous amount of woodland within the site offers great potential to create a new and unique recreational resource for new residents and Exmouth as a whole. Providing distinctive views next to well equipped

public open spaces and amenities, the place has potential to become a recreational hub, and together with mature woodlands under the site promoter's ownership, will reduce the recreational pressure on the sensitive AONB.



3 Community assets for all to enjoy

The new community hub with a school, 15th century church, café, working hub, playgrounds and village green is to become a new destination for residents both old and new.

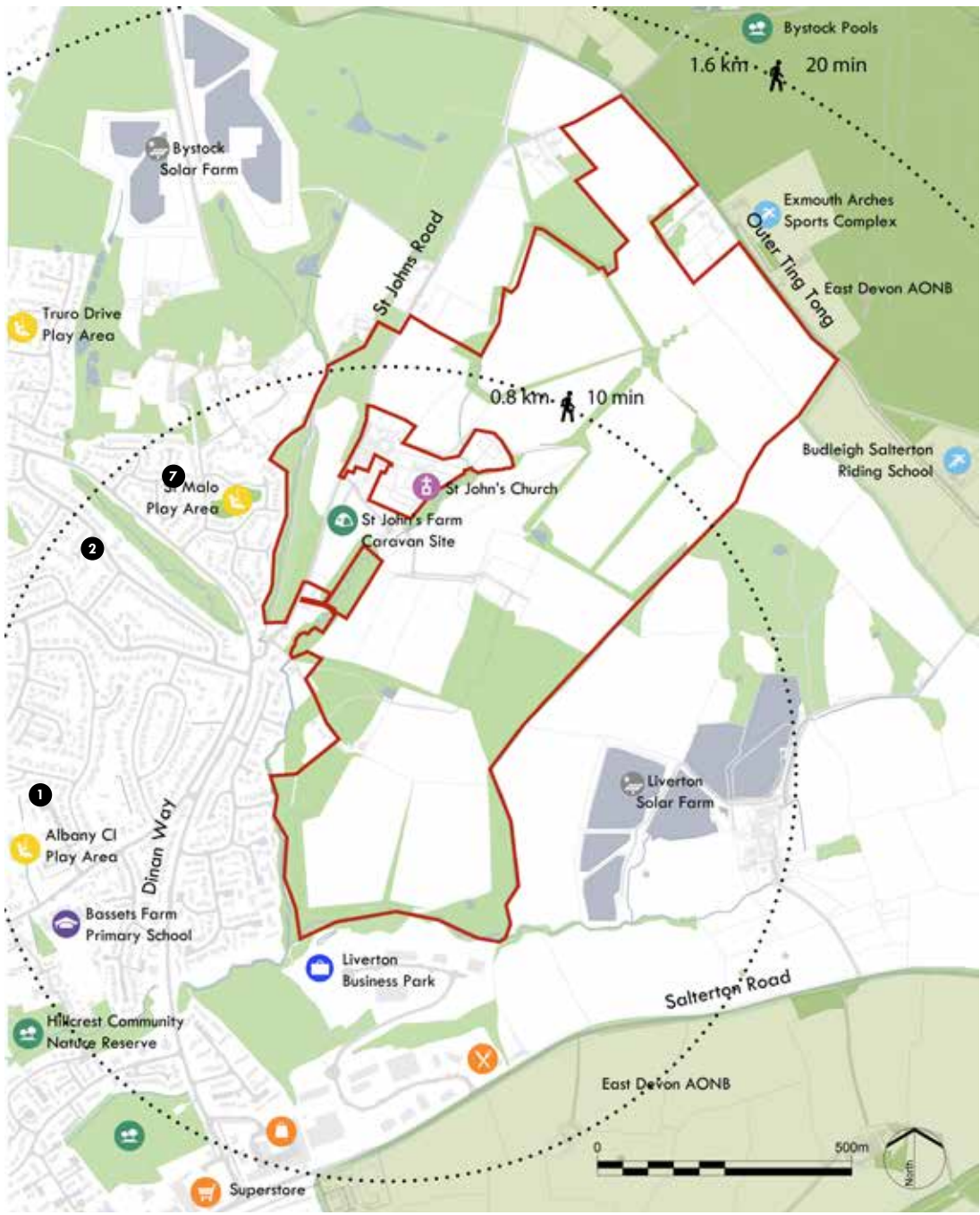
New routes should prioritise walking and cycling, minimising the reliance on the cars not only for the future St John's Woodland Village residents, but also for visitors from adjacent neighbourhoods.

Site scale context

The site is well enclosed and sits at the transition between town and country. Recent developments around the site, including Bystock and Liverton solar farms and Liverton Business Park already give the perception that the built urban area boundary is extending outwards.

Despite being separate from Exmouth in visual terms, the site is physically attached to existing schools and open spaces. Enhancing access to the landscape and sensitively treating existing features and the setting of the AONB, will allow a community to emerge with its own identity, while making a

complementary addition to Exmouth; using landscape to define an appropriate edge in perpetuity. St.John's Church is a key heritage asset at the heart of the site which can become a new focus for community life, forging links between the new and existing developments.



1, 2 .Vehicular accessibility:
(1. Access through Southern Woods
2. John's road, narrowed with mature
hedgerows)
3,4. Undulating topography, mosaic of
woodlands and field boundaries
5,6.Mature hedgerows on site
7,8. Visual and heritage related
sensitivities

Opportunities and Constraints

Ownership within the site
The site benefits from a considerable area of land under control by a landowner consortium with a deep history in the local area. In addition to the core development area, the consortium own land to the west that has the potential to become a

substantial recreational asset for the town. The site is very well served by existing utilities infrastructure and so, compared to standalone new settlements, there will be a relatively low cost for infrastructure provision, enhancing viability and the scope for affordable housing and community facilities. The CIL contribution will enable other infrastructure

projects to be delivered for the good of the town.

Vehicular access options:
Three existing publicly adopted highway access points into the site can be utilised:

- Access from St John's Road can be achieved with improvements to the existing highway network to deliver improved pedestrian and

cycle connections by way of localised widening or altering vehicle priority with appropriate shuttle work through narrow sections. Alternatively, land on either side of St John's Road could be utilised for a re-aligned vehicular access route, allowing St John's Road itself to become an active travel corridor through the centre of the site.

- Access from the southern boundary of the site can be achieved via the existing residential estates roads of Southern Wood and Meadow View Road. The local network is of traditional design with wide carriageway and footways either side, providing flexibility in the future to provide improved pedestrian and cycle connectivity while retaining core traffic

capacity. The B3179 forms the north eastern boundary of the site where a significant site frontage allows for flexibility in achieving access at this point. This is likely to form a principal route to destinations beyond the local Exmouth catchment, with journey times from the northern boundary of the site along the B3179 being at least as attractive

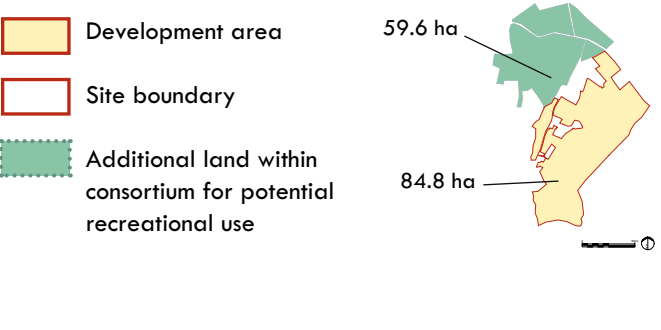
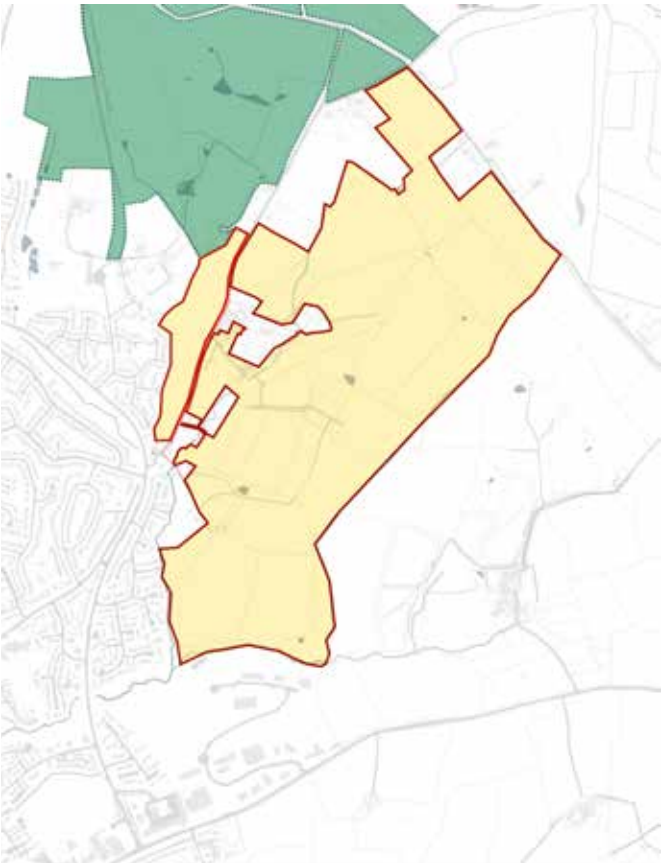
as Dinan Way and would form a preferred route for those living in the site.

Mosaic of fields and woodlands

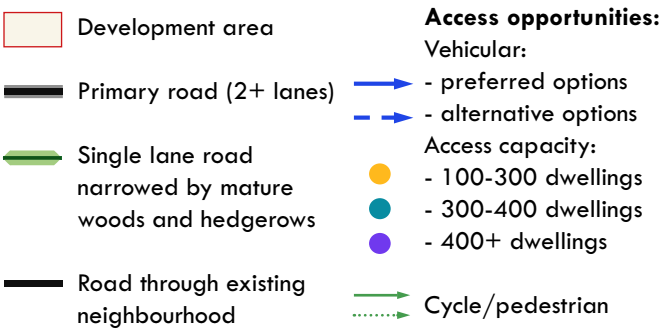
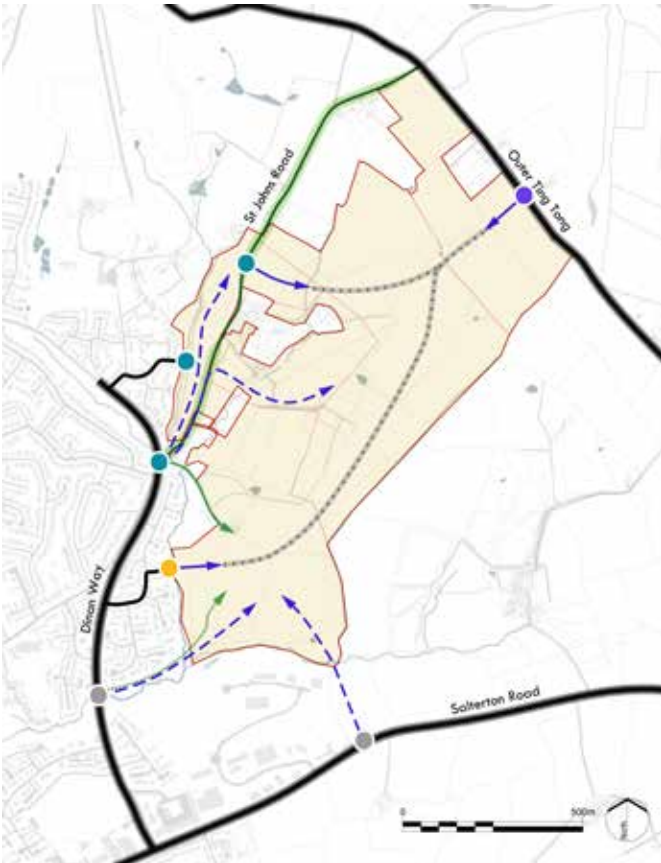
The site is characterised by a mosaic of well enclosed fields set within a mature network of broadleaved woodland and hedgerows. The wooded landscape character and visual

containment of the site defines character, and creates placemaking opportunities for a self contained community to emerge that sensitively fits within the landscape setting. Retention of woodland areas, hedgerows and watercourses will help create identity as well as protect on site biodiversity.

Ownership within the site



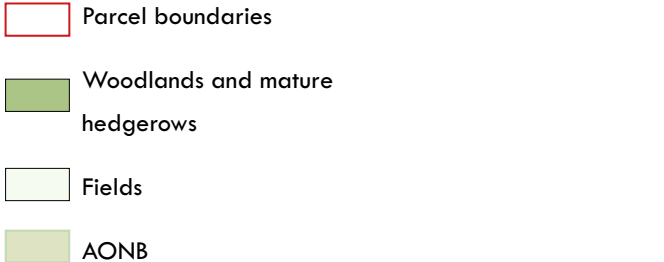
Vehicular access opportunities



Steep topography



Mosaic of fields and woodlands



Opportunities and Constraints

Landscape Designations
The Pebblebed Heaths located to the north-east of the site have the following landscape designations: Special Area of Conservation (SAC) and Special Protection Area (SPA). The East Devon Local Plan stipulates that, in order to protect

the Pebblebed Heaths, new dwellings will not be allowed on or within 400 metres of the SPA

Visual Impact and Sensitivity
The site accommodates a number of view corridors related to listed buildings. Areas with high visual

impact are located to the south of St John's church and along Outer Ting Tong to the north-east of the site. The masterplan will consider these sensitive views and will place development parcels in respect to them.

Composite Constraints and Opportunities Plan

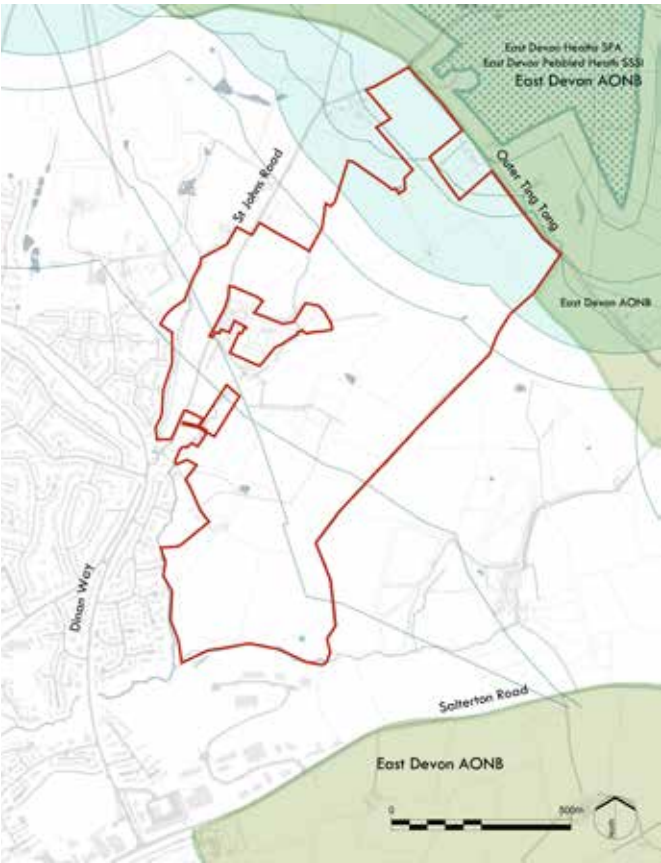
Based on the analysis of the site constraints and opportunities the site has been divided into plots that mostly follow the historical landscape structure, and each of the plots has been assessed on the suitability for development. The major factors that

informed this assessment included landscape designations as well as the quality of the existing mature landscape and its value for the area.

The site's topography and natural drainage opportunities have also been assessed.

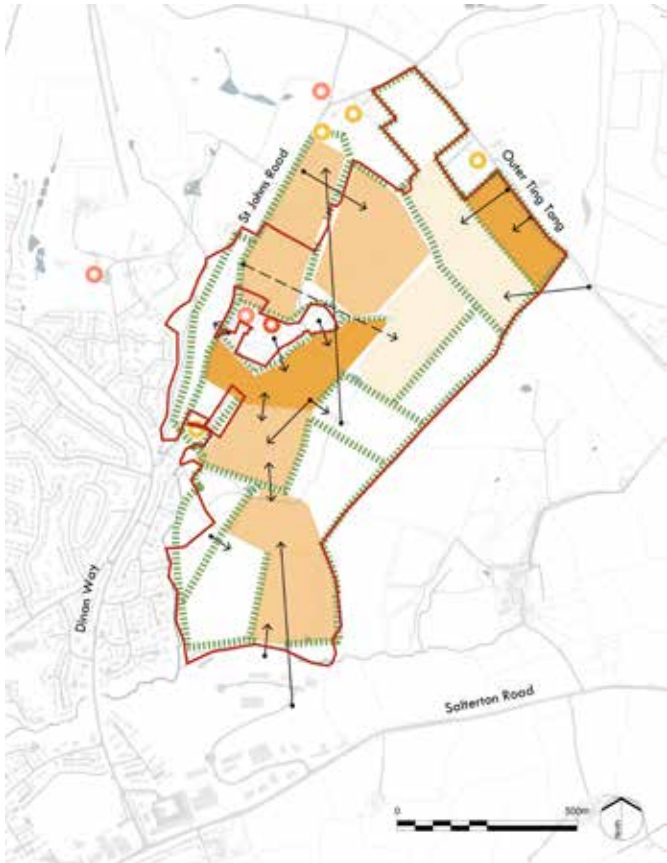
The setting of St. John's Church and the overall impact on the historical context of the wider landscape have also been considered whilst seeking to make a positive, sustainable addition to Exmouth.

Landscape designations



- Parcel boundaries
- SACs, SPAs and SSSIs
- AONB
- SSSI impact areas

Visual Impact and Sensitivity



- Visual impact:
- No visual impact
- Moderate
- High visual impact
- Physical/visual border
- Listed Grade II*
- Listed Grade II
- Other buildings to consider
- Connections



- Not suitable for development:
- Mature woodlands
- Ecological restrictions/sensitive site
- Historical site (landmark, community core, heritage character)
- Suitable for development:
- Developable areas

- Not suitable for development:
- Total 43.3 ha
- Including:
- 17.0 - ecological buffer
- 22 - woodlands and wedges
- 4.3 - sensitive site
- Gross developable:
- 41.5 ha

Masterplan Design Proposal

Design Moves

The masterplan is underpinned by a series of simple design moves that respond to constraints and opportunities to set out a clear strategy for how a masterplan could be developed in more detail.

When considered together, the big moves create a fundamental framework that allows for flexibility for detailed solutions to emerge.

Each move seeks to create character, place and lifestyle opportunities that will help deliver upon the potential described in this vision document.

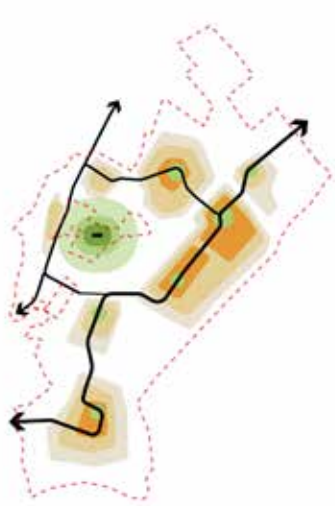
1 Landscape Led



“Inspired by nature”

Working with, and enhancing existing landscape assets and habitats, a high quality landscape framework intuitively flows through the site creating opportunities for residents and the surrounding community to enjoy enhanced access to this new landscape AND surrounding green infrastructure.

2 Development clusters



“In touch with nature”

Development perched on the landscape edge to promote a shared ethos of environmental awareness with people put in touch with nature at every opportunity.

Defined by the Woodland backdrop, this concept promotes a clear identity.

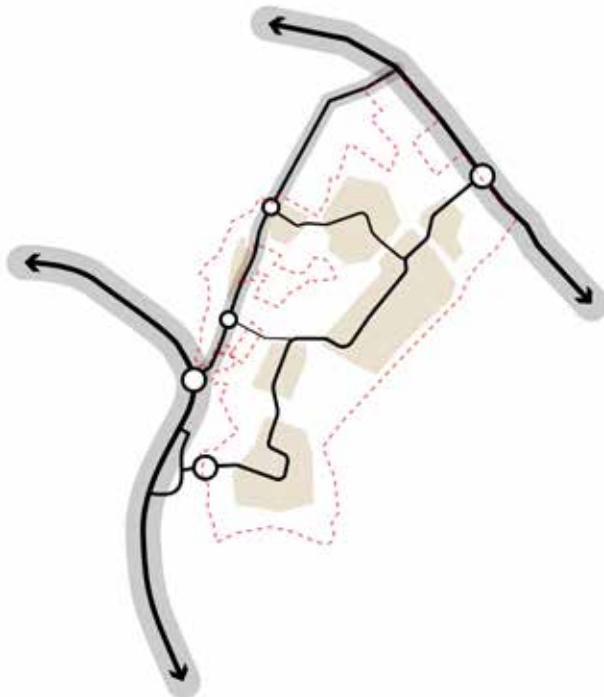
3 A Village street



“The anatomy of a village”

A connecting causeway that recreates the character and qualities of older patterns of development and living that were more in tune with natural systems. A street designed for people and pedestrian experience as a priority.

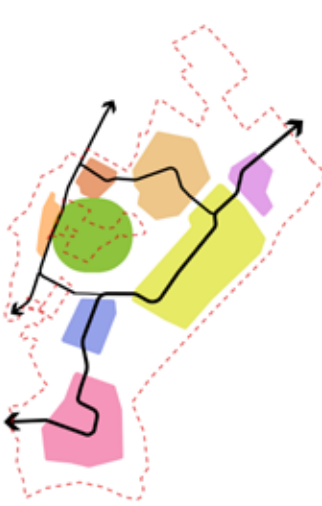
4 Self contained but connected



“A 15 minute place”

Learning lessons from lockdown and future-proofed for future lifestyle needs, the Village will be connected via innovative mobility solutions and active travel options PLUS workspaces and open spaces to deliver daily needs within 15 minutes walk to encourage healthy and happy lifestyles.

5 Distinct character areas



“Distinctive places”

Each cluster of development has an identity inspired by its landscape setting, promoting a sense of ‘post code pride’ and creating a place of distinction and authenticity. The diversity and distinctiveness will make parcels attractive to a range of developers to facilitate the pace of delivery.

6 Varied density and mix



“Places for all”

A place with a variety of development products to attract people of all ages, delivering homes, not buildings. A place that appeals to a wider demographic and is particularly attractive to families, helping to arrest the town’s gradual economic decline.



The Vision for St John's, Exmouth

Two thirds of people polled recently in the UK felt that a sense of community has declined in their lifetime.

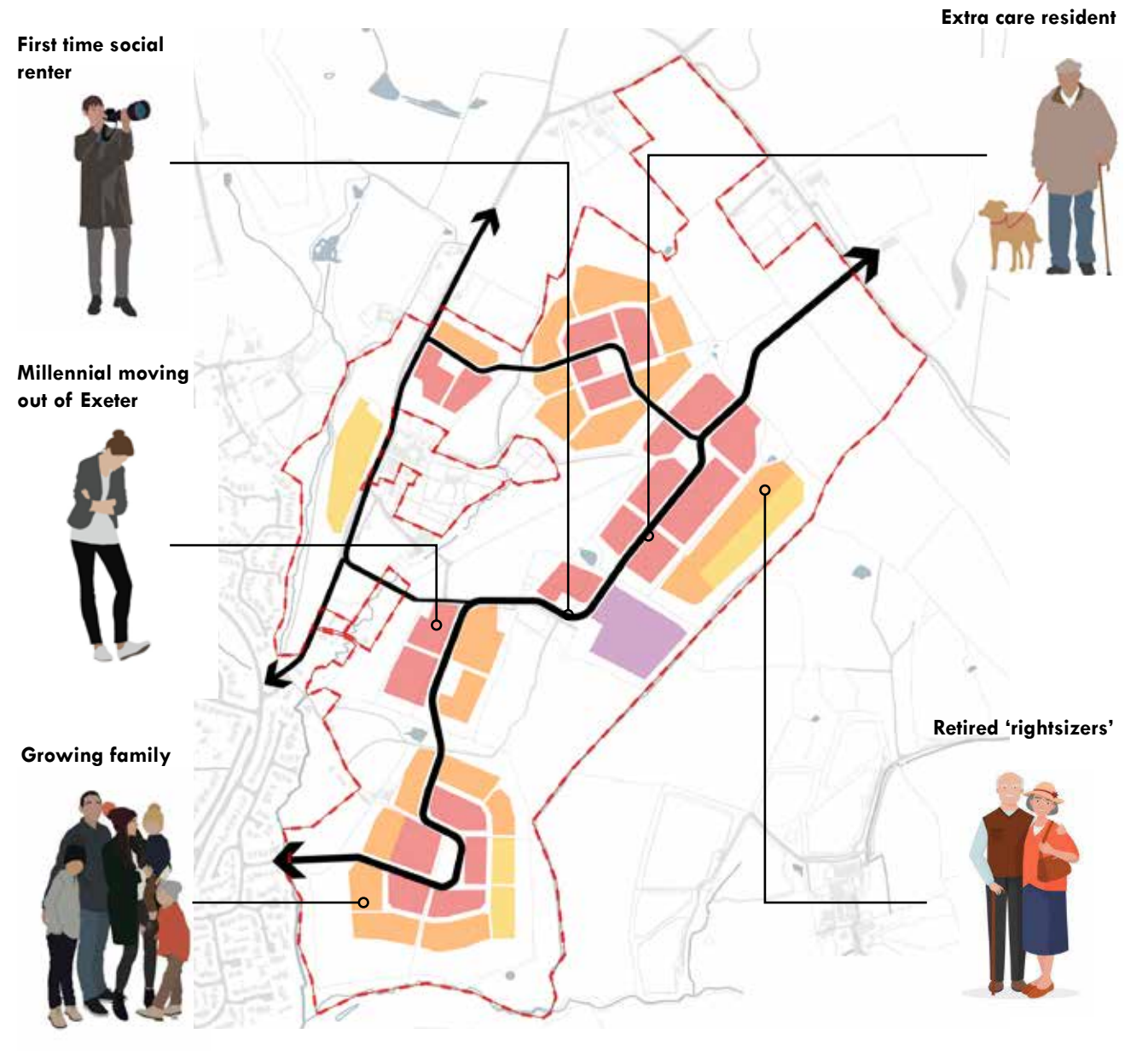
The vision for St John's Woodland Village seeks to reverse this trend.

The proposals start with a desire to understand who might live here and how might they thrive to create a community that will be fully adaptable to meet people's changing needs, regardless of age, race, faith, or mobility.

The priority for the scheme is to create a sense of community with a place that encourages neighbours old and new to come together in a place that they can call home and experience a lasting sense of belonging.

People respond strongly to places which feel welcoming, safe and inclusive, so, the masterplan is structured in a way to create these conditions and add to the pleasure and pride people take in their community, increase the desire for people of all ages to invest in a home for each stage of their life, and nurture healthy and happy lifestyles in a place they are proud to call home.

A community where all feel a sense of belonging



The Vision for St John's, Exmouth

The site commands a sensitive design approach to create a truly special place that responds to the quality of the existing landscape.

The masterplan seeks to create a place that benefits Exmouth as a whole while also achieving the degree of self containment desired to create a place with a sense of community spirit and vitality. To achieve this balance, a range of densities are proposed across the site, with a logical distribution according to location in order to support place making objectives and to respond to sensitivities associated with the landscape

and accessibility.

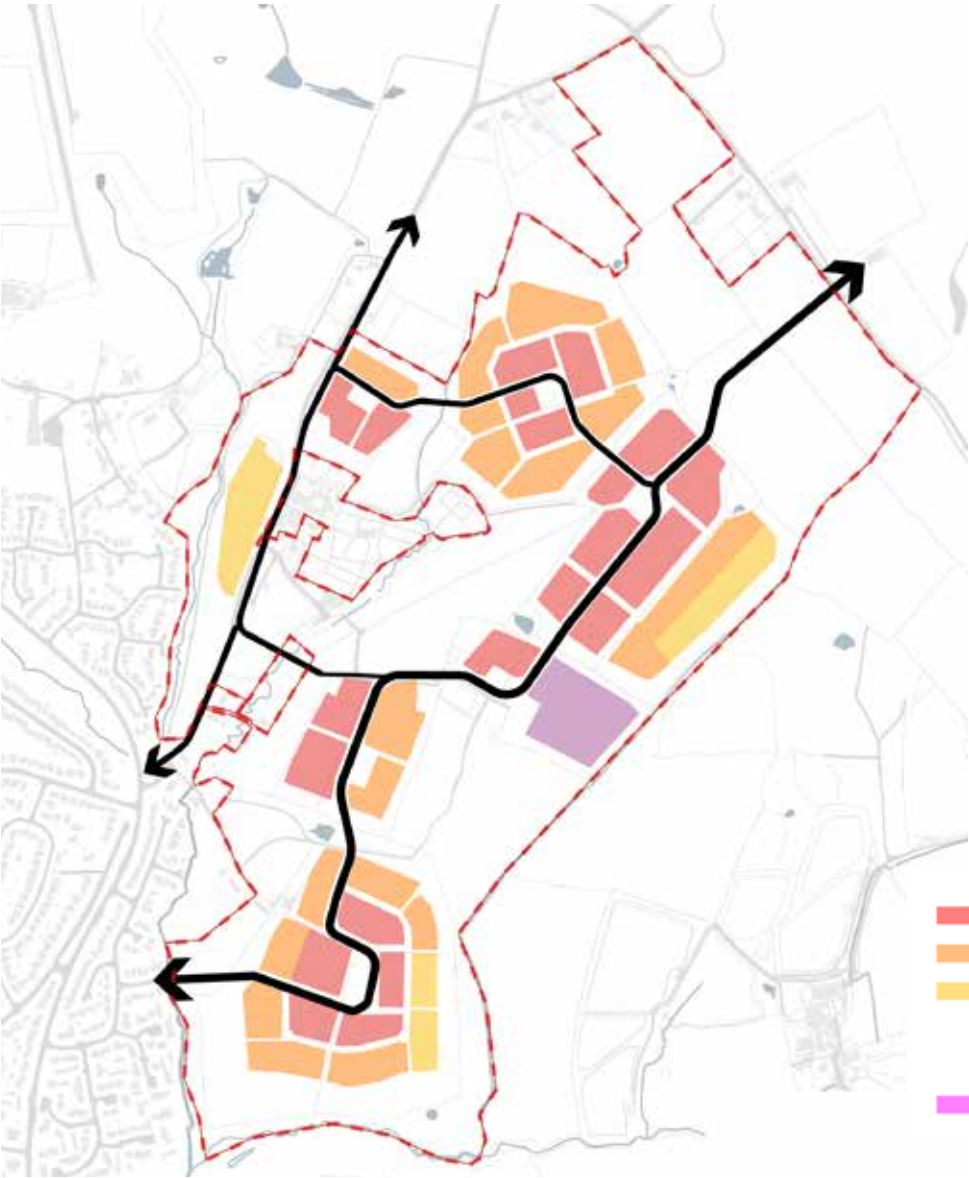
The density profile provides a flexible framework within which a range of residential products could be delivered to respond to emerging local needs including starter homes and social rental apartments; through to larger detached family homes; retirement homes for 'right-sizers'; and bespoke properties for quality retirement and extra care needs.

The masterplan also allows for the delivery of the necessary social infrastructure including primary school, a work hub and community building, all with the aim of creating a place where people can live, learn, work and play. This is all set within a strong landscape structure with ample open space. St John's Common measures c 8 hectares and is approaching the size of Phear Park and The Maer.



Character of the place

Land Use and Density



719
Homes

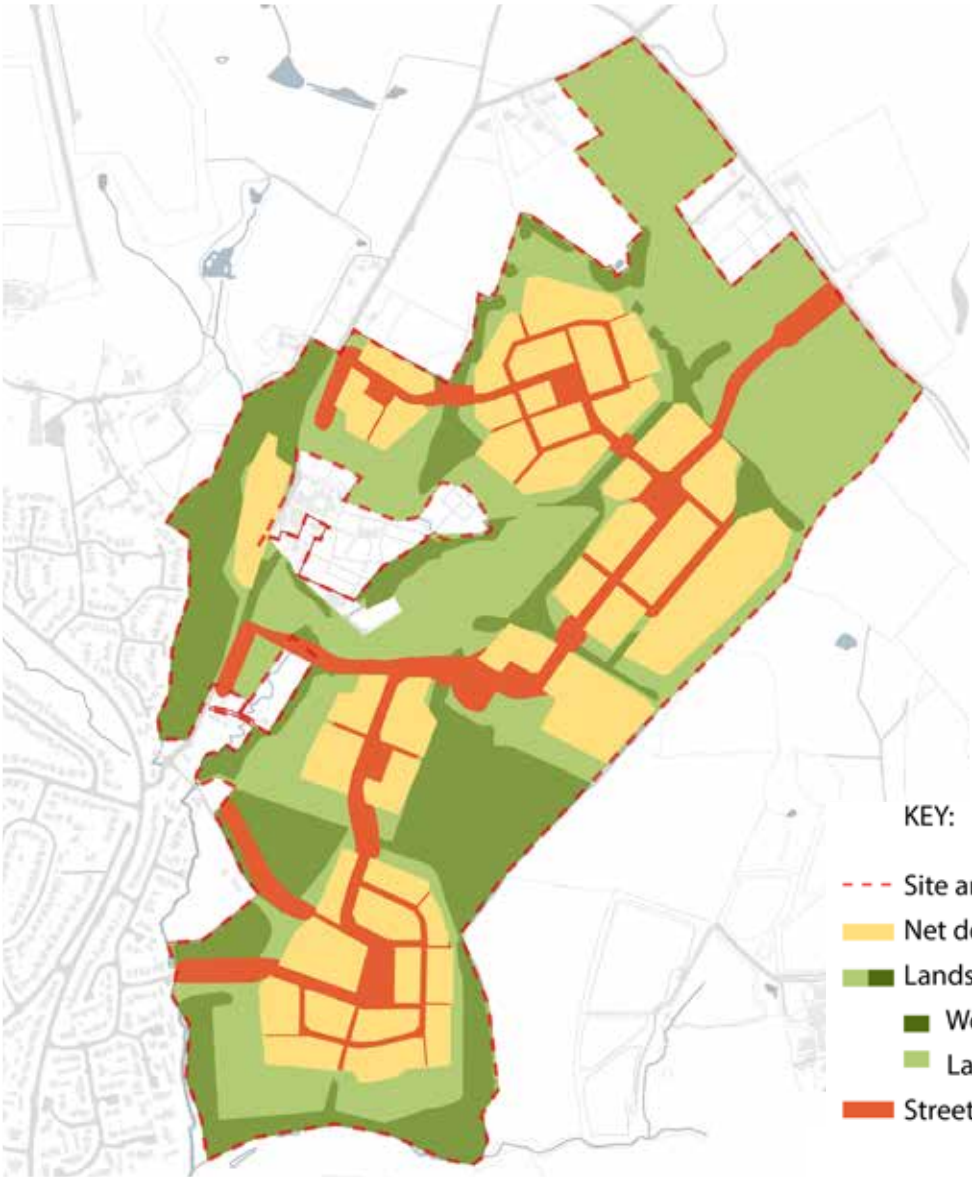


1800
Population

40dph 9.47 Ha = 379
30dph 9.43 Ha = 283
20dph 2.85 Ha = 57
TOTAL homes: 719

Primary School site 1.5 Ha

Land Budget



23.25 ha
NDA



6.5 ha
Public open
space required

KEY:

--- Site area: 84.78 Ha
Net development area = 23.25 Ha
Landscape/nature assets = 49.23 Ha
Woodland = 22 Ha
Landscape = 27.23 Ha
Streets and public realm = 12.3 Ha

Sustainable Travel

Residents of the site will benefit from close proximity to employment, schools, recreation space and local facilities, combined with excellent mobility options. As such, there is an opportunity to influence resident travel mode switch away from car use, thereby maximising the ability to achieve net zero Carbon ambitions and the

promotion of active and healthy lifestyles.

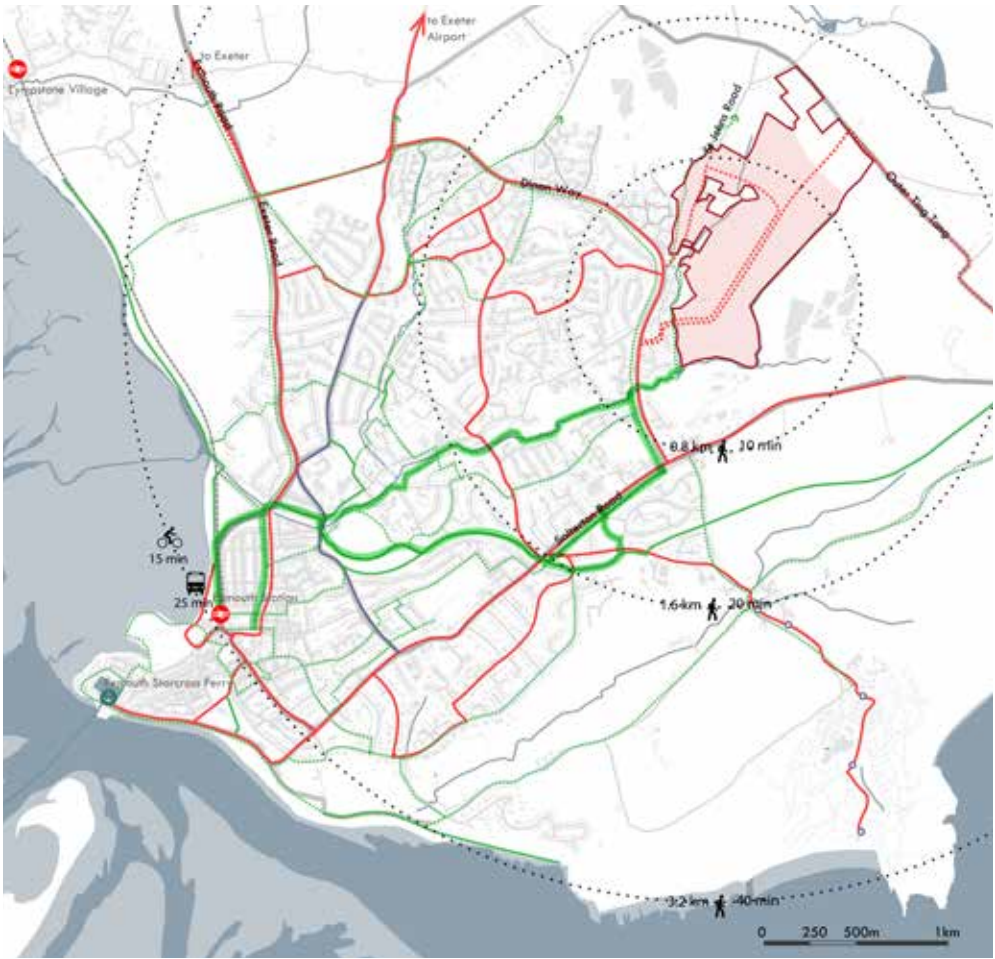
Whilst access by car will be facilitated, it is not the intention for it to be convenient. It is important that travel priority starts with excellent, attractive and direct active travel links and finishes with the accommodation of only essential car travel.

Easy access between the site and the town centre by non-car modes will result in increased spend, trade and activity in Exmouth's shops, businesses, clubs and facilities. An estimated population increase of c 1,800 additional people, with a diverse demographic, will help to sustain a successful town centre and district economy.



Active commute and more sustainable types of transport

Connections to existing public transport and cycle routes



- Bus routes (existing)
- Bus routes (proposed/diversion)
- Cycle routes (existing)
- Cycle routes (proposed as a part of the Strategy for Cycle Routes in Exmouth)

Cycle routes

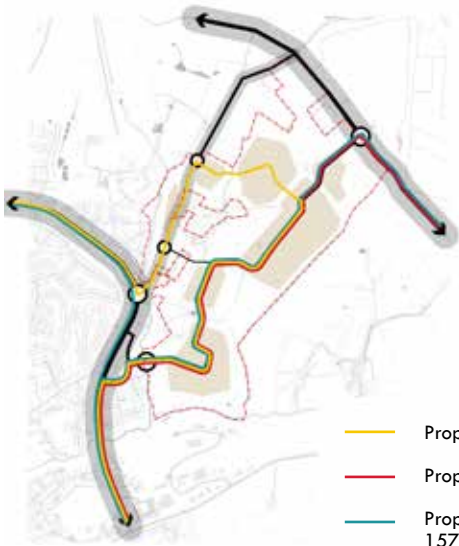


Cycling

The site provides potential to tie into the current and future cycle infrastructure such as the existing National Cycle Network Route 2 along Salterton Road or the proposed Withycombe Valley Route identified within the Exmouth Neighbourhood Plan which could provide a more direct active travel corridor from the town centre to the site. Furthermore, there were historic aspirations to take this route well beyond Dinan Way, continuing beyond Veiges Farm towards the Common, a section which passes directly through the site which could be implemented alongside any proposals.

The prospect of implementing a high quality and direct active movement corridor will benefit both residents within the site but also existing residents within Exmouth Town. By connecting into the existing cycle network, direct cycle links can be provided to larger transport interchanges such as Exmouth railway station which provides direct links into Exeter.

Access to public transport



Such measures will ensure that any traffic impact on either St John's Road or Southern Wood can be managed and suppressed such that these points of access may form secondary traffic routes, ensuring that trips by car will remain unattractive when compared to high quality active travel corridors towards the town centre.

Bus travel

The southwestern edge of the site already benefits from close proximity to a range of existing bus services. There is also the potential for these routes to be diverted into the site in the future. The creation of an access onto the B3179 also provides alternative future route options, either diverting to or from Dinan Way or by utilising the B3179 access to allow routes to enter or exist to the north. Of particular note are the existing 15 minute frequency service provided by route 87 and the half hourly services provided by routes 157/357, either of which could represent a regular public transport offering for the site.

St John's Common

“A place that puts you in touch with nature. Fresh air, tranquil walks, and a place to build relationships”

St John's Common is the physical and social heart of the community. This naturalistic common respects the setting of St.John's church and places

it as a centre piece of a new community core with a work hub and community building integrated within new residential areas.

The new parkland includes a network of walking routes that connect into the wider landscape for residents and the existing community to enjoy.

Development clusters are perched on the edge of the common with safe connectivity promoting accessibility to local facilities including a Work Hub to encourage an enterprising community to emerge on site.



St John's Village Core

“A place to meet your neighbours for a cup of coffee and support local producers at the weekend farmers market.”

Each cluster has a central square that promotes the village identity and a sense of community spirit among residents.

The Village Core is the largest square and accommodates a diverse programme of seasonal activities to bring the community together.

A cafe and local convenience store activates the ground floor around the Village Square to animate the space,

promoting safety and security.

Wide pavement and cycle lanes along the Causeway support a pedestrian and cycling friendly environment.



St John's Woodland Village

A place to belong

Vision Addendum

Response to request for further information
from East Devon District Council



October 2024

Executive Summary

This Vision Addendum has been prepared in response to East Devon District Council's request for further details on deliverability concerning **Transport** and **Heritage**. The key points below summarise how St John's Woodland Village addresses these aspects:

Transport

- Access from St John's Road and Southern Wood/ Meadowview Road will prioritise active travel and public transport, making walking and cycling the preferred choice for local trips.
- Limiting car access via the B3179 in later development phases will reduce traffic impacts on Exmouth town centre.
- Enhancing access to public transport by integrating bus services along Dinan Way with potential extensions through the site.
- Support modern living with work-from-home options, active travel links to employment, safe and convenient access to schools via foot and cycle and nearby parkland for leisure.

Heritage

- Enhancing historic woodlands and orchards with supplementary planting to provide screening, boost biodiversity, and integrate St John's Woodland Village into its landscape.
- Preserving St John's Road as a quiet country lane by limiting access to residents, landowners, cyclists and pedestrians, with informal tracks for non-vehicular use.
- Protecting the Grade II* listed St John in the Wilderness as a landmark, with its setting preserved through sensitive design and planting.

This addendum demonstrates that St John's Woodland Village offers a deliverable solution, directly meeting East Devon and Exmouth's housing needs.

For more detailed information on the Planning, Transport and Heritage Strategies, please refer to the technical reports by Collier Planning, SLR and Alan Baxter Ltd appended to this document.

Planning Strategy

The landowners will work collaboratively with East Devon District Council, Devon County Council, Exmouth Town Council and all key stakeholders to identify key infrastructure requirements for delivering a sustainable new neighbourhood at St Johns Woodland Village, Exmouth.

Exmo_20, sits outside of the nationally important National Landscape and is unconstrained by other local planning policy designations such as the Green Wedge, Coastal Preservation Zone and Heritage Coast. It also sits entirely within Flood Zone 1, categorised as being at the lowest risk of flooding. Consequently, the site performs

extremely well, when appraised sequentially alongside alternative potential site allocations.

An allocation of the site within the emerging East Devon Local Plan will provide a unique opportunity to ensure that all the key requirements for best practice place-making can be identified and planned for holistically to meet the needs of Exmouth over the plan period, with sustainability as the key objective. The landowners wish to work with the District Council to agree how the allocation policy can secure a comprehensive and coordinated approach to the development of the site. Such a policy could look like this:

Policy EXMO_20: St Johns Woodland Village, Exmouth

Within the area identified on the Policies Map as St John's Woodland Village, Exmouth, a new sustainable neighbourhood will be delivered. A comprehensive and coordinated approach to development will be required. Any planning application will need to be accompanied by a masterplan and phasing strategy which should be landscape led and include:

- Phased delivery of around XX new homes, including XX% to be affordable homes;
- A new mixed-use local centre comprising a convenience store, other compatible Class E uses and a community use building.
- Land reserved (approx. XXha) for a primary school with pre-school facilities [subject to discussions with DCC];
- Multi-functional green space (including; allotments, children's play, recreational areas, amenity space) in line with the relevant standards;
- Areas of created or enhanced habitat to enable populations of those European protected species recorded on site to be maintained and a minimum of 10% biodiversity net gain achieved;
- An integrated approach to landscape, drainage, biodiversity and the provision of open space;
- Vehicular access to the southern phase (phase 1) only from Southern Wood and to all other phases from the B3179. Reducing traffic impacts on Exmouth town centre by strategically limiting car access via the B3179 in later development phases.
- Masterplanning designed to minimise private car access from the new neighbourhood to the existing residential areas but maximise pedestrian and cycle links between the existing residential area and the proposed new neighbourhood through provision of connected streets designed to be suitable for cycling and walking and, where appropriate, additional measures to ensure that cycling and walking are safe and attractive means of transport
- Provision of direct and safe walking routes to access existing bus services on Dinan Way and allowance for future provision of new local bus services within the development;
- Appropriate, proposed mitigation measures sufficient to avoid or minimise and mitigate harm to nearby heritage assets by strengthening the area's historic woodlands and orchards with supplementary planting to provide natural screening, enhance biodiversity, and integrate St John's village into its landscape.
- Preserving the historic character of St John's Road as a quiet country lane by limiting access to the church and graveyard, residents, landowners, cyclists, and pedestrians, exploring opportunities for informal tracks extending into the surrounding landscape for non-vehicular use.
- Protecting the Grade II* listed St John in the Wilderness as a central community landmark, with its historic setting respected through sensitive design, screen planting, and access via pathways across open fields to maintain its tranquillity and rural charm.

Transport

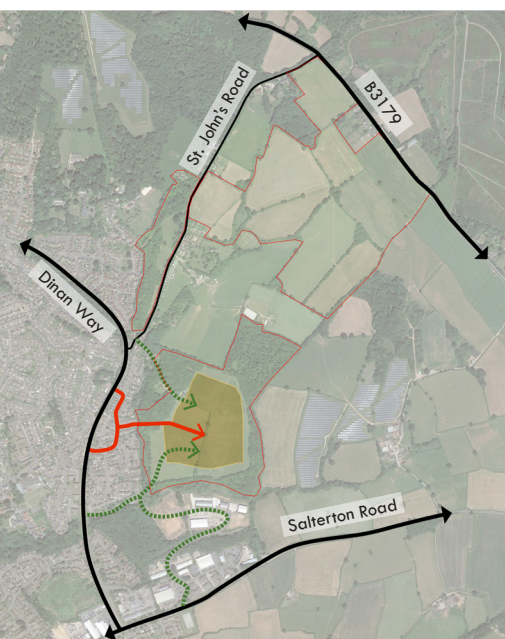
The Transport and Mobility Strategy for St John's Woodland Village has been commissioned from Transport and Mobility Consultants, SLR. It has been designed to promote sustainable, active travel and connectivity, supporting a modern, self-contained community. Improved access to Dinan Way at the western edge of the site could prioritise walking, cycling, and public transport over private car use, creating a natural preference for sustainable travel modes. Key enhancements include upgrading existing footpaths, such as the one alongside Ashfield Close, to shared pedestrian and cycleways, improving footways and cycle lanes along Southern Wood/Meadowview Road, and re-prioritising St John's Road by downgrading it to local access only, favouring walking and cycling.

Connectivity beyond the site is central to the strategy, linking St John's Woodland Village with nearby schools, shops and commercial uses on Salterton Road, Liverton Business Park, and the Hillcrest Community Nature Reserve. Future connections will also facilitate access to the Exe Estuary Cycle Trail and Exmouth town centre, forming part of an east-west active travel corridor. Public transport options could be prioritised through potential bus gate installations at Southern Wood and/or Liverton Business Park, which would

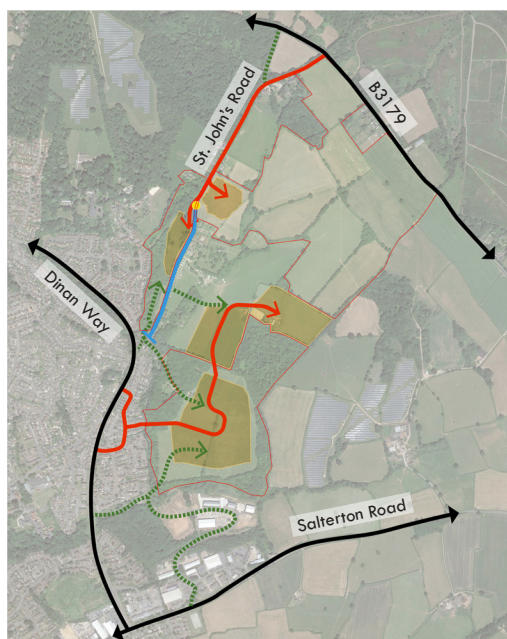
restrict car access. Current bus services, such as the 58/58A routes along Dinan Road (connecting Exeter and Exmouth) and the 99 service (linking Brixington and Exmouth), already provide excellent frequency. These services could be extended or diverted through the development, increasing overall accessibility and offering frequent, convenient travel options.

Devon County Council's planned completion of the Dinan Way extension to the A376 will further boost connectivity, with Summer Lane's closure to through-traffic and a new shared pedestrian and cycle path enhancing safe, active travel routes. Car access will be strategically restricted, primarily via the B3179, ensuring pedestrians and cyclists have the most direct routes making active travel options the most appealing mode of travel. This approach will create a sustainable, easily navigable environment within St John's Woodland Village.

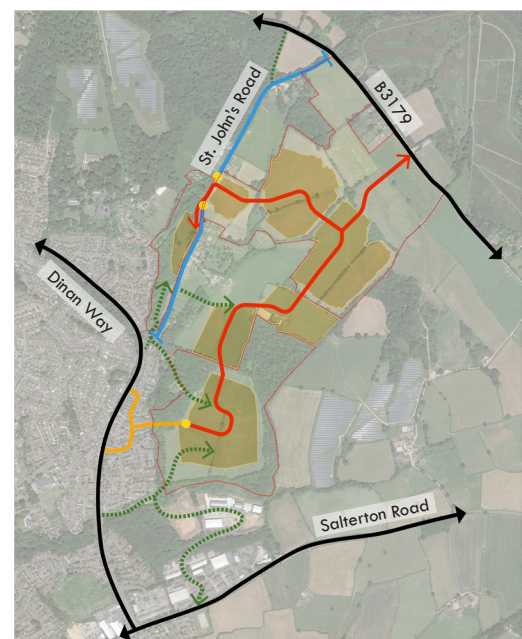
The reader is directed to 'Technical Note: Vision Led Transport Impact Summary' by SLR for further information.



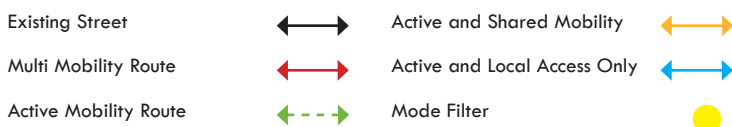
Phase 1



Phase 2



Phase 3



Heritage

This heritage overview, commissioned from Conservation Specialists, Alan Baxter Ltd, outlines how the proposed development respects the historic character of St John's Woodland Village, ensuring new communities integrate with the landscape, woodland, and historic landmarks.

A contemporary woodland village

The area's historic landscape is characterised by woodlands and orchards, sections of which survive today. Supplementary planting will strengthen these areas of woodland and provide screening and biodiversity, as well as augmenting St John's as a village sensitively embedded within its landscape.

An active, well-connected place

St John's Road has long existed as a quiet country lane, defined by tall hedgerows and mature trees. Farm tracks lead from this road across open fields. The aspiration is to retain its historic identity as a lane by limiting its use to only residents; landowners; cyclists; and pedestrians. Routes which lead away from the lane across open landscape would be informal 'tracks' for cyclists and pedestrians, upholding the landscape as one devoid of vehicles.

A strong community embracing heritage

The Grade II* listed St John in the Wilderness has a long history in providing a place to worship and convene for the local community. The Church can once again be used as a place to convene for a new community, which would support its long-term use, maintenance and care. Furthermore, its churchyard will be accessed from the development along pathways across open fields, retaining the church's historic isolation and tranquillity and the sense of making a journey towards the church through open landscape.

Respecting the setting of the church

The proposed design incorporates mitigation measures within its approach. For example, a distinctive feature of the church is its rural setting, which will be carefully respected by the development, with additional screen planting enhancing the natural surroundings and minimizing glimpsed views. Detracting agricultural buildings that neighbour the site could also be removed to further preserve the church's character.

The reader is directed to 'Technical Note: Historic Environment' by Alan Baxter Ltd for further information.



Key Messages

1. Provision of a strategic buffer between proposed development and St. John in the Wilderness.
2. Creation of a village common, as part of the strategic buffer. Pathways across open fields will provide access to the churchyard preserving the church's historic isolation and tranquillity.
3. Restoring the historic tree corridor and recommending removal of farm/modern buildings to allow additional planting.
4. Incorporation of planting to parts of the proposed residential edges to mitigate the impact of views from the church.
5. Creating carefully filtered visual links between the church and key destinations within the site including the community hub and the village core.

Illustrative Masterplan

Potential Woodland Recreational Area (Land within landowners' ownership)

- Escape to nature



St John's Common

- Signature village green
- Historical church with picturesque graveyard



Artisan Cluster

- Workshops and art studios



Start of the Nature Trail

- Gateway to AONB



Woodland Cluster

- Cluster completely surrounded with woodlands and ponds



The updated illustrative masterplan includes minor amendments to the landscape, made to further mitigate any heritage impacts. These subtle adjustments ensure that St John's Woodland Village remains sensitive to its historic surroundings while continuing to promote a sustainable, well-connected community.

St John's Orchards

- Fruit trees and productive landscape
- AONB views



Village core

- Working hub
- Cafe



Community hub

- Primary school
- Community building



St John's Woods

- Retained woodlands
- Crafts and playgrounds



The Causeway

- Contemporary community hub



0 10 50 100 200 500



Eagle Investments (SW) Ltd

St Johns Woodland Village – Vision-led Transport Impact Summary

SLR Project No.: 205513

2 October 2024

Revision: V2

1.0 Introduction

- 1.1 St John's Woodland Village provides an excellent opportunity for the allocation of a new community that allows for the application of exemplar land use, health and mobility planning principles. The individual nature of the site allows these impacts to be managed through a phased access strategy that would be difficult to replicate elsewhere within the town and on this basis, the site represents a clear and compelling opportunity for allocation.
- 1.2 SLR Consulting has been instructed by Eagle Investments (SW) Ltd to provide professional transport advice in connection with the promotion of mixed-use development on land east of Exmouth, which is being promoted through the East Devon Local Plan. This Technical Note (TN) sets out the proposed vision-led approach, which seeks to mitigate external traffic impacts through a mix of placemaking and mobility interventions. In assessing the potential impact resulting from a vision-led approach, consideration has been given to the delivery of approximately 750 new homes, using the SLR Vision Led Planning Tool.
- 1.3 SLR has been advising organisations on policy direction and best practice in relation to mobility, placemaking, the climate emergency and net zero carbon, and the work we are doing on Vision-led Planning puts us in a unique position to understand contemporary development planning and how planning applications should be considered with the backdrop of recent policy changes.
- 1.4 St John's Woodland Village is a unique opportunity to link and enhance the facilities within the town, with a focus on an active travel first approach to movements within and beyond the new settlement. Principally, using the western boundary as an interface with the town, access by active and public/shared travel will be prioritised over the car, to the extent that car access will be pushed to the periphery of the development to protect key active travel links. The principal access will be formed onto the B3179, ensuring any routing to the local facilities by car will be circuitous and far less convenient than walking, cycling or shared mobility.
- 1.5 The site provides development of a scale that allows a range of complementary facilities within the site that will assist in both internalising trips within the site and localising trips within the wider area. The early phases of development can take benefit from the range of services within walking distance ensuring that infrastructure supporting active and shared

modes can be provided in step with development. The phased access strategy, specific to the sites location and characteristics, seeks to restrict vehicular access along the western boundary of the site, adjacent to existing residential areas, resulting in a development that will manage traffic impact in a manner that limits both the requirement for unnecessary road infrastructure but also limits any undesirable impacts on the existing community.

- 1.6 Connectivity through the site, through streets and parkland will prioritise active travel, and these will be the most direct route, with roads fitting around them. Priority will be given to pedestrians and cyclists at key junctions both within the site, alongside connections beyond.
- 1.7 St. John's Woodland Village anticipates approximately 750 new homes, with a residential population of approximately 1,800. The proximity to neighbouring schools and facilities located to the east of Exmouth town centre, such as the Liverton Business Park and neighbouring retail and leisure uses, will create a unique opportunity to support 20-minute living, minimising the need to travel and encouraging greater self-containment and active travel. The assessment set out in **Section 4** demonstrates the significant potential of the site to provide a sustainable new development based on a vision-led approach to planning and assessment.
- 1.8 This TN sets out the potential residential capacity and sustainable credentials of the site based on existing parameters, proximity to existing facilities, potential new community land uses and proposed placemaking and mobility interventions. The trip generation assessment contained within this TN comprises the potential land uses that could be considered to enhance the potential for local living and containment of travel, such as community hubs, schools, local shops, community space and leisure.

2.0 National and Local Policy and Guidance

National Planning Policy Framework (NPPF, 2023)

- 2.1 The National Planning Policy Framework (NPPF) sets out national planning policies for England and how they should be applied. The NPPF must be taken into account in preparing the development plan and is a material consideration in planning decisions.
- 2.2 In considering the St. John Woodland Village development, the following policy references, with respect to matters of transport and mobility, are considered pertinent:
- 2.3 The NPPF states at paragraph 110 that:

“Planning policies should:...

b) be prepared with the active involvement of local highway authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned... “
- 2.4 The NPPF states at paragraph 108 that:



“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.”*

2.5 The NPPF states at paragraph 109 that:

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”.

2.6 The NPPF states at paragraph 110 that planning policies should:

- a) “support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;*
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;*
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;*
- d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans); and*
- e) provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements.”*



Draft NPPF Consultation (2024)

2.7 Following the proposed NPPF updates, paragraphs 114 and 115 will focus on a ‘vision-led’ approach to transport planning. At present, planning for travel often follows a ‘predict and provide’ approach, which is now considered to be an inadequate approach with regard to the quality of places and the transport infrastructure to be put in place. The vision-led approach focuses on the outcomes desired and planning for achieving them. The vision-led approach sets a vision for how places should be and designs the transport and behavioral interventions needed to achieve this vision.

2.8 The NPPF draft text in the consultation document sets out the following vision-led policies:

“112. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) A vision-led approach to promoting sustainable transport modes is taken, taking account of the type of development and its location;*
- b) Safe and suitable access to the site can be achieved by all users;*
- c) The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision led approach”.*

Decarbonising Britain – A Better Greener Britain (2021)

2.9 In 2021 the Department for Transport (DfT) published ‘Decarbonising Britain – A Better Greener Britain’ as a follow-on document from ‘Decarbonising Transport: Setting the Challenge’, published in March 2020. The document lays out the scale of the additional reductions needed to deliver transport’s contribution to legally binding carbon budgets and delivering net zero by 2050.

2.10 The document details on page 29:

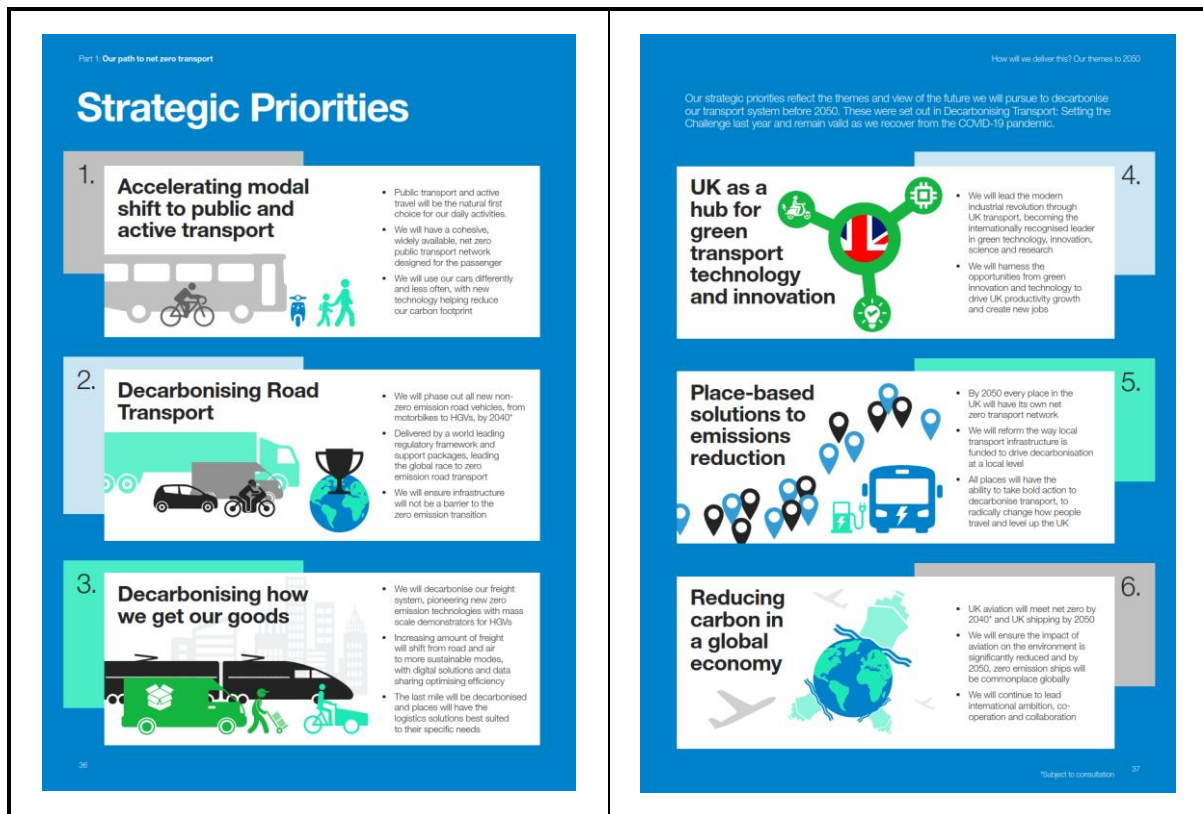
“As well as decarbonising private and commercial road vehicles, therefore, we must increase the share of trips taken by public transport, cycling and walking. We want to make these modes the natural first choice for all who can take them. We want less motor traffic in urban areas. Improvements to public transport, walking and cycling, along with the changes in commuting, shopping and business travel accelerated by the pandemic, also offer the opportunity for a reduction, or at least a stabilisation, in traffic more widely.

Increasing car occupancy and encouraging public transport use are two measures that can immediately cut transport’s carbon emissions. They will help tackle chronic road congestion, freeing up road space for those with no alternative but to drive.”

2.11 The strategic priorities on how to deliver the net zero reduction by 2050 is detailed below in **Figure 2-1**.



Figure 2-1: Decarbonising Britain Strategy Priorities

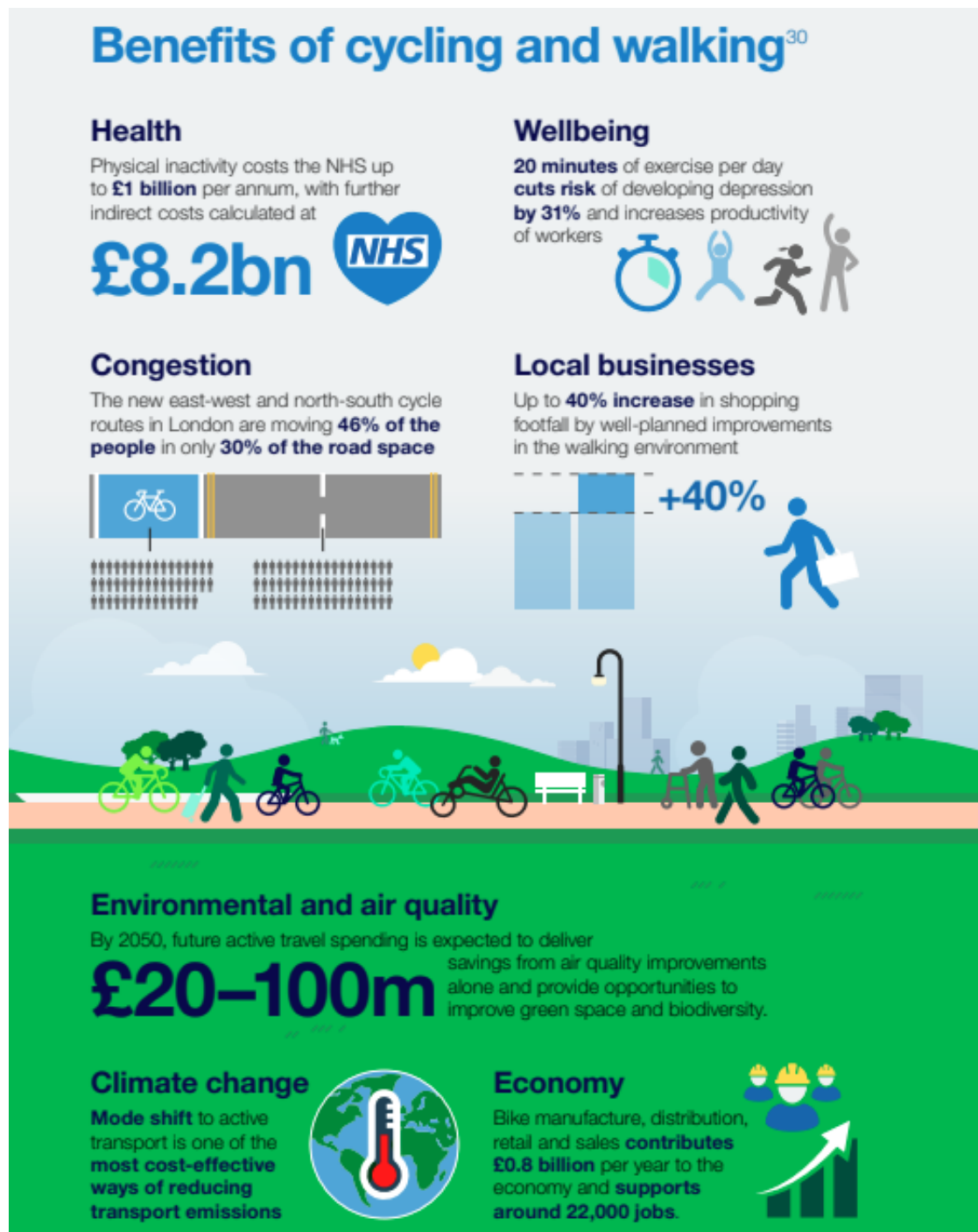


Courtesy: Decarbonising Transport: A Better, Greener Britain

- 2.12 In terms of sustainable and active travel, the document details within **Part 2a**, the benefits of walking and cycling on both the environment and mental health and wellbeing. The key facts are detailed below in **Figure 2-2** Error! Reference source not found..



Figure 2-2: Walking and Cycling Benefits



Courtesy: Decarbonising Transport: A Better, Greener Britain

- 2.13 Within the document, the need for ‘Place Based Solutions’ is highlighted at page 12 by stating:

“We will drive decarbonisation and transport improvements at a local level by making quantifiable carbon reductions a fundamental part of local transport planning and funding.”

- 2.14 A number of key place-based solutions are highlighted within this section (page 157-158) and are relevant to the scheme namely:



“Through good design and proper consideration of the needs of our communities, we can better connect people, making communities more accessible, inclusive, safe, and attractive as well as promoting the principles of 20-minute neighbourhoods. We are working with the Ministry of Housing, Communities & Local Government and the Local Government Association to place cycling, walking and public transport provision at the heart of local plan making and decision taking for new developments”.

Gear Change committed to establishing a new body, Active Travel England (ATE), to promote cycling and walking. One of its functions will be as a statutory consultee within the planning system to press for adequate cycling and walking provision in all developments over a certain threshold, and to provide expert advice on ways in which such provision can be improved

“Going forward, LTPs will also need to set out how local areas will deliver ambitious quantifiable carbon reductions in transport, taking into account the differing transport requirements of different areas. This will need to be in line with carbon budgets and net zero”

“As of February 2021, over 70 per cent of local authorities had declared the urgent need to act on the causes and impacts of climate change. To support turning these declarations into action plans to reduce GHG emissions from transport, Government will publish a toolkit of guidance and information to help local authorities build business cases, develop innovative sustainable transport policies”.

- 2.15 To aid local authorities in the above, a Local Authority Decarbonisation Toolkit was published in 2021 to provide guidance to support local areas to deliver more sustainable transport measures. Further details are shown at **Figure 2-3**.

Figure 2-3: Local Authority Toolkit



2.16 The toolkit detailed above displays the need for local authorities to act on the causes and impacts of climate change. With placemaking being a key parameter in enabling a carbon reduction.

2.17 Moreover, Vision and Validate is set out at page 158 as detailed in the following:

“We recognise that the government has a role in helping Local Planning and Highways Authorities to better plan for sustainable transport and develop innovative policies to reduce car dependency. We need to move away from transport planning based on predicting future demand to provide capacity (‘predict and provide’) to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (sometimes referred to as ‘vision and validate’). We will continue to work with MHCLG to identify how we can best support local authorities to develop innovative sustainable transport policies as part of the planning process, how this can be used to better assess planning applications, and better monitor local transport outcomes to deliver on our ambitions for sustainable transport use”.

2.18 This demonstrates that there is clear support from the government for the vision led approach to transport planning. Current planning practices are largely based on the ‘predict and provide’ approach and it is considered that a vision-led approach better supports placemaking and a community led vision while delivering on carbon reduction targets.

RTPI Net Zero Transport: The role of spatial planning and place-based solutions (January 2021)

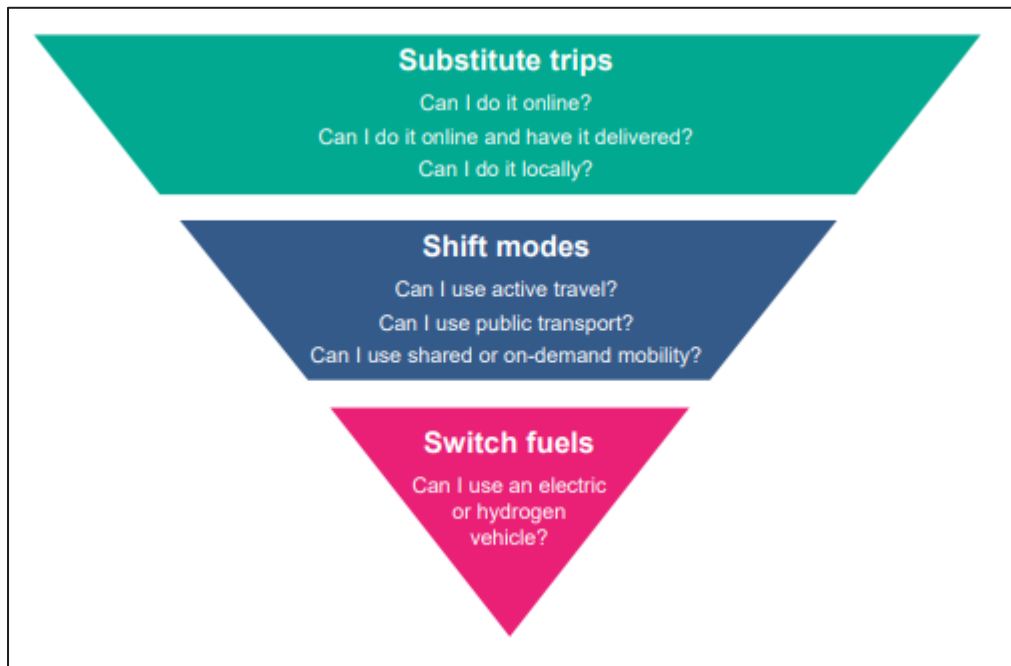
2.19 The research paper details how places can achieve an 80% reduction in surface transport emissions by 2030 with the ambition of reaching net zero by 2050. Vectos, now part of SLR, was a co-author of this research study alongside LDA Design and City Science.

2.20 The research identified that potential interventions could be utilised to reduce surface transport emissions including “measures to facilitate greater uptake of walking, cycling and public transport provision, and spatial planning measures to reduce travel demand and encourage behaviour change”.

2.21 The Sustainable Accessibility and Mobility (SAM) Framework was developed specifically for this report and champions the idea that a place-based approach should be applied to masterplanning and assessment to achieve net zero transport. The approach calls for measures that focus on the role of place and reducing or localising trip making before considering how to increase the uptake of sustainable travel modes. The SAM Framework is shown at **Figure 2-4**.



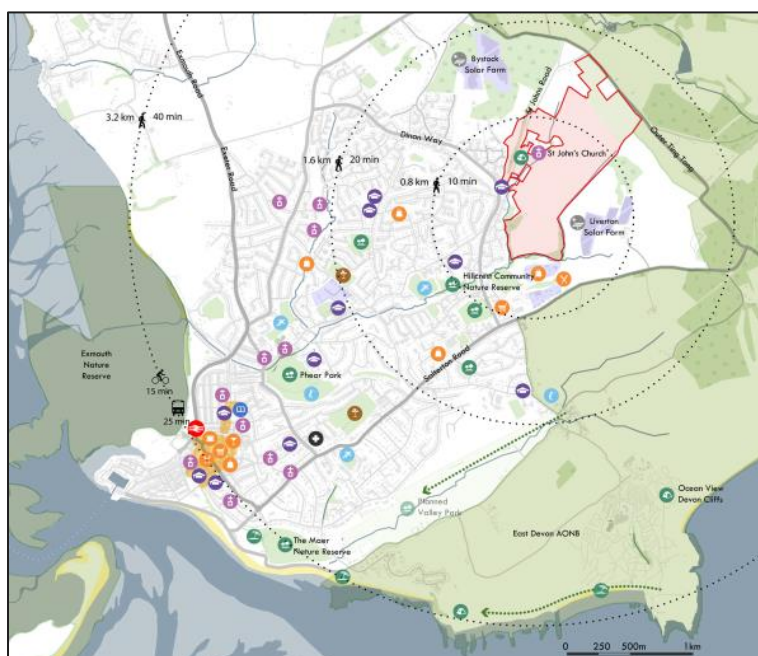
Figure 2-4: SAM Framework



3.0 Existing Situation

- 3.1 The site is situated in a sustainable location, with access to Exmouth town centre within a short cycle distance, or by public transport. Exmouth offers a wide range of facilities conducive to local living.
- 3.2 The site's location facilitates a natural extension of Exmouth, presenting a unique opportunity to encourage town wide travel behaviour change, through active travel routes and promotion of sustainable travel for new and existing residents, alongside an improved mix of land uses.
- 3.3 **Figure 3-1** illustrates the amenities in proximity to the site, identifying a range of facilities within a 20min walk of the site, including the Liverton Business Park, neighbouring retail and leisure uses and choice of local schools, presenting the unique opportunity to form an extension to the existing surroundings and allowing any future development to benefit from these facilities from day one.

Figure 3-1: Facilities Accessible within a 10-minute Walk



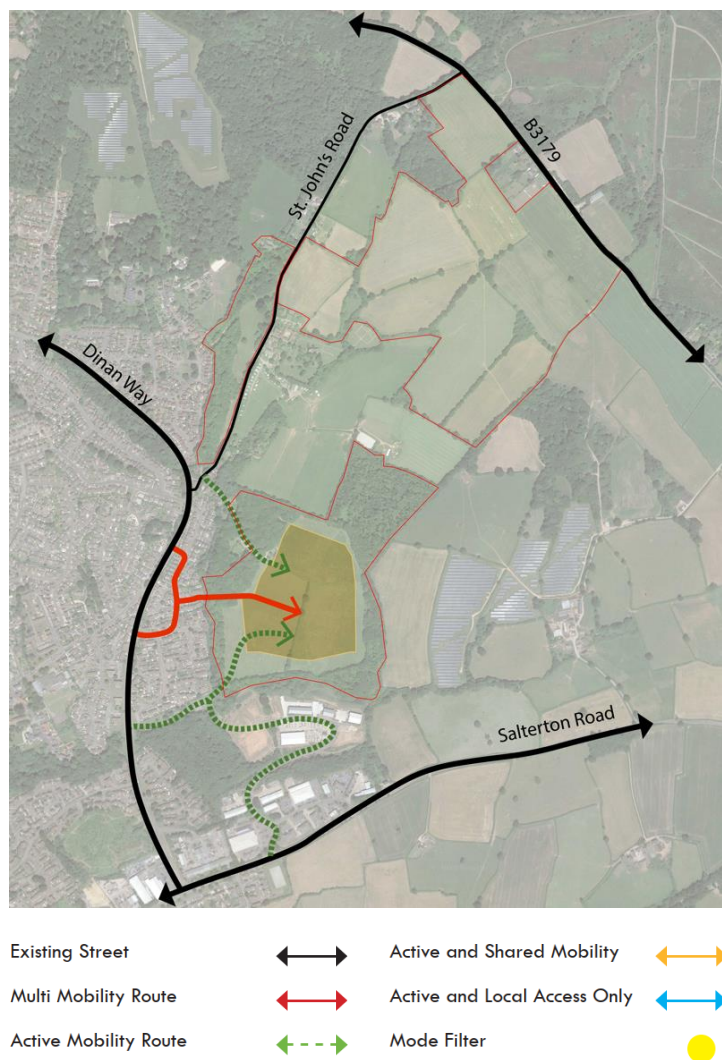
- 3.4 The site's proximity to schools, shopping, and public transport will deliver growth in a coordinated and sustainable manner, with positive travel choices from the outset and through the life of the development. Access to established active travel infrastructure and public transport, connects the site to the excellent provision of facilities in Exmouth, meeting the primary needs of future residents within walking distance and facilitating local living. Therefore, the site aligns with paragraph 114a of the NPPF, ensuring that opportunities to promote sustainable modes of transport can be taken up.



4.0 Access Strategy

- 4.1 A phased access strategy for the site will ensure that infrastructure can be provided in step with development in a manner that ensures that early phases can come forward in a controlled manner, with the mobility strategy evolving over the course of construction. During the earliest phase, access can be achieved from the southwest for up to 300 dwellings, via the existing residential estate roads of Southernwood and Meadowview Road. The extent of adopted highway at the end of Southern Wood directly abuts the site boundary, providing opportunity for highway access (including pedestrian and cycle access) to the site, facilitating a direct connection between the site and the built-up area of Exmouth and its facilities.

Insert 4-2 – Phase 1 Access Strategy



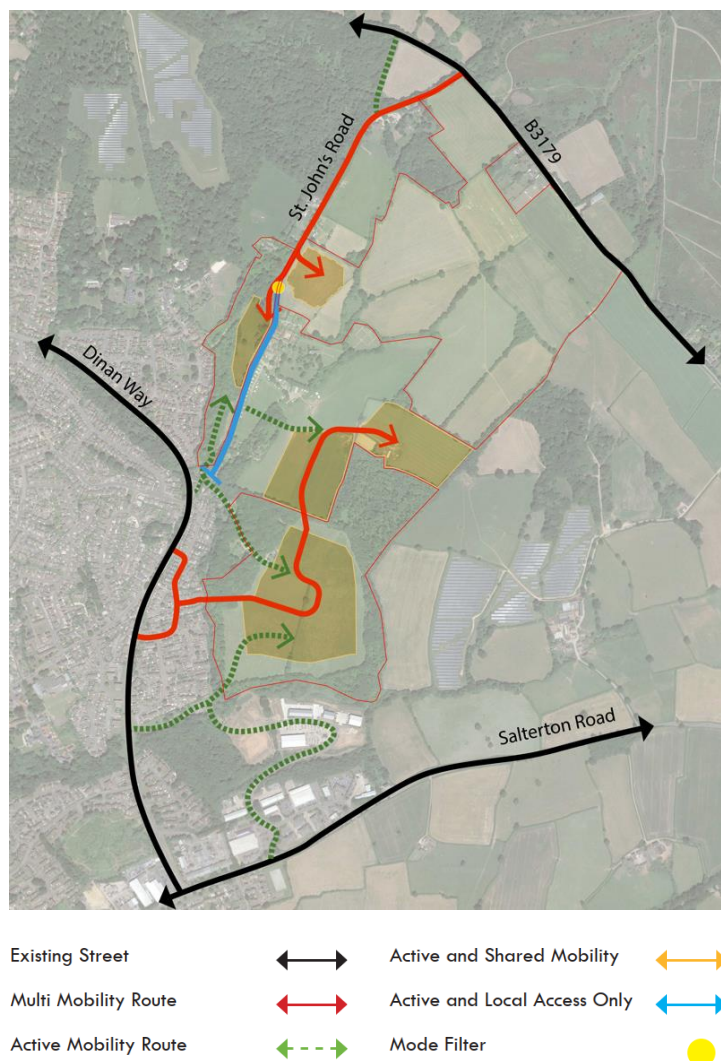
- 4.2 Southernwood is approximately 6m wide and accommodates some existing on-street parking. Initial considerations of the quantum of development that could be achieved from



this access would suggest that sufficient capacity would be available to serve the earliest phase of development, with the intention that across the life of the development, this access would evolve to support the mobility strategy for the site that seeks to create active travel connections across the southwest boundary with vehicular access achieved to the northeast.

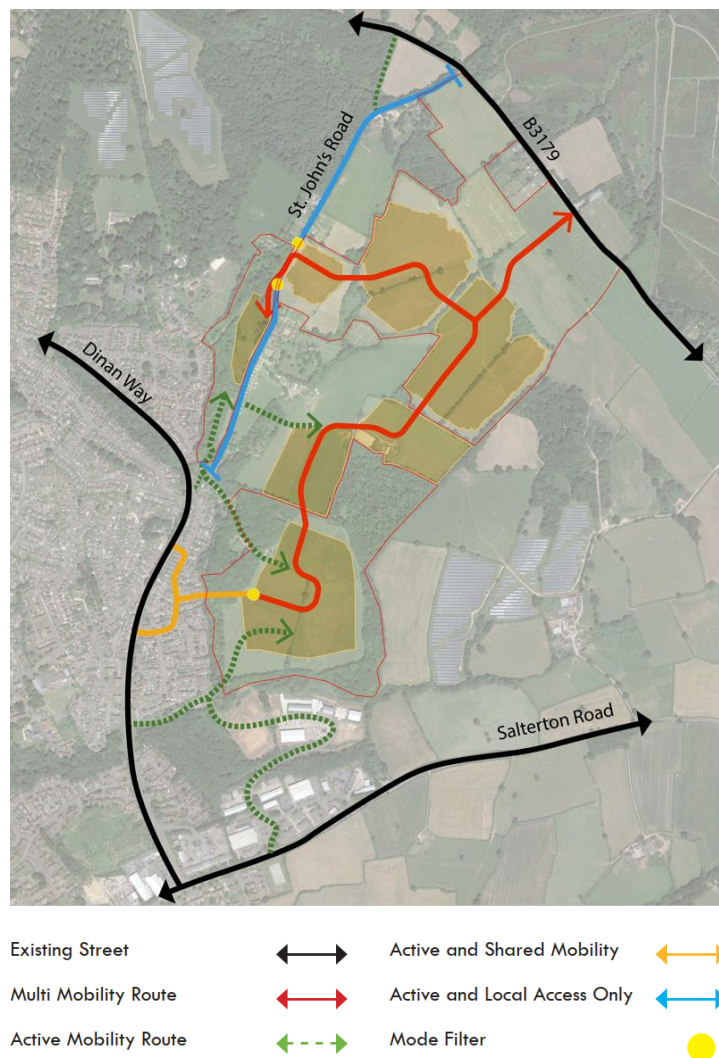
- 4.3 During subsequent phases, additional points of access could be achieved via St John's Road, allowing discrete levels of development to be served whilst protecting the existing character of St John's Road with the creation of a modal filter, removing through traffic but continuing to facilitate local access requirements.
- 4.4 To ensure infrastructure requirements can be provided in step with development during this intermediate stage of development, a level of traffic will be facilitated from St John's Road to the north, mindful of shared use principles that may limit the level of development that would be accessed from this point, until the final mobility strategy for the site can be implemented.

Insert 4-2 – Phase 2 Access Strategy



- 4.5 Once the development is complete, the final mobility strategy can be implemented. This will direct vehicular traffic towards the B3179, ensuring that connections to the southwest are reserved for active and shared mobility connections only, whilst all development traffic will be removed from the length of St Johns Road, creating a Quiet Lane which only facilitate local access requirements. Access to the western parcel will need to cross St John's Road at an appropriate point, with the introduction of further modal filters to prevent both development traffic and through traffic traveling along this road.

Insert 4-3 – Phase 3 Access Strategy



5.0 Vision Led Approach - Trip Generation

Methodology

- 5.1 A Vision-led approach is a modern transport planning method. It is applied by SLR Consulting and supports the net zero carbon policies of Local Planning Authorities and the UK Government. It can also promote the ESG objectives of developers and masterplanners.
- 5.2 The Vision-led approach considers the vision for a new community, and then considers the mobility and placemaking interventions to help realise those conditions. These interventions and broader policies are validated by calculating their impacts and applying them to the transport modelling. The aim is to maximise the number of trips that are internalised or contained within the development or local community, significantly reducing the need for private vehicle movements both internally or externally and mitigates carbon emissions whilst encouraging active travel modes.
- 5.3 The Vision for a new settlement might include the objectives (with quantifiable targets) of healthy, safe, quiet, clean, resilient, low carbon, vibrant communities, with good air quality and green spaces. Fundamental to this is to create well designed, pedestrian friendly, developments that support local living and achieve lower levels of car use. This can be realised through 20minute neighbourhood principles, provision of local amenities and street design that affords space to people rather than vehicles.
- 5.4 Vision Led Planning is a new principle, and many authorities and government organisations are grappling with how to assess schemes against the Vision-led requirements. SLR have been advising organisations such as Homes England, DfT, RTPI amongst others on how this is achieved.
- 5.5 SLR's Vision-led Planning Tool utilises data from the Census, Office for National Statistics (ONS) and the National Travel Survey (NTS) to validate the proposed trip generation of the site. The tool draws on existing conditions at the site including land use, distance to key amenities and mix of dwellings, providing guidance and trip outputs based on the amenities that exist or are proposed and which could deliver local living potential. A detailed description of the Vision-led Planning Tool is available at **Appendix A**.
- 5.6 Principles of Vision-led planning including disaggregation by journey purpose and general agreement of the approach have previously been agreed with local authorities and consultation with National Highways. Within paragraph 15 of the DfT Circular document, it is noted that transport planning should move away from the traditional 'predict and provide' approach to deliver a vision-led outcome such as the 'Vision and Validate' approach, an approach that is now recognised and accepted by National Highways.
- 5.7 Due to the nature and scale of the site, it is considered that the vision-led approach would provide a more accurate representation of future trip movements, by all modes. A comprehensive exercise to derive a total trip generation has been undertaken, based on credible and reliable data sources. The trip generation exercise begins with identifying the existing amenities and those proposed that are viable for developments of the proposed scale, shape, location and character. Selecting the amenities based on this assessment allows the



forecasting of realistic levels of residential trip internalisation and containment that account for the proposed on-site amenities such as education, leisure and retail uses and proposed jobs.

Assessment

5.8 The Vision-led Planning Tool has been run to assess the quantum of approximately 750 dwellings to establish the trip impacts accounting for contemporary assessment methods and placemaking potential, the following assumptions were made:

- **Area of development site:** 23.25 hectares
- **Average number of persons per dwelling:** 2.5
- **Distance to amenities (km):** distance taken from the middle of the proposed site;
- **Employment:** 36 on-site jobs to be provided; and
- **Working from home rates:** Set at 0.25% increase per annum up to 2040.

5.9 In addition to the above parameters, the following interventions have been applied:

- Strengthen public transport connections for external trips;
- Active travel corridor for commuter trips;
- Carpool scheme for commuter trips; and
- Improve attractiveness of walking environment within the development.

5.1 It should be noted that the model indicates the amenities that should be included on the site based on existing census data and the number of proposed dwellings. As such, the following parameters were applied and reflect those that could reasonably be brought forward alongside the development to enable local living and containment of travel, although these are not fixed at this stage:

- Convenience Store;
- Bars / Pubs;
- Community Hall / Hub;
- Primary School (1 form entry).

5.2 The SLR Tool provides hourly and daily trip generation for 'all trips' and 'car trips'. The new development car trip rates following placemaking and mobility interventions derived from the Vision-led Planning Tool are presented below in **Table 5-1**.

Table 5-1: 750 Dwelling Driver Trip Rate (Vision-led Model)

Time Period	External Residential Vehicle Trip Rate		
	Arrivals	Departures	Total
0800-0900	0.05	0.15	0.20
1700-1800	0.16	0.07	0.24



- 5.3 As demonstrated within **Table 5-1**, trip rates generated by the model produce external trip rates of 0.20 in the AM peak and 0.24 in the PM peak.
- 5.4 Using the trip rates in **Table 5-1**, and the external trips attracted to the amenity included in the Vision Led Planning Tool, the proposed development trip generation have been produced and can be seen in
- 5.5 **Table 5-2.**

Table 5-2: Overall Trip Rates and Forecast Trips (including External Attraction)

Time Period	External Vehicle Trip Rate		
	Arrivals	Departures	Total
Residential External			
0800-0900	35	115	150
1700-1800	125	54	178
External Attracted to Amenity			
0800-0900	5	5	10
1700-1800	5	6	11

- 5.6 As shown in
- 5.7 **Table 5-2**, the proposed site will generate 160 two-way external vehicle trips in the AM peak (08:00-09:00), and 189 two-way external vehicle trips in the PM peak (17:00-18:00). This equates to an additional two vehicle trips and three vehicle trips per minute in the AM and PM peaks, respectively.
- 5.8 The following section sets out predicted traffic impact attributed to the Goodmores development (14/0330/MOUT) which was submitted in 2014 using a historic Predict & Provide approach based on TRICS forecasts in contrast to the Vision-led approach that considers the potential for trip internalisation and the propensity for residents to undertake a variety of journey purposes by sustainable means. A Transport Assessment was submitted alongside the application at that time, applying the historic approach to traffic impact assessment, with similarities in terms of the wider locality of the development, situated on the outer edge of Exmouth.

6.0 Predict & Provide

- 6.1 Traditionally, the industry standard practice for determining the trip generation resulting from new developments is to use data from the TRICS database to determine the anticipated person and vehicular trip generation (or trip rates) of a proposed development based on recent traffic survey data for comparable sites across the country (Predict & Provide). This is a backward-looking approach, specifically it produces a level of traffic based on historic sites that bear little or no similarity to Vision-led principles.



- 6.2 There is a clear weakness of this approach when considering larger development sites (>500 dwellings) where radically different designs and strategies can have a significant impact on reliance of the car and take up of alternative modes.
- 6.3 The TRICS approach relies on the TRICS database containing a number of comparable sites as the basis for estimating trips generated from the new site, however:
- There are very few residential sites within the TRICS database with >500 dwellings. Only three sites currently exist that were surveyed outside of COVID restrictions;
 - The level of amenity provision within these three sites is limited and variable. None reflect a vision-led planning approach that prioritises local amenity provision facilitating local living; and
 - Reducing the size of the site selection in TRICS to 200 dwellings and above would increase the number of sites, however, these smaller sites do not provide the level of amenity and serve provision that would be viable for a site over seven times this size.
 - This is always a backwards looking assessment based on previous (often less desirable) outcomes
- 6.4 In summary, there is no TRICS data that is comparable to the conditions and design of larger residential sites planned around vision-led principles. To demonstrate this point, the Goodmores development, which includes a proposed quantum of up to 350 dwellings (ref: 14/0330/MOUT), provides a useful comparison. The trip rates and corresponding trip generation outlined in its Transport Assessment were calculated using the historic TRICS database. The results of that assessment are presented in Table 6-1 having been undertaken in 2014.

Table 6-1: Accepted Trip Rates for Goodmores Farm (ref: 14/0330/MOUT)

Land Use	Vehicular Trip Rates			
	AM Peak		PM Peak	
	Arrive	Depart	Arrive	Depart
Private Housing (per dwelling)	0.151	0.459	0.427	0.231
Affordable Housing (per dwelling)	0.127	0.325	0.325	0.196
B1 Office (per 100sqm)	1.289	0.153	0.117	1.02
B2 Industrial (per 100sqm)	0.472	0.092	0.043	0.353
GP Surgery (per 100sqm)	5.43	2.492	2.361	3.83
Local Centre (per 100sqm)	5.197	4.888	5.843	6.713
Primary School (per pupil)	0.272	0.183	0.017	0.031

- 6.5 As shown at Table 6-1, the previously accepted two-way vehicle trip rates for the Goodmores Farm development were 0.61 in the AM peak and 0.66 two-way vehicle trips in the PM peak.



- 6.6 **Table 6-2** shows a summary of trip generation applying the trip rates from TRICS (which was approved for the Goodmores development) to the development quantum for St Johns Woodland development.

Table 6-2: Trip Generation for St Johns Woodland Development using Trip Rates from Goodmoores Farm

Time Period	External Vehicle Trip Rate		
	Arrivals	Departures	Total
0800-0900	113	344	458
1700-1800	320	173	494

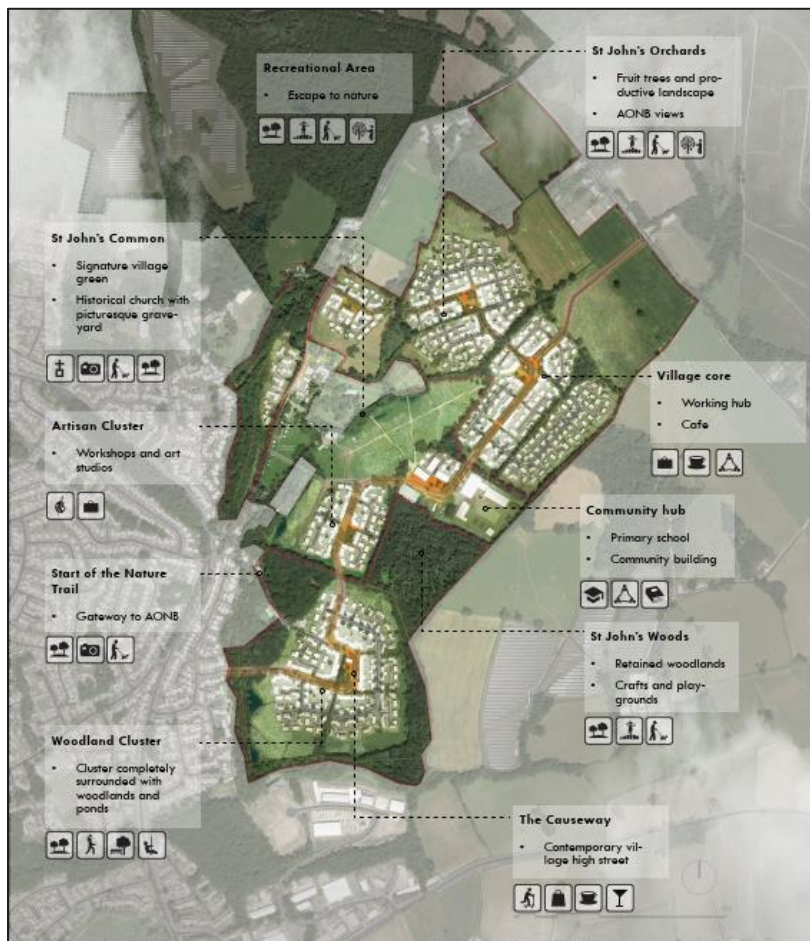
- 6.7 In reality, this level of traffic was unlikely to materialise and would have been a gross overestimation of traffic impacts. Notwithstanding this, it can be seen that by undertaking a TRICS based assessment there is a significant risk that the impacts of the proposals on the wider highway network are over-estimated and in so doing significant costs are incurred in providing unnecessary road infrastructure when this would be better directed towards a comprehensive mobility strategy that can be provided in step with development, focusing investment on placemaking and active travel interventions that have much broader social benefits.

7.0 Placemaking: Future Potential

- 7.1 As previously set out within this report, the proposed trip rates are generated using the Vision-led model which utilises factors including existing and proposed facilities, modal split and proposed mobility interventions.
- 7.2 Based on the output of the vision-led assessment for approximately 750 dwellings compared to the traditional TRICS assessment, external trip rates could be significantly reduced through the provision of internal site amenities. **Figure 7-1** depicts the potential on-site facilities that could be available within the St. John's Woodland Village scheme.



Figure 7-1: On-site Facility Provision



- 7.3 The vision-led assessment utilises existing census, NTS and ONS data to determine the dwelling threshold required for viable amenities. It calculates which amenities should reasonably be provided within the development to allow residents the opportunity to walk or cycle to key local amenities as part of the wider placemaking vision. As such, the development could provide a wide range of facilities to encourage local living and containment of travel, improving walkability for future residents and providing key facilities to decrease the need for travel via private car.

Mobility Strategy

- 7.4 Mobility is a function of placemaking and is about accessing day to day facilities such as schools, shops, family and friends, healthcare, and the workplace are catered for in proximity to the site, thereby localising travel and enabling local living. Strategic sites such as St John's Woodland Village will allow for a planned and coordinated approach to development, taking maximum benefit from local facilities to serve day to day journey purposes and ensuring provision of effective and comprehensive mobility infrastructure to promote active and shared modes over the car, where wider travel is necessary. The aim of this approach is first and foremost to reduce the need to travel by localising movement and offering a range of choice in how to travel.



- 7.5 The site has excellent access to local transport infrastructure including bus services accessible by foot and cycle. This represents a significant opportunity to enhance existing infrastructure to enable local living and a 20-minute place.
- 7.6 The St. John Woodland Village vision focuses on walkable neighbourhoods that facilitate local living, while opening up exceptional access to the already well-established bus and rail network, offering opportunities to significantly increase occupancy levels and boosting investment potential in shared travel opportunities, where this is rail enhancement, increased bus service and frequency or investment in new shared transport technology, such as demand responsive transport, or connected autonomous vehicles.
- 7.7 It is the vision that the development will facilitate the transition to net zero-carbon through the provision of mobility shift towards active travel and public transport through a 20-minute place.

8.0 Conclusions

- 8.1 St John's Woodland Village provides an excellent opportunity for the allocation of a new community that allows for the application of exemplar land use, health and mobility planning principles. The individual nature of the site allows these impacts to be managed through a phased access strategy that would be difficult to replicate elsewhere within the town and on this basis, the site represents a clear and compelling opportunity for allocation.
- 8.2 This Technical Note (TN) sets out the proposed Vision-led approach to Transport Planning, assessing the opportunity to optimise the use of the land to the east of Exmouth to accommodate approximately 750 dwellings.
- 8.3 St. Johns Woodland Village is a unique opportunity to link and enhance the facilities within the town, with a unique focus on an active travel first approach to movements within and beyond the new settlement. Principally, using the western boundary as an interface with the town, access by active and public/shared travel will be prioritised over the car, to the extent that car access will be pushed to the periphery of the development to protect key active travel links. The principal access will be formed onto the B3179, ensuring any routing to the local facilities by car will be circuitous and far less convenient than walking, cycling or shared mobility.
- 8.4 The site provides development of a scale that allows a range of complementary facilities within the site that will assist in both internalising trips within the site and localising trips within the wider area. The early phases of development can take benefit from the range of services within walking distance ensuring that infrastructure supporting active and shared modes can be provided in step with development. The phased access strategy, specific to the site's location and characteristics, seeks to restrict vehicular access along the western boundary of the site, adjacent to existing residential areas, resulting in a development that will manage traffic impact in a manner that limits both the requirement for unnecessary road infrastructure but also limits any undesirable impacts on the existing community.
- 8.5 SLR has applied a Vision-led approach to the assessment of the proposals and the specific characteristics of the site, seeking to maximise dwelling density and alongside them, the



range of facilities required to facilitate local living and placemaking at an exceptional level. The Vision-led approach increases the importance of active and public/shared travel systems in accommodating the forecast demand of the development conveniently, instead of placing road capacity and facilitating convenience by car above all else.

- 8.6 It has been demonstrated that trip rates obtained from a traditional TRICS assessment should not be used as an accurate representation for a site of this size and development mix. As such, this report sets out the Vision-led method which takes into account the sites specific characteristics, access strategy, proposed mobility interventions as well as existing and proposed land uses and community facilities to generate a realistic and representative trip rate.
- 8.7 Traditionally, the industry standard practice for determining the trip generation resulting from new developments is to use data from the TRICS database to determine the anticipated person and vehicular trip generation (or trip rates) of a proposed development based on recent traffic survey data for comparable sites across the country (Predict & Provide). This is a backward-looking approach, specifically it produces a level of traffic based on historic sites that bear little or no similarity to Vision-ed principles.

As demonstrated within **Section 6**, the traditional TRICS assessment generates a significantly higher trip rate than those obtained from the Vision-led model and in so doing seeks to accommodate levels of traffic that are unnecessary and as a result facilitates easy travel by car, encouraging use of the car over alternative modes.

- 8.8 In accordance with paragraph 108 and 109 of the NPPF, development of this scale brings forward wider funding opportunities that has the potential to deliver longer-term transport interventions which would have a significant influence on wider trip making behaviours and fundamentally change the trip patterns of this area of Exmouth.



Appendix A

Vision-Led Planning Tool – Methodology

To:

From: Tim Bright

SLR Consulting Limited

Date: 2 October 2024

Project No. 205513

RE: Land East of Exmouth

Validation Tool: Methodology

Detail has been set out below with respect to the background of the SLR Validation Tool, also known as the Vision-led Planning Tool. This is to inform ongoing discussions regarding the Land East of Exmouth proposed allocation.

Validation Tool: Methodology

A Vision-led approach is a modern transport planning method. It is applied by SLR Consulting and supports the net zero carbon policies of Local Planning Authorities and the UK Government. It can also promote the ESG objectives of developers and masterplanners.

It firstly imagines the vision - or desired conditions - of a new community, then identifies placemaking and mobility interventions to help realise those conditions.

The **Vision** for a new settlement might include the objectives (with quantified targets) of healthy, safe, quiet, clean, resilient, low carbon, vibrant communities, with good air quality and green spaces. Fundamental to this is to create well designed, pedestrian friendly, developments that support local living and **achieve lower levels of car use**. This can be realised through 20 minute neighbourhood principles, provision of local amenities and street design that affords space to people rather than vehicles.

The Vision is validated by calculating and quantifying the vision's impact on travel demand, mode share and carbon emissions resulting from such vision-led development designs, prioritising local living, active travel and shared mobility. This ensures that from the masterplanning stages, the community is designed in a way which will achieve its vision objectives and associated targets.

SLR have developed a tool to validate the Vision and assist in quantifying key impacts resulting from different site designs and tailored to specific site characteristics.

The Tool utilises existing data/evidence on trip making behaviour and amenity provision to calculate:

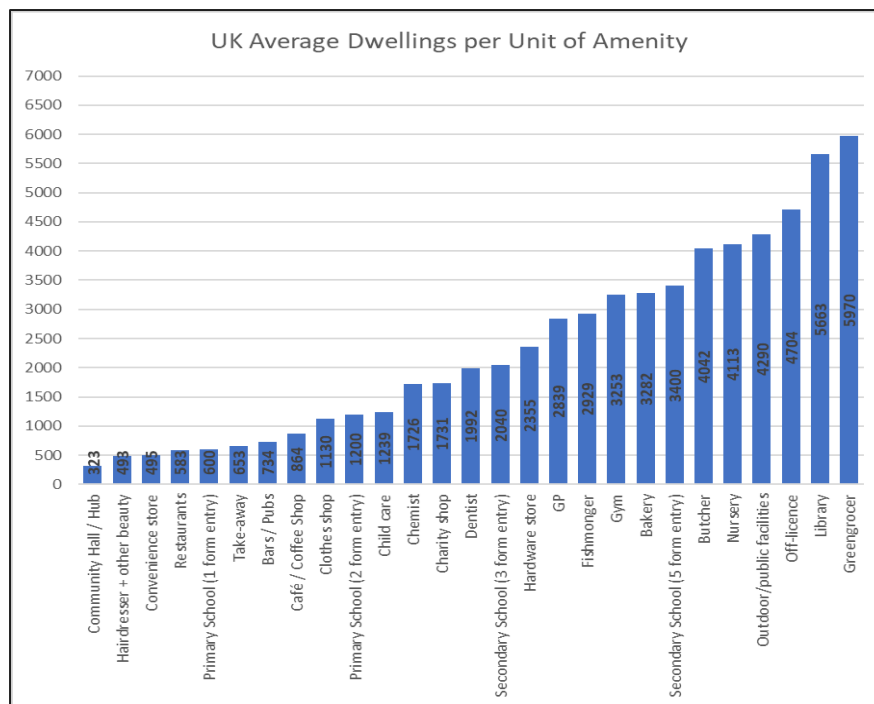
- What amenities are likely to be viable within new developments of different size and hence give guidance on what amenities could be localised.
- What the effect on trip making behaviour is likely to be if different amenities are included within the development: what trips can be localised / internalised, and what modes are likely to be used for these trips including the proportion of these trips that can be walked.
- What additional mobility interventions support low car use for remaining external trips. What are the trip making and mode share impacts of providing things like mobility hubs with frequent connecting bus, sustainable travel corridors, low car parking ratios etc.

Amenity Assessment

The first consideration of the Tool is what amenities can be localised, i.e., included within the new development.

- The Tool provides guidance on this through its amenity feasibility assessment: the basis for this is UK Business Count data on numbers of local units of different amenities for each LA District combined with the population per District to give an average population per unit of amenity in each District. In other words the population needed to sustain a single unit of each kind of amenity in each District of the country.
- This is then combined with site specific characteristics on the population, persons per household, area and shape of the new development to identify what amenities are likely to attract sufficient demand from the resident population for an amenity to be tenable (for commercial amenities) or necessary (for public service amenities).
- The need for Primary and Secondary schools is established on the traditional basis of applying pupil yield factors that reflect the policy of the relevant local authority.
- In addition to LA District specific data on dwellings per unit of amenity, UK average data is also provided to highlight where Local District data may be skewed by the presence of high numbers of tourists or high day-time demands from employment (resulting in lower numbers of residents per unit of amenity).
- The amenity feasibility assessment results in guidance on the amenities that should be considered for inclusion within the development – the Tool user has complete control over which amenities they actually include allowing local knowledge and professional judgement to be applied. This allows for completely flexible placemaking designs and scenario testing to be undertaken.



Figure 1 – UK Average for number of Dwellings per unit of Amenity

Trip Making – Base Data Tailored to Specific Site

Having selected the amenities to include in the development, the Tool then estimates the impact this will have in changing trip making behaviour of the development's residents.

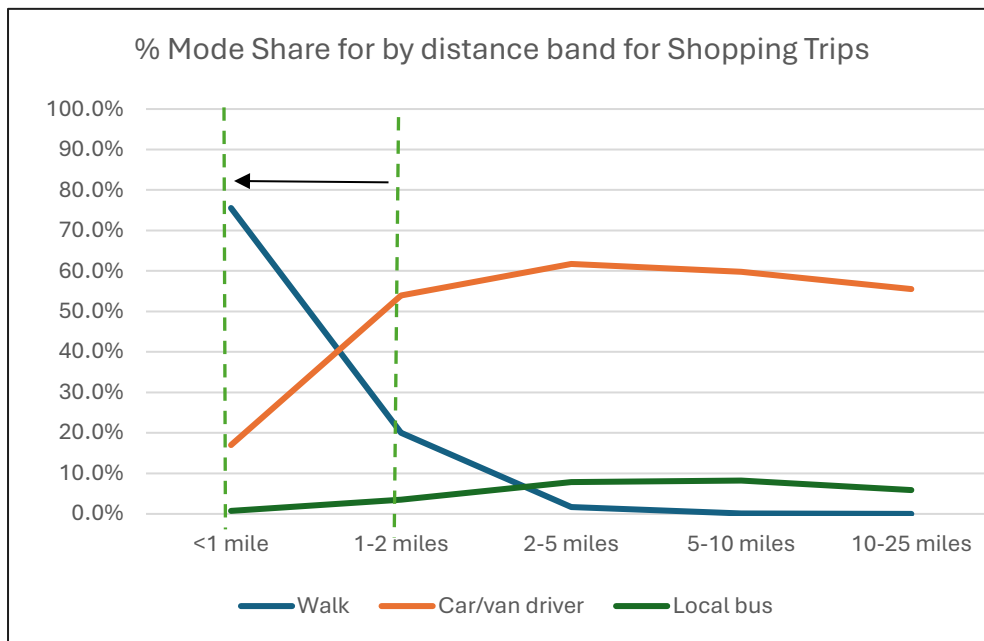
The logic underpinning these calculations is linked to changes in mode share associated with reduced trip distances.

The basis for the calculation is NTS data on average numbers of trips per person by area classification (urban conurbation, urban city and town, rural town and fringe, rural village and isolated) for 14 trip purposes. Within each trip purpose the mode share of trips is provided by the NTS data for 8 different distance bands.

This allows the Tool to establish the likely change in mode share resulting from shortening the distance to a particular amenity.

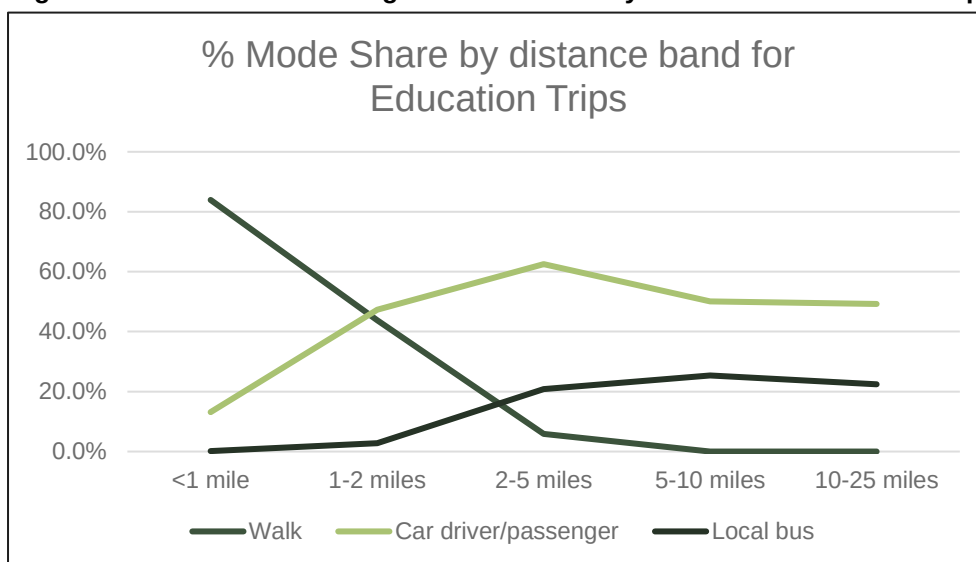
Including an amenity within a development brings the distance to reach the amenity to within 1 mile (in most cases within ½ mile) of the resident's home. At these distances, NTS data indicates that walking predominates for all trip purposes. Above these distances, car use begins to take an increasing importance (illustrated in Fig 2 for shopping trips and Fig 3 for education trips). These examples illustrate the potential for behaviour change through provision of on-site amenities.



Figure 2 – Illustration of change in mode share by distance for shopping trips

	Mode of Travel		
	Car Driver	Walk	Bus
Existing Store @ 1.5 miles	55%	20%	3.5%
New Store within Development	17%	77%	



Figure 3 – Illustration of change in mode share by distance for education trips

	Mode of Travel		
	Car Driver	Walk	Bus
Existing School @ 1.5 miles	>60%	<10%	20%
New School within Development	13%	>80%	

The proximity of existing amenities to the new development is a key consideration in the assessment of the potential changes in trip making behaviour and associated benefits. The Tool applies site specific data on distance to already existing amenities to tailor the NTS data applied in the assessment to reflect the specific site location and the existing amenity provision within its surroundings.

In addition to the proximity of existing amenities influencing mode share, the average number of trips per person for each trip purpose, available from the NTS data, varies according to household composition. If the development consists of mainly larger homes with 3+ bedrooms attracting families with 2 adults and at least 1 child, the number of trips per purpose differs from developments with mainly flats or 2 bed homes more suitable for single adults or adult couples, and both will differ somewhat from the NTS average for the area classification. To capture this variance, the Tool tailors the NTS data based on the household composition planned for the development to better reflect the purposes of trips made by the likely development residents.

A final adjustment can be made to the average NTS data in order to better reflect existing transport provision/connections to and around the new site. E.g., if the average NTS data for the area classification suggests a % train mode share but no train services exist near the local site, then this can be adjusted accordingly.

In summary, the underlying data feeding the Tool is detailed NTS data on average number of trips by mode within 8 different distance bands for 14 trip purposes. This data is specific to the classification of area in which the development is located. The NTS data is then tailored to reflect the specific site characteristics taking into account:

- the proximity to existing amenities and employment
- the current mobility provision surrounding the site
- type/mix of residents expected to reside in the site



The result is base data that reasonably represents the trip making demands of the people likely to live in the new development and reflects the local character of the site and its location.

Placemaking analysis

The Tool allows a wide range of amenities to be included in the validation assessment (see Figure 1). Although guided by the amenity feasibility assessment, complete flexibility is provided on which amenities to select. This enables the Tool to be useful in the very early stages of masterplan design to inform users on the impacts of different amenity mixes, or it can be applied later in the process to quantify the impacts of already established designs.

Having selected the mix of amenities to include in the development, the Tool then analyses the changes in trip making that this on-site amenity provision prompts by comparing the new distances and modes to these on-site amenities with those in the tailored base data. Applying these changes to the number of trips likely to be affected enables estimation of realistic levels of residential trips that can be internalised and contained within the development, the modes used for these internal trips, and the modes used and distances for remaining external trips.

The level of on-site employment and the extent to which this generates external versus internal trips is also considered in the assessment. This is based on in-depth analysis of Census data on place of work and usual residence or workers at the MSOA level (comparable in scale to a large new development). From this, a relationship between job density and internal workforce proportion is derived to give an indication of the level of commute trips that are likely to remain internal to the site for different dwelling to job ratios within the development.

Further to this, trips that can be avoided can also be included in the assessment, informed by trends in working from home rates, virtual business meetings, and home delivery of food and non-food shopping.

Combining the above elements, the Tool estimates the internal trips (including avoided trips) and those remaining external to the settlement and determines the initial modal share of trips resulting from the placemaking components of the development design.

Trips rates by trip purpose are output for both internal and external trips for a range of time periods including daily, 3-hour peak periods (7-10 & 16-19), and individual hours within these peak periods. Mode shares are also output for both internal and external trips for the same time periods.

Mobility Intervention Strategies

Following the placemaking analysis, the Tool provides intelligence on the extent to which different trip purposes continue to contribute car trips to the external road network.

A more focussed and targeted design of mobility interventions can then be considered in consultation with local stakeholders. Within the Tool, a range of mobility intervention strategies can be explored that further reduce car use, shifting to public transport, cycling and carpooling for remaining external trips or increased walking for internal trips. The impacts of these strategies are calculated for any defined level of ambition / expected shift.

Residential Trip Generation Outputs

Following this exercise, estimations of the residential trip generation (internal and external trips) by mode are obtained for the selected amenity provision and mobility measures. Outputs show the contribution of each element of the design to changes in mode share and car trip generation. Typical residential car-trip rates generated from the development are



output for the full day as well as for peak hours, providing the type of data expected for entry to Transport Assessments.

Figure 4 – Illustration of outputs relating to residential generated mode share

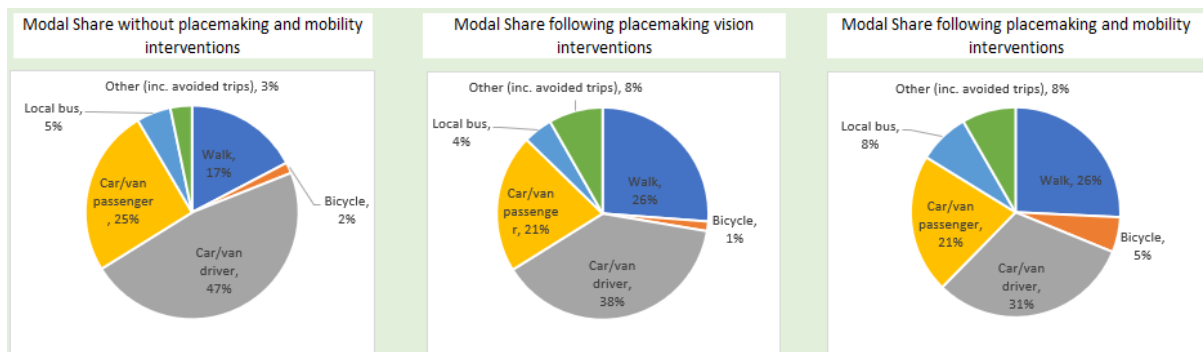


Figure 5 – Illustration of outputs relating residential generated external car trips

New Development following placemaking vision interventions				New Development following placemaking and mobility interventions			
Car Trips (external)	External Trips			Car Trips (external)	External Trips		
	Arrivals	Departures	Total		Arrivals	Departures	Total
Time of day				Time of day			
0700-0800	18	122	140	0700-0800	15	102	118
0800-0900	47	154	201	0800-0900	35	115	150
0900-1000	64	83	147	0900-1000	53	68	120
1600-1700	120	67	187	1600-1700	99	55	154
1700-1800	148	64	212	1700-1800	125	54	178
1800-1900	113	53	166	1800-1900	93	44	137

Carbon Emissions Analysis

In addition to trip generation by mode, carbon emissions calculations can be provided for five differing scenarios:

- 1 do-nothing (i.e. no new development),
- 2 new development based on no on-site amenity provision,
- 3 vision based new development incorporating only placemaking elements,
- 4 vision based new development incorporating placemaking and mobility components,
- 5 vision based new development incorporating placemaking, mobility components and variable EV uptake.

Future year emission factors by mode up to 2050 are derived from government recommended future emissions factors for each mode of transport (derived from TAG data forecasts of proportions of vehicles that will be electric combined with IEA data on the rate of decarbonisation of the electricity grid). This reflects what is likely to happen anyway in the background, with or without the development, and results in lower carbon emissions over time. This is termed the 'Tailwinds' carbon reduction.

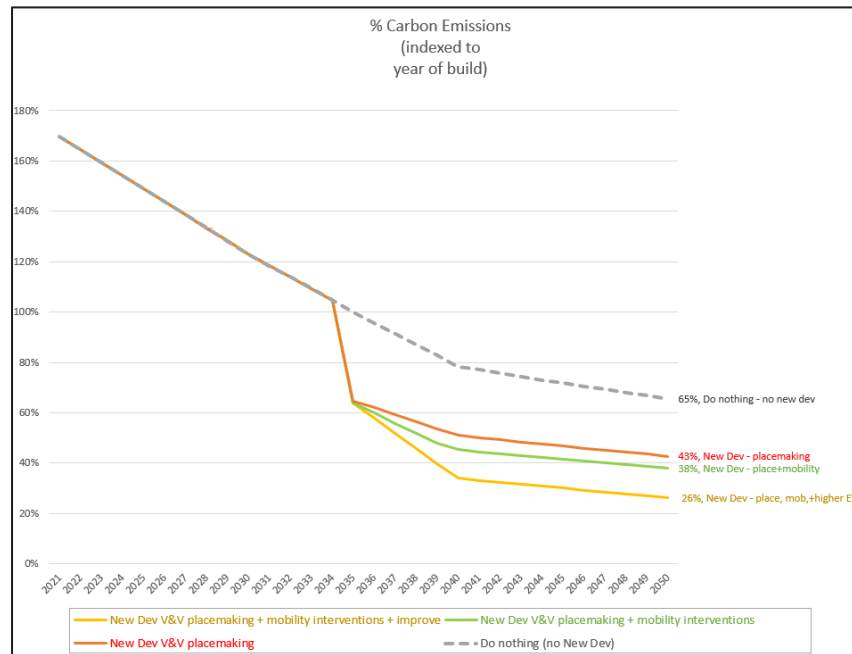
The do-nothing scenario applies the Tailwinds reductions to current trip making of people likely to move to the new settlement. This assumes 75% of people that would move to the new settlement come from within the LA District in which the settlement is located and 25%



from the Wider Region and trip making distances and modes are derived from average NTS data for these areas.

The carbon emissions for each of the other scenarios are determined by applying the government recommended future emissions factors for each mode of transport to the total distances travelled using each mode of travel (as determined by the Tool). The carbon emissions for the other 4 scenarios are presented relative to the Do-Nothing scenario indexed to the year of build completion.

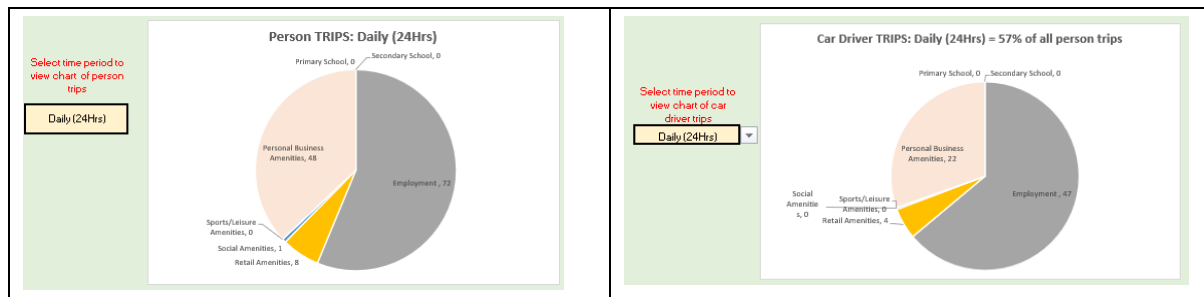
Figure 6 – Illustration of Carbon Reduction Outputs for 4 Scenarios (not site specific)



Trips Attracted into the New Development Site

Where amenities and/or employment have been included in the settlement design, it is necessary to also check the levels of trips from outside the settlement that might be attracted to use these new amenities / new jobs contained within the settlement. The approach for this is to determine the extent of school places and jobs not filled by on-site residents to estimate the externally generated trips (those from outside the settlement) that are attracted to schools / jobs within the site. For all other amenities (retail, leisure, social, personal business) where use is not capped or limited by a fixed number of places, then a different approach is needed. This involves estimating the approximate population from outside the development site for which the on-site amenity is likely to become their easiest to access / preferred choice. A methodology for determining this is provided within the Tool. The extent to which these external trips attracted to the new amenities/jobs are a net-benefit or a net-disbenefit depends on the nature of the new trips (distance, mode, congestion levels) relative to the trips they replace. Typically these trips will be to a closer amenity than before, which could be considered as VMT saved overall. This would be welcome especially where such trips avoid the highway network in particular (a common challenge).

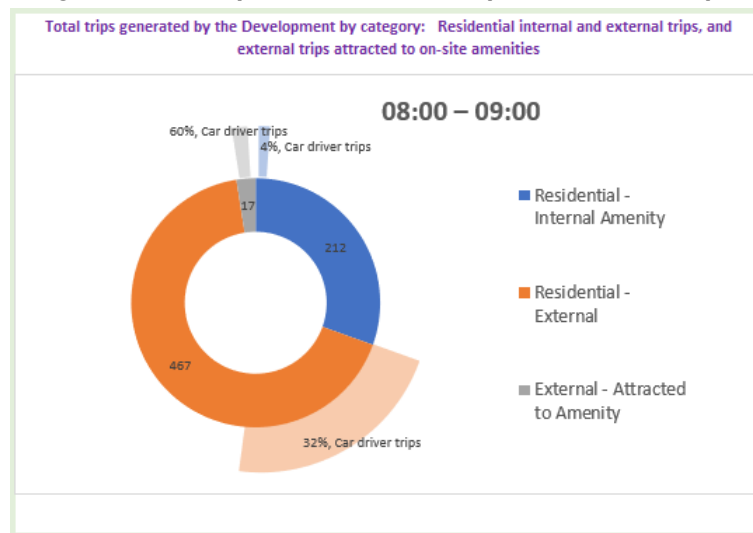


Figure 7 – Illustration of outputs relating to Person Trips Attracted to the Site

Summary

Outputs related to the overall trip generation, combining residential internal trips, residential external trips and trips attracted to the site can be output by the Tool for use in a wide range of design proposals, stakeholder consultation documents and impact assessment reports.

The tool can also be used in an interactive fashion with stakeholders, exploring impacts of 'what-if' scenarios in real time.

Figure 8 – Example of Combined Trip Generation Output

The above described method provides a 'backcasting' framework to settlement design enabling the masterplanner to quantify and understand (Validate) the full impacts of placemaking and mobility components and allowing them to select and design these in a manner that aligns with the Vision.





Making Sustainability Happen

St. John's Woodland
Technical Note:
Historic Environment
Prepared for
Eagle Investments (SW) Ltd
and 3West Group
September 2024



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Contents

1.0	Introduction	1
1.1	Purpose	1
1.2	Site and scope	1
1.3	Methodology, sources and limitations	2
1.3.1	Methodology	2
1.3.2	Sources	2
1.3.3	Historic Environment Record	2
1.3.4	Limitations	2
1.4	Designations	2
2.0	The site and its heritage significance	3
2.1	Historic development	3
2.2	The site today	4
2.2.1	The church	4
2.2.2	The historic environment.....	4
2.3	Historic significance	6
2.3.1	Methodology	6
2.3.2	The significance of the designated assets.....	7
3.0	Assessing heritage impact and potential for mitigation	9
3.1	Heritage impact (current)	9
3.1.1	Current proposals	9
3.1.2	Current mitigation	9
3.1.3	Current impact	9
3.2	Heritage impact (future)	10
3.2.1	Future proposals	10
3.2.2	Future mitigation	10
3.2.3	Future impact	10

1.0 Introduction

1.1 Purpose

Alan Baxter Ltd was commissioned by 3West Group (on behalf of Eagle Investments (SW) Ltd) in September 2024 to prepare a Technical Note regarding the heritage impact of a proposed residential development to the northeast of Exmouth, Devon, with a masterplan prepared by LDA Design.

East Devon District Council is preparing a Local Plan covering the period 2020 to 2040 that will allocate sites for development and is undertaking a Site Selection process. The proposed development is referred to in this exercise as **EXMO_20a and EXMO-20b - Land at St. John's, Exmouth**, hereafter as 'the proposed development'.

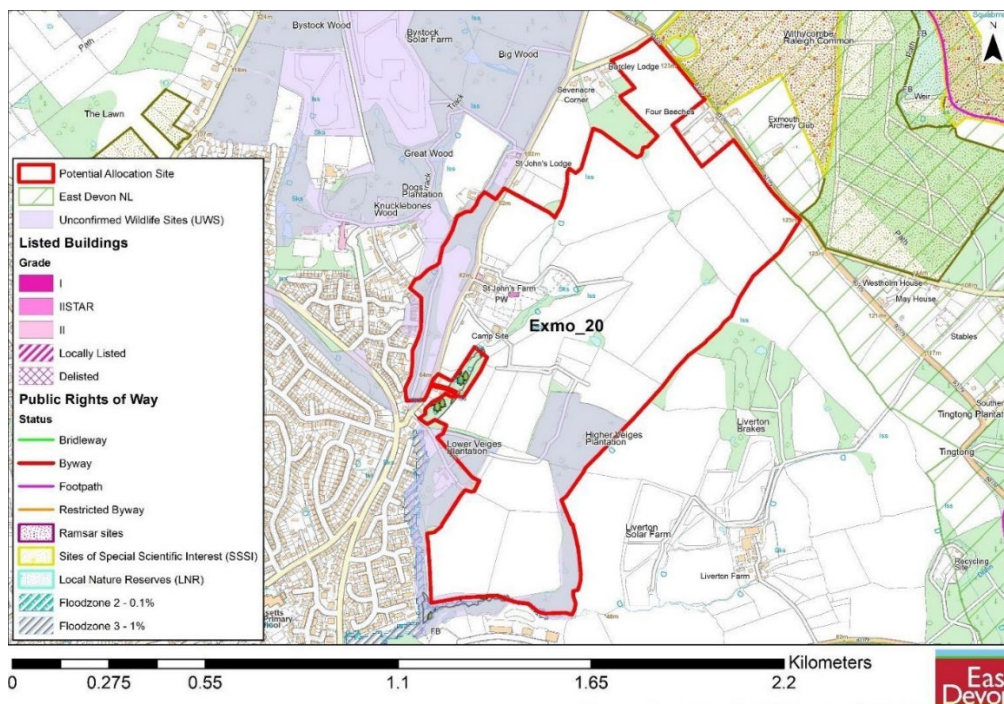
In its August 2024 Site Selection Report, East Devon Council stated that:

There are a small number of heritage assets in and around the site. Of most importance is the Grade II Star St John in the Wilderness church. Any possible site development would need to fully take into account the setting, specifically including sense of remoteness, of the church and the sensitivities associated with other assets. However, it is recognised that given the large site size there is scope to consider overall layouts and to potentially leave appropriate buffers undeveloped.

This Note therefore sets out a summary of the site's history, heritage significance, mitigation measures that may be undertaken to limit the impact of the proposed development and an assessment of impact. It also advises on next steps.

1.2 Site and scope

The site of the proposed development is shown below (figure 1). This totals 85.46 ha. For details of the proposed development, the reader is directed to the main masterplan and 'vision' reports prepared by LDA Design (September 2024). Below ground archaeology is excluded.



1.3 Methodology, sources and limitations

1.3.1 Methodology

A site visit was undertaken on 12 September 2024. Where relevant, the advice given in this Technical Note has been informed by guidance set out in Historic England's *Advice Note 12: Statements of Heritage Significance: Analysing Significance in the Historic Environment* (2019); Historic England's *Advice Note 12* and *Advice Note 16: Listed Building Consent* (2021) and *Good Practice Advice in Planning: The Setting of Heritage Assets* (GPA3, 2017) has also been followed.

1.3.2 Sources

- Cherry, B. and Pevsner, N., 1989. *Devon*. New Haven: Yale University Press. (Pevsner Architectural Guides: Buildings of England).
- Church of England, 2024. *Church Heritage Record*.
- East Devon Council, 2020. *List of Local Heritage Assets*.
- Fiona Fyfe Associates; Countryside and Robin Lines Landscape, 2019. *East Devon and Blackdown Hills Landscape Character Assessment*.
- Historic England, 2024. National Heritage List for England (NHLE)
- National Library of Scotland, 2024. *Ordnance Survey maps*.
- University of Portsmouth, 2024. *Ordnance Survey and Ordnance Survey of Scotland First Series* (A Vision of Britain Through Time).

1.3.3 Historic Environment Record

The Devon Historic Environment Record has been consulted. Records within the site include *Orchard Banks to the east of Withycombe Barton*; *Possible Catch Meadow to the south of Withycombe Barton*; and *Pit to the North of Higher Veiges Plantation, Exmouth*. An assessment of the impact of the proposed development on archaeology will be required at the next design stage and prior to any planning application.

1.3.4 Limitations

It is the nature of existing buildings that details of their construction and development may be hidden or may not be apparent from a visual inspection. The conclusions and any advice contained in our reports — particularly relating to the dating and nature of the fabric — are based on our research, and on observations and interpretations of what was visible at the time of our site visits. Further research, investigations or opening up works may reveal new information which may require such conclusions and advice to be revised.

1.4 Designations

This report considers three designated heritage assets:

- **Higher Lodge**, a cottage fronting St John's Road, listed Grade II (NHLE: 1164796)
- **Withycombe Barton**, a large, red brick house fronting St John's Road, listed Grade II (NHLE: 1333477)
- **Church of St John in the Wilderness**, listed Grade II* (NHLE: 1333479)

The site is not in a conservation area and is partially in a National Landscape area (formerly 'Area of Outstanding Natural Beauty').

The East Devon List of Local Heritage Assets has also been consulted and no non-designated heritage assets have been identified within or surrounding the site.

2.0

The site and its heritage significance

This section summarises the historic development of the site and the three designated heritage assets. It then describes the site as it exists today.

2.1 Historic development

Exmouth, located at the mouth of the River Exe, developed and grew as a result of its maritime importance as a fishing village and eventual redevelopment as a fashionable seaside resort.

Withycombe Raleigh is a civil parish to the northeast of Exmouth. Following twentieth-century suburban growth, its southwest part now forms the suburban edge of the town. The name "Withycombe" is derived from Old English, meaning "withy valley" or "valley of willows," and "Raleigh" likely refers to the ancient Raleigh family, who were local landowners in the medieval period. It is shown in an 1809 map and in historic maps thereafter (see figures 7-10).

The agricultural history of East Devon is rooted in its geography and climate, with fertile soils, mild coastal climate, and varied landscapes highly suitable for arable and livestock farming. The development of farming in the region reflects the broader trends in English agriculture, from medieval subsistence farming to modern, mechanised agriculture.

Field boundary enclosure during the seventeenth century resulted in the open fields and common lands gradually penned by hedgerows and fences, leading to a more organised and efficient farming system. It is likely a second phase of enclosure was undertaken during the nineteenth century. Throughout this period, the area consisted of farmsteads and isolated buildings. The nearest village was Withycombe Raleigh, to the south.

The church of St John in the Wilderness was built in the Middle Ages as a chapel of ease, most likely for workers on nearby farms and large houses (chapels of ease were built within the bounds of a parish for the attendance of those who could not easily worship at the parish church, typically because of distance). Small sections of building fabric date to the late fourteenth century, but the tower and northern aisle date from the fifteenth century.

Except for this tower and aisle, the church was demolished in 1788 having been neglected following the construction of a new church in the village in 1720. A nave and chancel were rebuilt in 1925-32 on original foundations.

Today, St John in the Wilderness Church is in the Church of England (Anglican) Parish of Withycombe Raleigh, which was established in 1850.

2.2 The site today

2.2.1 The church

Today, St John in the Wilderness is one of three churches in the Parish of Withycombe Raleigh: the others being the Parish Church of St John the Evangelist on Withycombe Village Road and All Saints' Church on Exeter Road.

The church's website states that:

St John in the Wilderness has a lively, active and mission-oriented church community... This community reflects the local population in comprising people of a wide range of age and backgrounds, worshipping in a variety of styles... Through liturgy and worship, faith exploration, social events, community concern, and outreach, our aim is to grow together in likeness to Jesus Christ.

2.2.2 The historic environment

- The church is an attractive Gothic building, partially built in local sandstone, with a west tower. The simple interior has barrel roofs.
- Its immediate setting is the large churchyard (see figure 2). Historic map analysis (see figures 7-10) shows that this has been gradually enlarged to the north and northeast during the second half of the twentieth century, replacing an orchard. The churchyard rises from east to west and has a large collection of gravestones and mature trees, with several large yew trees on the southern edge of the church limiting views south. It is bound on all sides by perimeter trees and shrubs, with the exception of a low brick wall and entrance gate running partially along its western edge.
- Outside the churchyard, the wider setting consists of woodland to the southeast and open pasture fields to the north, east and south. To the west, a small collection of houses are situated between the entrance to the churchyard and St John's Road (see figure 3). Beyond this is an open field and beyond that lies twentieth-century, suburban housing. To the south are a collection of mid-late twentieth century agricultural farm buildings, the construction of which has resulted in the loss of a historic belt of woodland. The topography of the wider setting is a rolling landscape, with the ground level falling away just beyond the woodland to the southeast, before rising again at the point of the next line of hedgerows. To the north, the land initially rises gently, before levelling off. Altogether, the character of the church's wider setting is reflective of its historic setting as a rural chapel of ease and contributes to its qualities as a place of quiet reflection and worship.



Figure 2: Church of St John in the Wilderness, looking southwest. Source: Alan Baxter Ltd



Figure 3: Housing along lane running west-east between St John's Road and the church

2.3 Historic significance

2.3.1 Methodology

Assessing significance is the means by which the cultural importance of a place and its component parts are identified and compared, both absolutely and relatively. The National Planning Policy Framework (NPPF, 2023) places the concept of significance at the heart of the planning process. Annex 2 of the NPPF defines Significance (for heritage policy) as:

The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

'Setting' is defined in the NPPF (2023, Annex 2: Glossary) as:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

This means that all heritage assets have a setting, separate from the concept of curtilage, character and context. However, the contribution made by the setting to the significance of heritage assets varies considerably and is subject to change over time. Defining the extent, nature and contribution of a heritage asset's setting can be challenging. Historic England offers guidance on this in its *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets* (December 2017). This advises that one common way of understanding setting's contribution to the significance of a heritage asset is through views. However, the setting of a heritage asset encompasses more than just this purely visual impression. It is also influenced by other environmental factors and the historic relationships between places.

2.3.2 The significance of the designated assets

Higher Lodge

This cottage fronting St John's Road to the north is of architectural interest as a cottage orné: a small dwelling dating from the nineteenth-century designed in a rural or traditional vernacular style. It is also of regional historic interest for its former association with a large house to the south known as 'St John's Cottage' (shown in figure 8, since demolished). It was built to face (and partially control access from) a road, which remains today as a country lane. The building is of high significance and its setting makes a positive contribution to its significance.

Withycombe Barton

This large, red brick house fronting St John's Road, is a building of regional historic interest as an example of a late nineteenth-century building associated with the farm/stable buildings to its rear (west) and its association with the large house and extensive grounds at Bystock Court (the house survives today and is Grade II listed). The former stable/farm buildings to the west (now housing) associate with the building in an ancillary manner and form a group that has existed since the listed house was constructed. The historic setting of the house has been altered as a result of the loss of a visual and access connection with the house and grounds of Bystock Court, and as a result of twentieth-century housing constructed in its immediate setting (figure 3). The house is of high significance, whilst its setting makes a small degree of positive contribution to its significance.



Figure 4: Withycombe Barton, a Grade II listed, large, red brick house fronting St John's Road

Church of St John in the Wilderness

This is a nationally, architecturally significant building because it contains substantial amounts of medieval fabric, including its tower, and was the subject of a sympathetic neo-gothic reconstruction in the 1920s. As a place of Christian worship for over six centuries, it is also of local historical interest. Its immediate setting (the churchyard) makes a strong, positive contribution to its significance because it upholds its historical functional and landscape setting. To a degree, its wider setting (the rural landscape beyond) also contributes positively to significance in that as a chapel of ease, the church has always had an isolated, rural setting and that many historic field boundaries survive. However, its historic setting has been altered following the construction of a collection of houses to the west and agricultural buildings to the south. Furthermore, because of mature planting around the churchyard and surrounding field boundaries to the north and east (much of it remaining in locations shown on nineteenth-century maps), its setting is experienced visually in only limited areas and there are only glimpsed views from the churchyard to surrounding fields. The church is of high significance, whilst its setting makes a degree of positive contribution to significance.



Figure 5: This photo taken from the point of access into the northwest extension, looking back (west) at the church and churchyard.

3.0

Assessing heritage impact and potential for mitigation

At this stage, it is possible to provide a summary of the likely heritage impact of the proposed development. This is informed by our assessment, which has included an understanding of the church's development and historic setting; the analysis of historic maps; a site visit; and an understanding of the site's topography.

This section does not, however, constitute a formal impact assessment. Such an assessment, in line with national, regional and local policy and following best industry practice and guidance, will be undertaken at a subsequent design stage as part of a LHVIA (Landscape, Heritage and Visual Impact Assessment) and in advance of any pre-application discussions with East Devon Council and other stakeholders.

3.1 Heritage impact (current)

3.1.1 Current proposals

The proposed development constitutes over 700 houses arranged around the two designated heritage assets, with most development concentrated to the north, east and south.

3.1.2 Current mitigation

Through an analysis of the site and its character, and by following best design practice, the existing design has already undertaken measures to mitigate the impact of the proposed development on the listed building's setting and significance. This includes a buffer of open land placed around church, which includes the retention of large, open space that is rural in character to the southeast.

3.1.3 Current impact

Where the Grade II listed cottage orné fronts St John's Road, the nature of the site boundary results in a generous distance between the proposed development boundary and St John's Road, to the west. Any glimpsed views are also limited through mature planting along the lane. The proposed development would likely have a neutral impact on the setting of the house and thus a neutral impact on its significance.

Where the large, red-brick Grade II listed house fronts St John's Road, a plot of new housing is to be placed to the west of an existing belt of high hedgerows and mature trees. This provides a visual buffer between the house and also seeks to retain the rural character of the road. The setting of the house has already been changed by the construction of new houses during the twentieth century. As a result of the proposed layout and the extent of screening provided by mature trees, any harm to the contribution that its setting makes to the significance of the building would be minimised.

Regarding the Grade II* listed church, the proposed scheme would likely have no impact on its immediate setting. It would negatively affect the wider setting of the church, because although an open field to the southeast has been retained as a common, there is a loss of other areas of open, agricultural land further to the north, east and south. The development would therefore likely result in a degree of harm to the significance of the church. As it only affects the contribution made to significance by an element of wider setting, this is assessed as at the lower end of 'less than substantial harm' (i.e. the degree of heritage harm is considered minor).

If the proposals are taken forwarded without amendment, then any heritage harm identified would need to be balanced against public benefit and any heritage benefits.

3.2 Heritage impact (future)

3.2.1 Future proposals

As the masterplan evolves and further design work is undertaken – and in consultation with East Devon Council and other stakeholders – changes may be made to the proposals to respond to the setting of the designated assets and further conserve and enhance the historic environment, in line with policy.

3.2.2 Future mitigation

Based on our assessment, to further mitigate any residual impact on the significance of the designated heritage assets, the following measures could be considered to minimise intervisibility between the church and the proposed development.

- At location 1 (see figure 6), the existing hedgerows are comparatively thin and the ridgeline is higher than the tower of the church. The 1889 OS map (figure 8) shows trees running along these field boundaries. To reduce intervisibility between the church and the proposed development additional hedge trees could be planted, helping to screen the proposed school/community buildings and buildings south of it.
- At location 2 (figure 6), a section of historic woodland was felled in the mid-late twentieth century to allow for the construction of modern farm sheds and a farm track to cross the stream west-east and access fields. This woodland is identified in a darker shade in the 1809 first series OS map (figure 7) and shown on the later 1889 and 1933 (figure 10) OS maps. The removal of these modern farm sheds south of the site and reinstatement of woodland either side of the stream would restore the historic belt of woodland and provide further enclosure south of the church.
- At location 3 (figure 6), a single mature tree stands along a hedgerow. The 1889 OS map (figure 8) shows many more trees along this field boundary. Reinstating trees along this hedge line would help to screen proposed development north of the church from the glimpsed views out of the churchyard.
- At location 4 (figure 6), additional planting to strengthen the existing woodland running to the southeast would improve screening of the proposed development and restore historic woodland.
- Finally, the detailed design of approach roads and street lighting could minimise the impact of light pollution and traffic noise on the immediate setting of the church and the house fronting St John's Road, such as at location 5 (figure 6).

3.2.3 Future impact

If such mitigation measures are undertaken, any identified harm to the significance of the historic environment is likely to be lowered still further. It is possible that the extent of these mitigation measures could result in no harm being identified, and as a result the proposals would be wholly compliant with policy for the historic environment. If any residual harm is identified, this would need to be balanced against the public benefits and any identified heritage benefits of the scheme.

The impact of the scheme with additional mitigation measures undertaken will be tested as part of a formal impact assessment at the next design stage.



Figure 6: Aerial photograph (2024) orientated east with locations for potential mitigation numbered. Boundary of churchyard marked with dashed red line. Church building marked with solid red line.



Figure 7: 1809 Ordnance Survey First Series, Sheet 22. Location of church circled in red. Source: Vision of Britain, Licence: CC BY-SA 4.0.

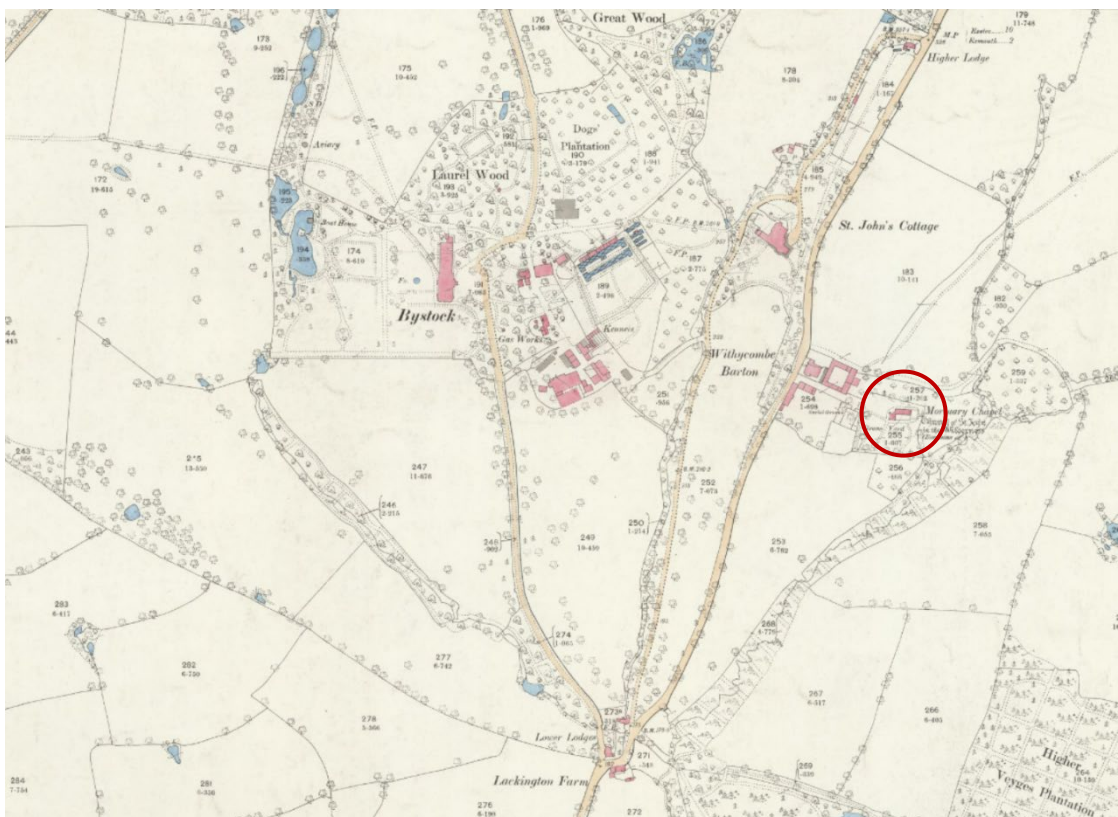


Figure 8: 1889 Ordnance Survey Map. Location of church circled in red. Source: Reproduced with the permission of the National Library of Scotland.



Figure 9: 1903 Ordnance Survey Map. Location of church circled in red. Source: Reproduced with the permission of the National Library of Scotland.

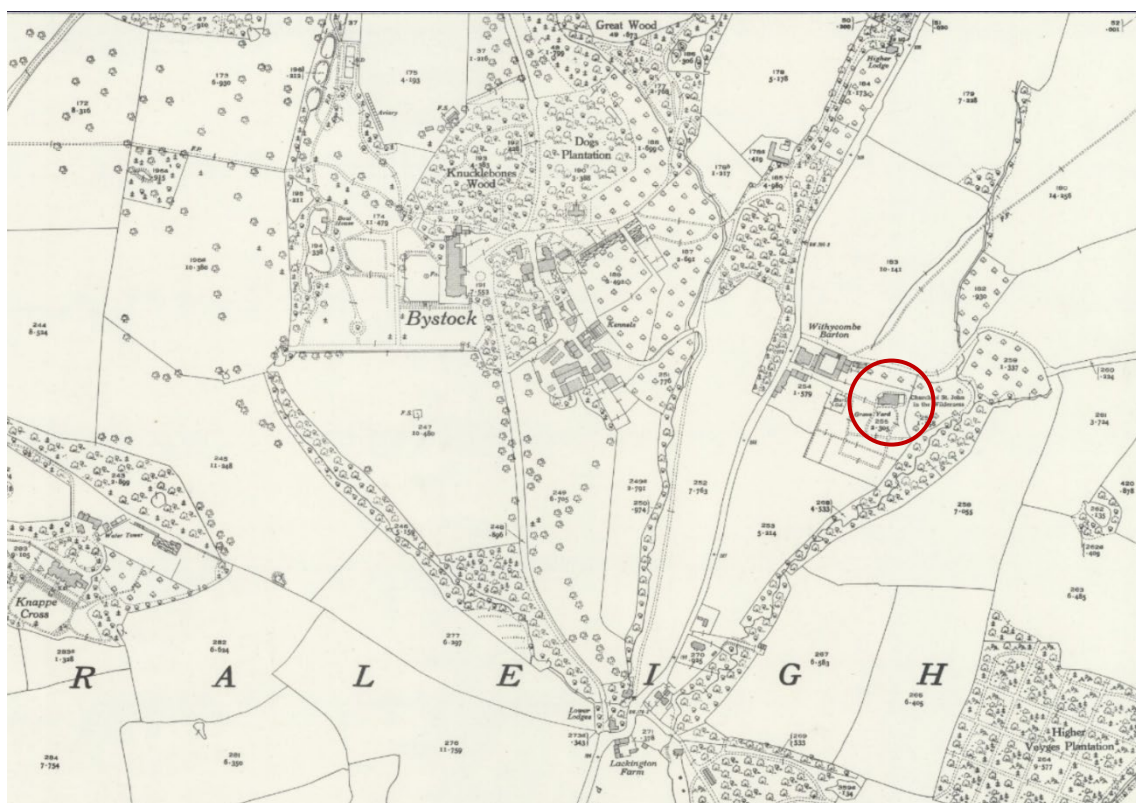


Figure 10: 1933 Ordnance Survey Map. Location of church circled in red. Source: Reproduced with the permission of the National Library of Scotland

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Prepared by Joe Pundek
Reviewed by Richard Pollard
Draft issued 16 September 2024
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