

East Devon Local Plan 2020-2042

**Site Selection report Addendum –
Historic Environment Site Assessment
Exmouth**



November 2025

Contact details

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

Phone: 01404 515616

Email: planningpolicy@eastdevon.gov.uk

www.eastdevon.gov.uk/planning/planning-policy/
[@eastdevon](https://www.instagram.com/eastdevon)

To request this information in an alternative format or language please phone 01404 515616 or email csc@eastdevon.gov.uk

Contents

1	Introduction.....	4
2	Site Reference Exmo_08.....	5
3	Site Reference Exmo_16	13
4	Site Reference Exmo_17.....	18
5	Site Reference Exmo_20.....	26
6	Site Reference Exmo_47	44

1 Introduction

- 1.1 East Devon District Council is preparing a Local Plan covering the period 2020 to 2042 that will allocate sites for development. The site selection process is a judgement that balances top-down strategic issues relating to the Local Plan district-wide housing and employment requirements and the spatial strategy for the distribution of development, with the specific factors in the site assessments. For each settlement, a Site Selection report¹ contains the assessment of sites and identifies those which will be allocated, alongside those that will not, with reasons why.
- 1.2 The Regulation 19 Publication Draft Local Plan consultation took place from February to March 2025. Historic England and Devon County Council identified major concerns for some sites, relating to the impact upon the historic environment. This report is an addendum to the Historic Environment Site Assessment prepared for the sites at Exmouth where Historic England and Devon County Council comments required further assessment.

¹ Site Selection reports are available at: [Evidence and Examination Library - Site Allocations \(SAL\) - East Devon](#)

2 Site Reference Exmo_08

Site details

Settlement: Exmouth

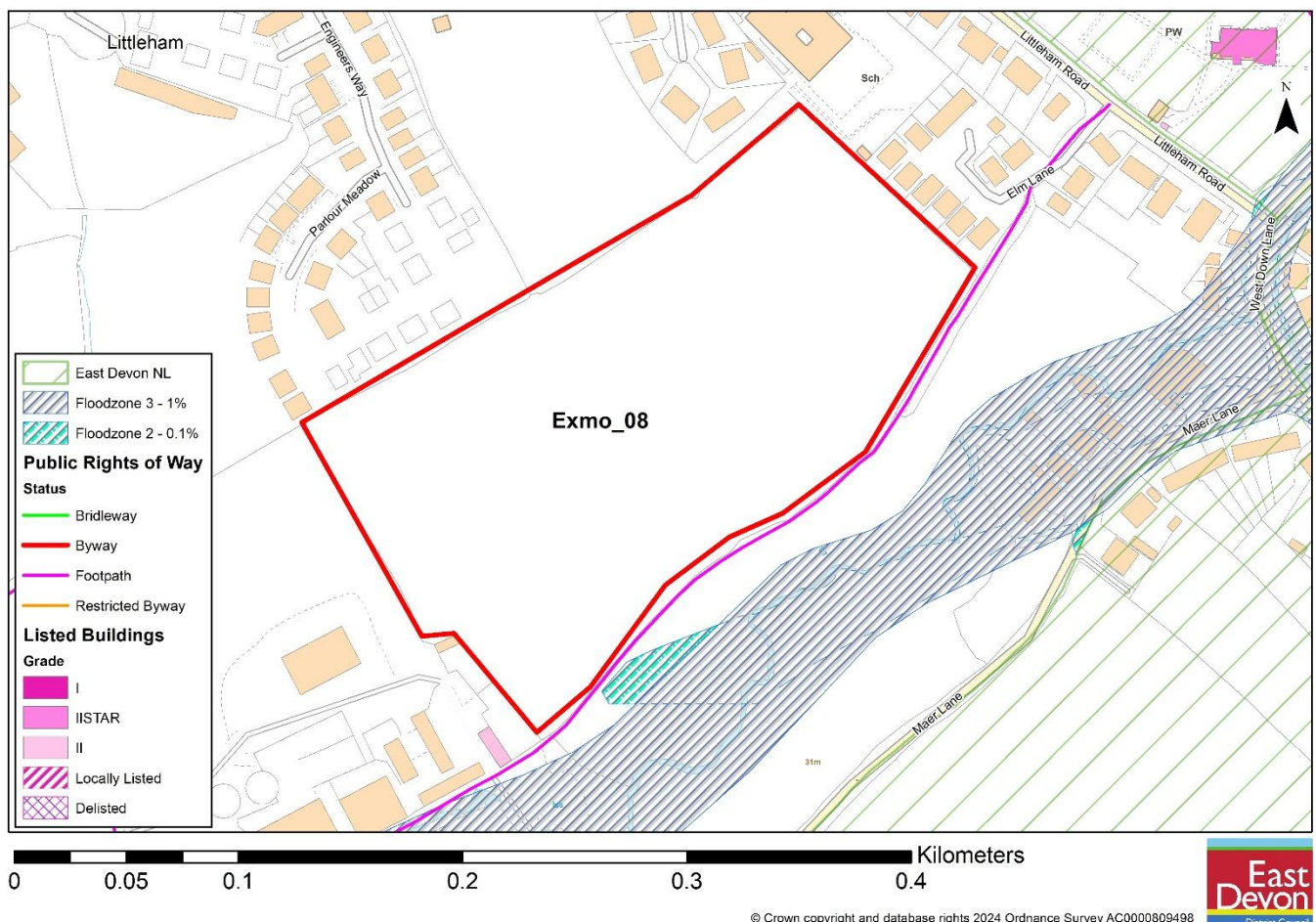
Reference number: Exmo_08

Site area (ha): 3.99

Address: Littleham Fields, Exmouth,

Proposed use: Housing development

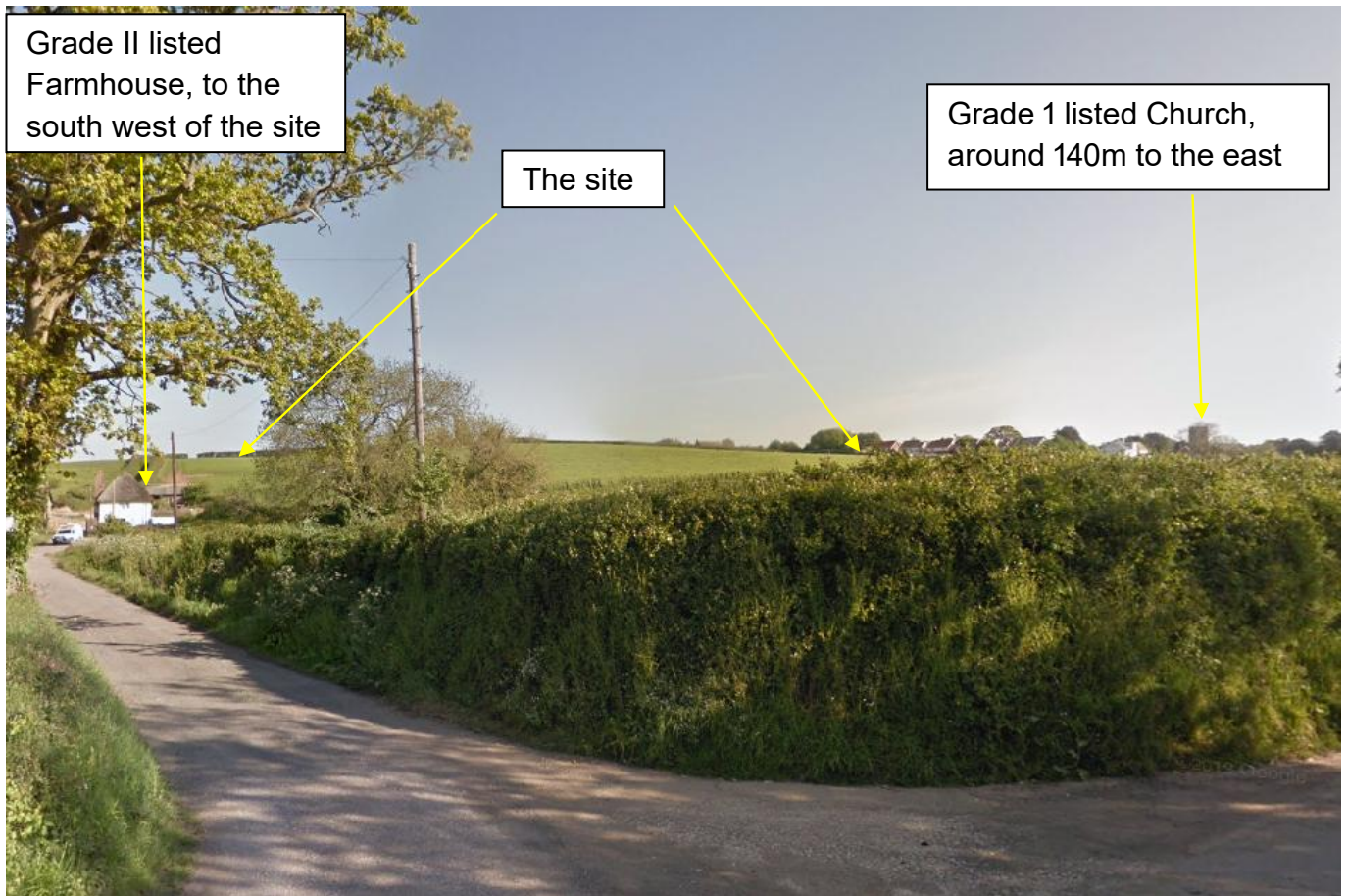
Site map



Photos



Photograph of the site, looking in a northerly direction from the footpath near to the most southerly tip of site. The site comprises of the field beyond the hedgerow in the foreground and below the houses on the ridgeline.



(Streetview) Photographs of the site taken from Maer Lane to the south, looking north, but it should be noted that new housing development (built after the photo was taken) sits above the ridgeline in the centre of the photograph. If developed the site would be seen in the context of this new housing.



Historic Environment Site Assessment

Notes on history of area

Mapping from the 19 century indicates that the site existed as four separate land parcels, one shown as a wooded area. Littleham village falls to the east of the site. The site itself forms part of a much larger area that is identified on the Devon County Council Environment viewer as Littleham Manor, Exmouth. Text for the larger area advises "The bounds of the Saxon manor of Littleham equate fairly well with the later ecclesiastical parish."

There are no designated landscapes within or abutting the site. However, the East Devon AONB lies to the south of the site at its closest point around 100 metres away.

Overall conclusion

There are clear heritage sensitivities associated with the potential development of this site. However, new housing development on the ridgeline above and overlooking the listed farmhouse already compromise aspects of heritage setting. The farmhouse is no longer read, from views and setting to the north (and east) as being in an undeveloped countryside location. Furthermore historic setting value is compromised by modern, mid/late 20th century, agricultural buildings to its east. Development of the site would need to be carefully undertaken but with plan policy requiring a carefully designed sensitive scheme allocation is seen as appropriate.

Step 1. Identify any heritage assets potentially affected	
Is the site within 100 metres of a designated heritage asset?	Yes Green Farm is Grade 2 listed and just to the west of the site. Further away is the Grade 1 listed St Margaret and St Andrew's Church.
Could development of the site affect any heritage asset (designated or non-designated) or its setting?	Yes
List any heritage assets potentially affected.	1. Green Farm

Step 2. Existing contribution of site to significance of heritage asset	
Heritage asset 1	
Description of asset	<p>Green Farm</p> <p>The site lies to the east of Green Farm which is recorded as a 17th or 18th century long thatched house. The listing description advises: Littleham Green Farmhouse SY 08 SW 6/76 II GV 2. Probably C17 and C18. A long thatched house. Roughcast facade. 2 storeys. 5 windows, sashes and casements. Rear elevation has 3 large external chimneys, 2 with ashlar masonry at base. Semi-circular projecting baking oven. Short length of rendered garden wall adjoining house, thatched coping stone wall with cobble stone coping beyond. An inspection survey in 2004 recorded the overall condition as Good.</p>
Significance of asset and setting	<p>High</p> <p>The Farmhouse in Grade II listed and there is a clear visible connectivity between the site and the asset. The site forms part of the rural, agricultural setting of the farmhouse.</p>

<p>Relationship of site with heritage asset</p>	<p>Littleham Green Farmhouse, a 17th/18th century long thatched house, lies right on the southwest corner of the site. The most important heritage asset that is close to the site is the Grade I listed St Margaret and St Andrew's Church which lies 140 metres away to the northeast.</p> <p>There is clear visible connectivity between the site and the Farmhouse. The site itself is mostly higher than the farmhouse and westerly parts look over the farmhouse and its small garden area. It is likely that the site would have historically functioned as part of the agricultural farmstead so there is a functional relationship as well as a proximity relationship between the two.</p> <p>There is a less significant impact on the Grade 1 listed Church, due to distance and intervening houses and foliage.</p> <p>With regard to both assets, the undulating topography of the land beyond the built form, which includes Elms Close a more recent small residential development site located to the rear of Littleham Road and west of the allocated development site, will elevate any form of development, with limited scope to mitigate on account of the topography of the landscape which presents itself in longer views across the site from higher land.</p> <p>The site abuts an urban edge of Exmouth and as such is influenced by the suburban built form of adjoining parts of the town, although they are peripheral to the site, though visible, when viewed from Maer Lane (which runs the length of the site). The coast is not visible from the site but there are countryside views down Littleham valley and into the East Devon AONB to the south.</p>
<p>Level of contribution (site to heritage asset)</p>	<p>Significant</p>
<p>Further assessment required?</p>	<p>Yes</p>

Step 3. Identifying potential impact on significance of heritage asset	
Heritage asset 1	
What impact would development have on the heritage asset and its setting?	<p>Moderate</p> <p>The site lies in very close to the asset and proximity of development could result in adverse impacts on setting through urbanising affects, all be the setting of the farmhouse is already compromised to a degree by more modern farm buildings to its west.</p>
Could the site be developed in a way that minimised potential impact?	<p>The south western part of the site could be left undeveloped or form an open space area or amenity land and this would lessen overall urbanisation impacts.</p>
Would the development affect the heritage asset in other ways?	<p>There is the potential for light and noise pollution associated with development and occupation of houses. However, this would need to be considered in the context of existing farming activity associated with the existing farm buildings and their use.</p>

Step 4. How to maximise enhancements and avoid harm	
Heritage asset 1 maximising enhancement	
Could the development improve public access to and interpretation of the heritage asset?	No
Would development enable further research and recording of the heritage asset?	No
Would development enable better revealing of the significance of the heritage asset?	No
Would development enable the asset to be removed from the at risk register?	No
Heritage asset 1 avoiding harm	
Are there reasonable alternative sites?	Yes
Could the site boundary be changed to avoid harm?	Yes
Could the amount of development be reduced to avoid harm?	Yes
Would a different type of development (use) avoid harm?	No
Could design avoid harm?	Yes
Notes	The farm house has an attractive elevation overlooking the site that clearly forms part of its setting. If the part of the site that lies immediately to the east of the farm is required to remain undeveloped, it would help retain the openness of the listed building (at least to some degree) and significantly reduce the potential for adverse impacts.

3 Site Reference Exmo_16

Site details

Settlement: Exmouth

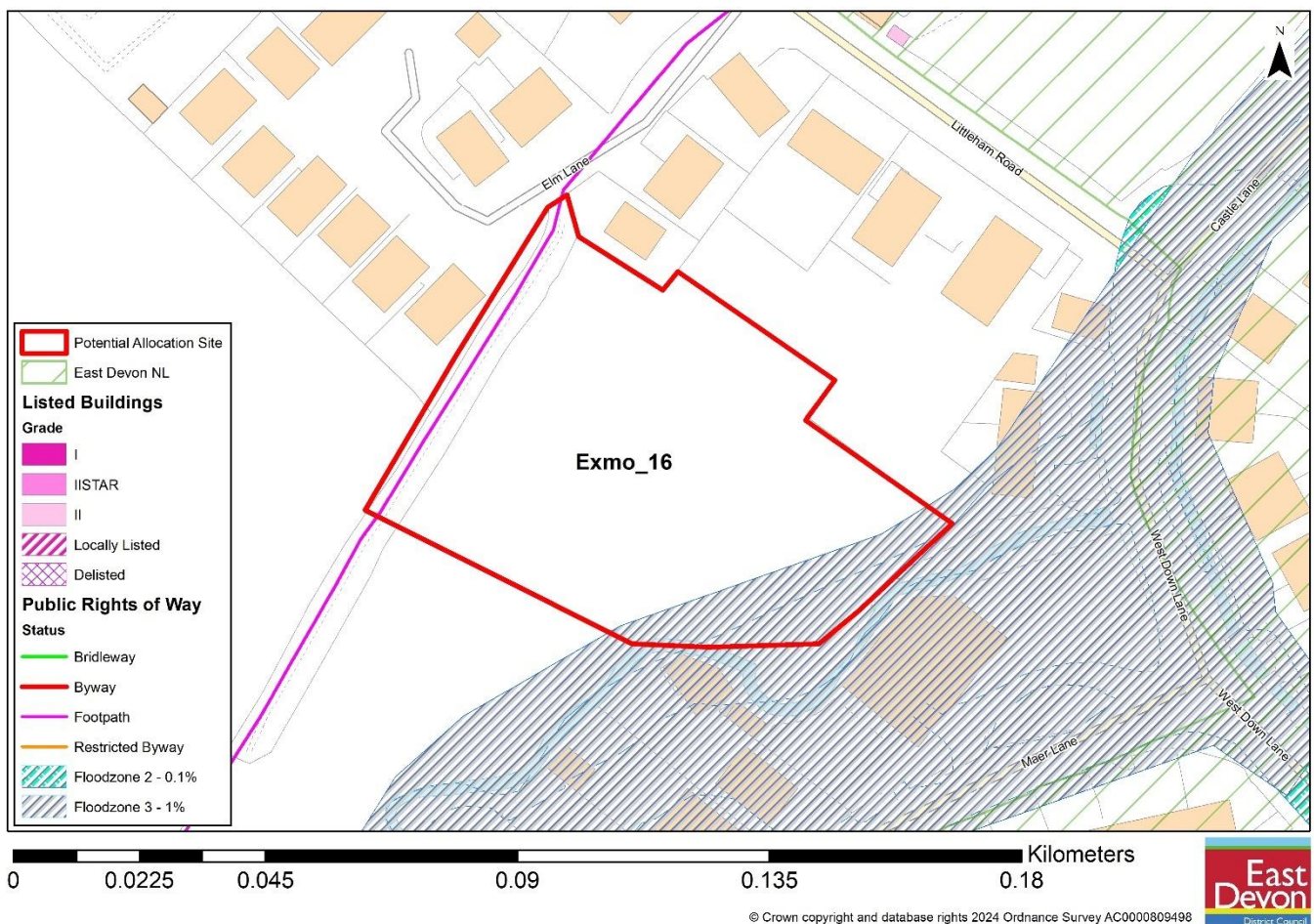
Reference number: Exmo_16

Site area (ha): 0.47

Address: Land to the rear of Elm Lane, Exmouth,

Proposed use: Housing development

Site map





The site comprises of most of the ploughed field shown in the photograph and runs up to the houses/field boundary in the background. There is no existing boundary feature on the ground, i.e. the photograph foreground, that defines the south-western boundary. The photograph is taken from the footpath along the north-western boundary of the site looking in a north-easterly direction.

Historic Environment Site Assessment

Notes on history of area

Mapping from the 19 century indicates that the site existed as part of an agricultural field. The site itself forms part of a much larger area that is identified on the Devon County Council Environment viewer as Littleham Manor, Exmouth. Text for the larger area advises "The bounds of the Saxon manor of Littleham equate fairly well with the later ecclesiastical parish."

Overall conclusion

Low: no concerns identified on current evidence, albeit it is noted that listed assets lie relatively close to the site though with little or nil intervisibility.

Step 1. Identify any heritage assets potentially affected	
Is the site within 100 metres of a designated heritage asset?	Yes There are listed assets close to the site.
Could development of the site affect any heritage asset (designated or non-designated) or its setting?	Yes
List any heritage assets potentially affected.	1. St Margaret And St Andrews Church, Castle Lane, Exmouth taken together with Lych Gate at the entrance to the church yard. 2. Tythe Cottage Tea Rooms, Littleham Village.

Step 2. Existing contribution of site to significance of heritage asset	
Heritage asset 1	
Description of asset	<p>1. St Margaret and St Andrews Church, Castle Lane taken together with Lych Gate at the entrance to the church grounds.</p> <p>The site lies to the west of these assets, around 100 metres from the church and 50 metres from the gate. The church, the listing advises, is Generally C15 Perpendicular but south chancel arches probably C14 and traces of C13 work also in chancel. West tower begun 1528. Nave, south chapel and porch and north aisle. Stone with stone tiled roof. Late C15 screens. Wall monument in south chapel to Frances Herbert Lady Nelson by Turnerelli. Altar rails of circa 1700. Some C15 stained glass and 3 south windows by Kempe 1893. South porch has sundial of 1780 above entrance and a reset mass scratch dial. Church restored 1884. It was inspected in 2004 and condition was reported as Good.</p>
Significance of asset and setting	<p>Negligible</p> <p>There is very little intervisibility between the site and the asset and potential for impacts from development are minimal.</p>
Relationship of site with heritage asset	<p>There is very little intervisibility between the site and the asset and potential for impacts from development are minimal. Whilst the Church tower may be visible from new development there is considerable screening from existing buildings and foliage.</p>
Level of contribution (site to heritage asset)	None
Further assessment required?	No

Step 3. Identifying potential impact on significance of heritage asset	
Heritage asset 1	
What impact would development have on the heritage asset and its setting?	No Change The site is visually screened by existing developments from the site so no adverse impacts are identified.
Could the site be developed in a way that minimised potential impact?	Not applicable.
Would the development affect the heritage asset in other ways?	No potential for adverse impacts are identified.

Step 4. How to maximise enhancements and avoid harm	
Heritage asset 1 maximising enhancement	
Could the development improve public access to and interpretation of the heritage asset?	No
Would development enable further research and recording of the heritage asset?	No
Would development enable better revealing of the significance of the heritage asset?	No
Would development enable the asset to be removed from the at risk register?	No
Heritage asset 1 avoiding harm	
Are there reasonable alternative sites?	Yes
Could the site boundary be changed to avoid harm?	No
Could the amount of development be reduced to avoid harm?	No
Would a different type of development (use) avoid harm?	No
Could design avoid harm?	No
Notes	The site has limited visual connectivity to the assets and as such no scope for enhancement is identified.

4 Site Reference Exmo_17

Site details

Settlement: Exmouth

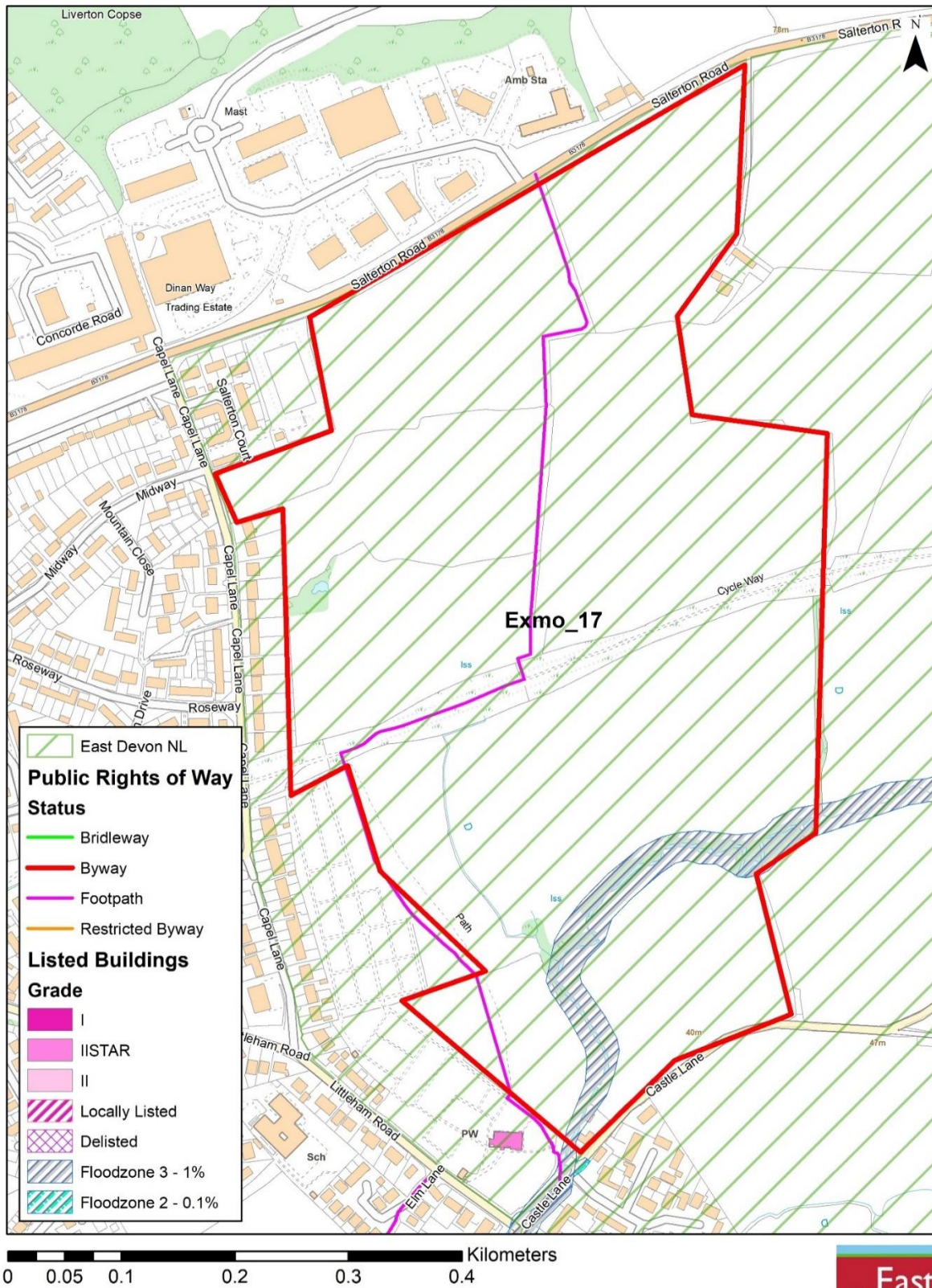
Reference number: Exmo_17

Site area (ha): 30.7

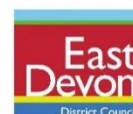
Address: Land to the South of Littleham, Exmouth,

Proposed use: Mixed use development for around 410 houses with additional and supporting uses (such as open space and SANGS)

Site map



© Crown copyright and database rights 2024 Ordnance Survey AC0000809498



Photos



The photograph is taken from the South West Coast Path mid-way between Budleigh Salterton and Sandy Park caravan park just below the trig. point at West Down Beacon. The site, occupying several fields, falls between Liverton Business Park (to the north/right) and Littleham Church (St Margaret and St Andrews Church) (to the south/left).



This photomontage shows one of the fields in the southern part of the site. Photograph(s) taken from the wall adjoining St Margaret and St Andrews Church, close to the southern tip of the site and looking in a northerly direction.



Views of the Church and Churchyard are limited from Castle Lane to the south and Littleham Road to the west.

Historic Environment Site Assessment

Notes on history of area

Mapping from the 19 century indicates that the site formerly comprised of a large number of agricultural fields. The site itself forms part of a much larger area that is identified on the Devon County Council Environment viewer as Littleham Manor, Exmouth. Text for the larger area advises "The bounds of the Saxon manor of Littleham equate fairly well with the later ecclesiastical parish."

Overall conclusion

As a large site, with scope for substantive parts to be left undeveloped and/or used for recreational purposes, allocations is seen as appropriate.

Step 1. Identify any heritage assets potentially affected	
Is the site within 100 metres of a designated heritage asset?	Yes There are listed assets close to the site.
Could development of the site affect any heritage asset (designated or non-designated) or its setting?	Yes
List any heritage assets potentially affected.	1. St Margaret And St Andrews Church, Castle Lane, Exmouth taken together with Lych Gate at the entrance to the church yard.

Step 2. Existing contribution of site to significance of heritage asset	
Heritage asset 1	
Description of asset	<p>1. Grade 2* listed St Margaret and St Andrews Church, Castle Lane taken together with Lych Gate at the entrance to the church grounds.</p> <p>The site lies to the east of these assets, a southern edge being around 16 meters at its closest to the church and abutting the church graveyard wall. The gate lies beyond, around 75 meters at its closest point. The church, the listing advises, is Generally C15 Perpendicular but south chancel arches probably C14 and traces of C13 work also in chancel. West tower begun 1528. Nave, south chapel and porch and north aisle. Stone with stone tiled roof. Late C15 screens. Wall monument in south chapel to Frances Herbert Lady Nelson by Turnerelli. Altar rails of circa 1700. Some C15 stained glass and 3 south windows by Kempe 1893. South porch has sundial of 1780 above entrance and a reset mass scratch dial. Church restored 1884. It was inspected in 2004 and condition was reported as Good.</p>

<p>Significance of asset and setting</p>	<p>High</p> <p>The allocation site is currently open land, in which there are glimpsed views from the churchyard of the Grade II* listed Parish Church of St Margaret and St Andrew. These views are limited due to the tall wall surrounding the churchyard. In terms of views towards the church, the church tower rises above the mature tree line and is a prominent feature when viewed from the east and north-east and has been part of the landscape since the 15th century (or even earlier). The church serves Littleham, which was a small settlement in a rural setting until the 20th century when the town of Exmouth expanded from the west. This expansion has gradually encroached up the setting of the church, with open views surviving to just the east and north-east where the allocation site is proposed. This encroachment is particularly evident when walking north-west through the churchyard where a row of existing mid-late 20th century dwellings which back onto the churchyard is highly prominent and harmful.</p>
<p>Relationship of site with heritage asset</p>	<p>The Church tower is very visible from much of the site but views of the Church building and Churchyard are far more localised due to ground levels and intervening foliage. It is most visually prominent in close by views from the south westerly part of the site although it is a clear feature in open views throughout the site.</p> <p>In many of the views, especially closer by ones, the church is viewed from, and is seen within, a rural setting and context with these adding to the quality of tranquillity.</p> <p>From public vantage points beyond the site, views of the Church and Churchyard from Littleham Road to the west and Castle Lane to the south are limited by intervening ribbon housing development, high hedges and foliage, the road level sits below ground level and this decreases intervisibility further.</p>

Level of contribution (site to heritage asset)	Significant
Further assessment required?	No

Step 3. Identifying potential impact on significance of heritage asset	
Heritage asset 1	
What impact would development have on the heritage asset and its setting?	<p>Major</p> <p>The loss of the only surviving area of open space would lead to a degree of harm to the setting of the church in terms of a slight visual impact, the loss of open space, noise and light pollution.</p> <p>The highest degree of harm would be at the southern end of the allocation site. Moving eastward away from the church and more notably moving northward the impacts would lessen and be low and in parts negligible.</p>
Could the site be developed in a way that minimised potential impact?	<p>Yes - The highest degree of harm would be at the southern end of the allocation site which a concept plan promoted by prospective developers shows as a SANG and a cemetery extension. These open spaces would go some way towards maintaining countryside views and a peaceful environment, protecting the setting of the church. Landscaping and tree/hedge planting along the west boundary of the development to the south of the former railway line will also help to protect the setting of the churchyard extension to the north of the church.</p>
Would the development affect the heritage asset in other ways?	<p>Adverse noise and general negative tranquillity impacts could arise.</p>

Step 4. How to maximise enhancements and avoid harm	
Heritage asset 1 maximising enhancement	
Could the development improve public access to and interpretation of the heritage asset?	Yes
Would development enable further research and recording of the heritage asset?	Potentially
Would development enable better revealing of the significance of the heritage asset?	No
Would development enable the asset to be removed from the at risk register?	No
Heritage asset 1 avoiding harm	
Are there reasonable alternative sites?	No- development opportunities are very limited around Exmouth
Could the site boundary be changed to avoid harm?	Yes, however including the area where the highest degree of harm could occur within the allocation boundary will enable it to be protected as SANGS and a potential cemetery extension. It is recommended that the allocation boundary be retained but policy requires these 'open space' uses to act as a protective buffer.
Could the amount of development be reduced to avoid harm?	Yes but this is not considered to be necessary
Would a different type of development (use) avoid harm?	No
Could design avoid harm?	Yes - requiring the southern end of the allocation site to be used as SANGS and a cemetery extension would go some way towards maintaining countryside views and a peaceful environment, protecting the setting of the church. Landscaping and tree/ hedge planting along the west boundary of the development to the south of the former railway line will also help to protect the setting of the churchyard extension to the north of the church.
Notes	The public benefits of providing landscaping and ecology enhancements are considered to outweigh any harm, subject to the scale, design and materials of the dwellings being carefully considered, and if necessary, repairs to the churchyard wall carried out to ensure it remains an effective barrier.

5 Site Reference Exmo_20

Site details

Settlement: Exmouth

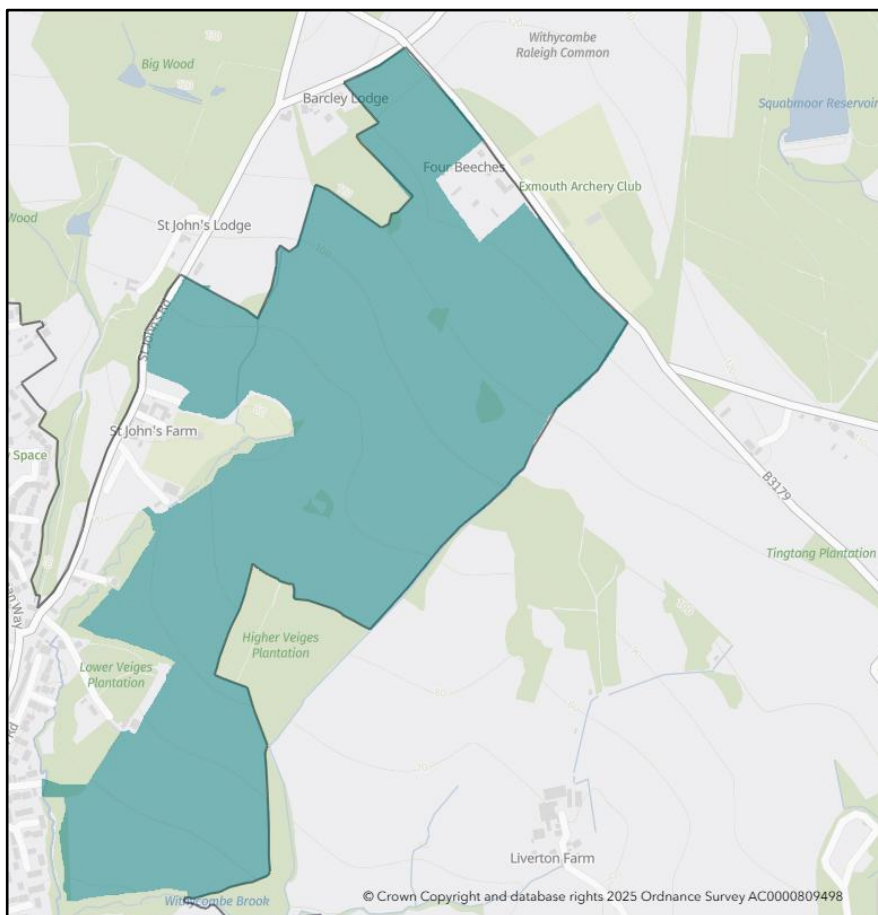
Reference number: Exmo_20

Site area (ha): 85.46

Address: Land at St.John's, Exmouth,

Proposed use: Housing with supporting mixed use development.

Site map



Please note that in the original version of this addendum report, published on-line on 26 November 2025, a map was published that showed the extent of land promoted for development by the site promoters. To avoid any potential confusion in respect of land

allocated for development in the 2nd Regulation 19 local plan an amendment has been made in this Version 2 of this document that has removed the original plan and replaced it with this new plan, map extract from the online Policies Map, that shows the extent of the allocated land, shaded in green, and the Settlement Boundary, black outline. The original map, that has been removed, can be seen in the original site assessment report - [sal-022-exmouth-site-selection-report.pdf](#) (section 10 of the report).

Photos



View from the B3179 at the eastern edge of the site looking west towards the Church. It is blocked from view by intervening planting



Above left -Withycombe Barton, Grade 2 listed house, photographed from St John's Road to the west of the site



Above right- Church of St John in the Wilderness, Grade 2* listed, photographed from the car park adj St John's Road, looking east

Historic Environment Site Assessment

Notes on history of area

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. Limited sections of building fabric date to the late fourteenth century, but the tower and northern aisle date from the fifteenth century.

Until the twentieth century, when suburban expansion loosely linked the hamlet of Withycombe Raleigh to Exmouth, the church was located in a rural landscape characterised by isolated farms and cottages.

Urban development has expanded outward, to the south of the site, over the recent decades to come close to the site boundary. However, and for the most part, extensive vegetation cover to and beyond southern site boundaries limits intervisibility with urban parts of the town. Much of the site reads as rural in character with central parts in particular defined by historic field boundaries and buildings and structures of heritage importance.

Overall conclusion

There is potential for significant harm, however the size of the site allows some flexibility in locating development where harm is reduced, carefully designing development and ‘buffering’ through the provision of open space and planting. Alternatively, if other constraints reduce the developable area of the site, the numbers could be reduced.

Either the allocation should be reduced to exclude parts of the site which would result in the greatest harm through erosion of openness and impact on peace and tranquillity, or more credibly policy should look to retain as open space. This would affect the land and hillside to the east of the main churchyard and land to the north and north east of the churchyard.

Step 1. Identify any heritage assets potentially affected	
Is the site within 100 metres of a designated heritage asset?	Yes
Could development of the site affect any heritage asset (designated or non-designated) or its setting?	<p>The following listed buildings fall close to the allocated site:</p> <ul style="list-style-type: none"> • The Grade II Star - Church Of St John In The Wilderness • The Grade II - Barton House • The Grade II St John’s Lodge <p>The church is of greatest relevance.</p>

List any heritage assets potentially affected.	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.
Step 2. Existing contribution of site to significance of heritage asset	
Heritage asset 1 - • The Grade II Star - Church Of St John In The Wilderness	
Description of asset	ST JOHN'S ROAD (South-East Side) Withycombe Raleigh 6/79 Church of St John- in-the-Wilderness 6.12.49 GV II*(Star) ST JOHN'S ROAD 1. 5176 (South-East Side) Withycombe Raleigh Church of St John- in-the-Wilderness SY 08 SW 6/79 6.12.49. GV 2. Originally the C15 parish church, largely demolished circa 1748. The tower and part of the north aisle remained but the rest has been skilfully reconstructed. West tower of sandstone with crenellated parapet. String courses, angle buttresses and polygonal staircase turret. Church windows generally Perpendicular style. Small 2 bay chancel. Inside, a carved C15 capital remains at the west end of the nave arcade. Said to have been founded in C13 but some Norman fragments on a window sill. Listing NGR: SY0281483370
Significance of asset and setting	High significance
Relationship of site with heritage asset	Adjoins local plan allocated land.
Level of contribution (site to heritage asset)	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 leave appropriate buffers undeveloped. Whilst there are some modern areas of development close to the southern site boundaries for the most part the site sits within a rural context with a mixture of on-site historic field boundaries and some modern enlarged fields. Listed buildings are within/close to the shown site, of most

	<p>significance is the Church of St John in the Wilderness</p> <p>Wild, tranquil, relatively exposed and open site. From within parts of the site there are some views of built-up areas in Exmouth, though the overall feel is one of undeveloped countryside.</p>
Further assessment required?	No on the basis that the most significantly affected areas of the site have been identified. This will need to be reflected at planning application stage.

Step 3. Identifying potential impact on significance of heritage asset	
Heritage asset 1	
What impact would development have on the heritage asset and its setting?	Major – Inappropriate development could have significant adverse impacts.
Could the site be developed in a way that minimised potential impact?	Yes – the site is very large and given the overall size of the site significant open space buffer areas could be left around the church that lessen significantly the potential for adverse impacts. On a similar level, given site size, careful account could be taken of any open view points and vistas, with appropriate open space and development forms promoted, to lessen or minimise potential for adverse impacts.
Would the development affect the heritage asset in other ways?	Increased human activity associated with development, including traffic, could adversely impacts on the solitude offered by the site and from which it benefits and which helps define its character.

Step 4. How to maximise enhancements and avoid harm	
Heritage asset 1 maximising enhancement	
Could the development improve public access to and interpretation of the heritage asset?	This would seem as unlikely, though perhaps there could be marginal benefit from greater public access.
Would development enable further research and recording of the heritage asset?	This would appear unlikely.
Would development enable better revealing of the significance of the heritage asset?	This would appear unlikely.
Would development enable the asset to be removed from the at risk register?	Not applicable.
Heritage asset 1 avoiding harm	
Are there reasonable alternative sites?	There are limited sites for consideration for development in Exmouth.
Could the site boundary be changed to avoid harm?	Yes – in effect the site is large so boundary changes could be made although the National Landscape lies to the north/north-east of the site and, more distantly to the south and east. Heritage assets lie to the centre and east of the site. It will be difficult to reduce the site area and buffer these areas whilst maintaining housing numbers.
Could the amount of development be reduced to avoid harm?	Potentially yes
Would a different type of development (use) avoid harm?	This would appear unlikely.
Could design avoid harm?	Careful design and ‘buffering’ through the provision of open space and planting could mitigate/avoid harm. This is likely to reduce site capacity. Views from the churchyard are limited to the south but there are distinct views of a steep open hillside leading up to a wooded area at the top of the hill to the east from the main churchyard, development at a higher level on this hillside would certainly harm its setting by significantly eroding the openness and green landscape. Development of land to the north and north east of the Churchyard will result in a lower degree of harm but would still impact negatively upon the peace and tranquillity of the Church and Churchyard setting.

It is highlighted that there are two other listed properties that are at/close to the site.

- Barton House – Grade II - Mid to late C19. Large red brick house roofed with fishscale and plain tiles. Large southern end gable with triple chimney and blind arch in gable. Additional end chimney

of similar design. 2 storeys. 5 windows with cambered head linings and leaded glazing. 3 gables to attic dormer windows, the outer 2 break through eaves. Open gabled wooden porch. 1 storey outshut at north side. Gothic arched brick porch on side elevation which faces approach to the Church of St John in the Wilderness .

And

- St John's Road Higher Lodge – Grade II - Early C19. Cottage ornee. Colourwashed stucco with hipped thatched roof. Facade to drive clad in rustic logs. 1 storey. 2 windows, small centred bays with early C19 casements. Centre thatched porch with hipped roof. 1 canted bay window faces road. Listing NGR: SY0282683765.

These assets lie close to the church (beyond it, so further away from the main development site) and are of a lesser grade. The considerations, above, that apply to the church (for asset 1) would be applicable to these assets, though impact concerns are of a lower concern.

Noting concerns identified in respect of this site further assessment was undertaken and this features in a report to Strategic Planning Committee on 2 September 2025 - [2. Local plan assessment of potential plan changes V2.pdf](#). By way of further site assessment the text below has been taken from the committee report. It provides a more nuanced assessment of the suitability of the site to accommodate development.

Exmo_20 - Land at St John's - Exmouth

7.8 This site on the north-eastern side of Exmouth is physically close to the built form of the town and southern site parts in particular are visually very well screened by mature planting within the site and to site boundaries. The site provides significant mixed-use development potential and is accessible (will be with the proposed new access), especially southern parts, to a range of existing facilities.

7.9 Main issues raised during the consultation included: • Harm to the Pebblebed Heaths SAC/SPA: concerns include air quality, recreational pressure, and habitat fragmentation. (Devon Wildlife Trust, RSPB, Natural England, Environment Agency, Individuals) • Loss of biodiversity, ancient woodland, and wildlife corridors. (Devon Wildlife Trust, Individuals) • Adverse impact on the setting of St John in the Wilderness Church (Grade II*) and other heritage assets. (Historic England, Individuals) • Loss of tranquillity, dark skies, and rural character. (Historic England, Individuals) • Flood risk due to clay soils and upstream location relative to Withycombe Brook. (Environment Agency, Individuals) • Poor access from B3179 and Southern Wood; concerns about traffic, safety, and sustainability. (Devon County Council, Individuals) • Unsustainable location due to distance from services and facilities. (National

Highways, Individuals) • Allegations of procedural flaws: site not properly consulted on at Regulation 18 stage. (Individuals, Community Groups) • Support for the allocation and its deliverability. (Planning Consultant/Developer)

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

Landscape considerations at Exmo_20

7.11 With respect to landscape considerations Exmo 20 is a very large site situated to the east of St Johns Road. The northeastern boundary abuts the B3179 and the East Devon National Landscape. The eastern boundary is mostly set back from St John's Road with only one field within the site providing direct frontage onto it. The site boundaries encompass an area of 84.8ha of which preliminary proposals prepared by the promoter indicate 41.5ha will be developed.

7.12 The site has a south-westerly aspect with the highest fields situated on a plateau edge which falls away moderately steeply down through the site. An undulating landform below the plateau together with blocks of woodland, substantial hedges and small copses within and around the site generally limit views out to the fields on the plateau at the northeastern end which afford distant views to the sea and across the Exe estuary. There are also views across the town and Exe Estuary from the higher fields below the plateau.

7.13 A 400m development buffer is required to be provided from the boundaries of the SPA/SAC. As this coincides with the higher, more open parts of the site, maintaining it clear of development will also help to reduce landscape and visual impact of the development in the wider landscape.

7.14 There is some potential for partial views of the developable parts of the site from the National Landscape on higher ground between Salterton Road and the coast. There are also views across the site from a short section of St Johns Road where the site boundary abuts it.

7.15 The site is somewhat set apart from the built-up area of Exmouth and possible locations for vehicular access are limited. St Johns Road is narrow, tree lined and lacks width for footways. The only alternative with the current land available is to create an access off the B3179. The creation of a new road in this location with associated kerbing, footways and visibility splays could have localised adverse impacts on the National Landscape. These should be minimised by sensitive design, avoiding streetlighting between the junction and lower, developable parts of the site and provision of appropriate mitigation planting including new hedge banks and woodland creation.

7.16 The site currently affords poor opportunities for active travel connections. As an access from the B3179 would be somewhat remote from local services, new cycle and pedestrian links should be provided onto St Johns Road to the east and also to the Meadow View estate from the southwest corner of the site. The latter would offer onward links to Liverton Business Park and Salterton Road.

7.17 There is opportunity for heathland creation on higher land at the northeastern end of the site as landscape enhancement. Existing hedges and trees within the site should be retained and reinforced with additional planting and habitat creation. Natural England require fencing/ buffering of any onsite SANG from the SAC/SPA albeit the main site access from the B3179 will be situated opposite designated access land on the Pebble Bed heaths. Conversely, however, site development could enhance active travel links from the town to the Pebble Bed heaths.

7.18 Policy SD01 states that no development that would result in an unacceptable impact will be permitted within 400 metres of the Pebble bed heaths. However, there is no mention of the relationship of the site to the national landscape and the policy could be improved by highlighting the importance of addressing the setting of the national landscape are incorporated into the development. Policy should also restrict street lighting along the proposed access road serving the site and require provision of foot/ cycle path links to the Meadow View estate and Liverton Business Park and/ or appropriate financial contributions towards securing these.

7.19 There are, therefore, landscape concerns that we do need to be aware of but these can be dealt with through policy refinement that will lead to a high-quality comprehensive masterplan. Furthermore, given how well screened the site is (specifically the southerly site parts that are proposed for development) there is very little intervisibility with surrounding areas.

Mineral considerations at Exmo_20

7.20 We would also wish to highlight a minerals consideration that applies to this site, as raised in comment by Devon County Council, as the minerals planning authority. The County Council highlighted that the northern part of the site falls within a mineral safeguarding area, around which, and of a slightly larger area, is a county council defined Mineral Consultation Area. This consultation area mostly coincides with, though is slightly larger than, the Pebblebed Heaths 400 metre zone.

7.21 The Devon Minerals Plan seeks to ensure that sufficient and appropriate amounts and types of minerals are safeguarded and can be extracted to meet future needs, should demand arise and extraction is commercially and technically viable.

7.22 The role of safeguarding areas is to ensure that non-mineral development does not sterilise or constrain future mineral extraction. There can, however, be exceptions where a technically robust and objective Mineral Resource Assessment is undertaken by a qualified person that demonstrates that extraction of the mineral resource has no current or potential economic value, when prior extraction takes place, or where the use is temporary and will be removed prior to any future mineral working. This reflects Policy M2 of the Devon Minerals Plan.

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

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



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

Heritage considerations at Exmo_20

7.26 There is a statutory obligation to have special regard to the desirability of preserving listed buildings and their settings and this is especially pertinent as St John in the Wilderness Church, a Grade 2* listed building, adjoins Exmo_20. Development would not directly impact the listed building itself but has the potential to significantly harm its setting.

7.27 Setting can be described as the surroundings in which an asset is experienced and may therefore be more extensive than its curtilage. The extent and importance of setting is often expressed by reference to visual considerations, including views of or from an asset and the way in which the asset is experienced in its environment. The policy objectives in the NPPF and the PPG establish the twin roles of setting: it can contribute to the significance of a heritage asset, and it can allow that significance to be appreciated. An assessment of the impact on the setting of the Church has been undertaken, and takes into account the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

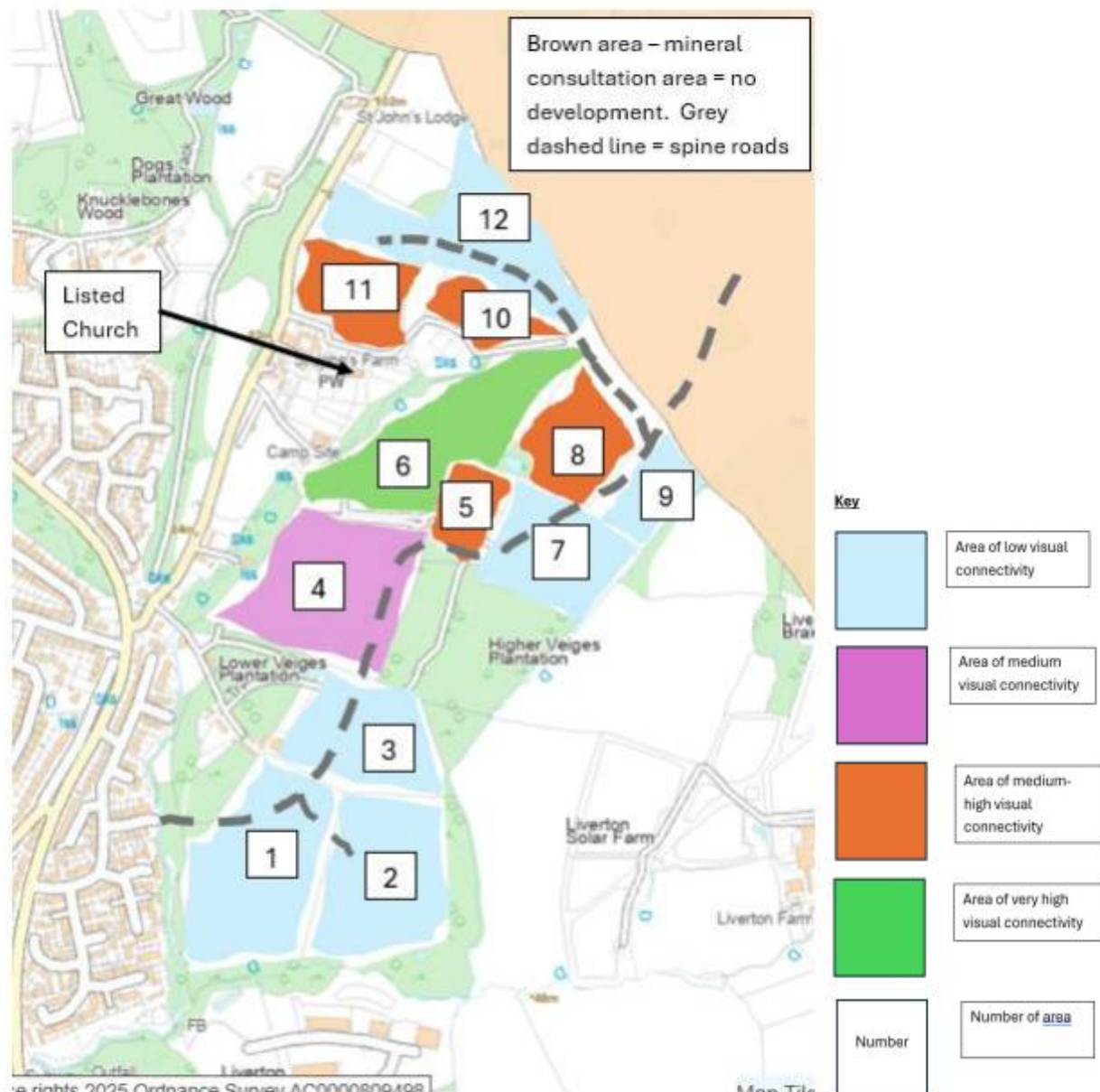
7.28 Historic England advise that “Being tall structures, church towers and spires are often widely visible across land and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view.”

7.29 This element of analysis specifically assesses the visual connectivity, and in this respect sensitivity, to development of separately identified land parcels to the St John in the Wilderness church. Assessment is based on ground level assessment (human eye level) from points within the churchyard. The church tower is not particularly high and will have limited public access but from the top of the tower more expansive views would be expected bearing in mind that, by design, the church tower is meant to be widely seen and to dominate the landscape.

7.30 The assessment is based on visibility of the ground level in adjoining nearby land areas and considers the height of buildings and their potential impact in terms of elevation. Recognising that the field pattern has changed very little since the church was largely rebuilt in 1748 (and little changed since its original construction in 1348), the identified land parcels are for the most part based on existing historic field boundaries, though in some cases fields/areas that have similar characteristics/visual connectivity have been merged. In other cases fields are split where differing characteristics exist. Only the main fields are captured in the assessment, there are some smaller pockets of land that fall between these that have not been assessed and as such could be looked upon as extras.

7.31 We have identified four area types in terms of visual connectivity: • Very High – areas that are visually very well connected and unsuited to development • Medium-high – areas where all or parts of a site have a clear visual link. • Medium – areas where there are parts of the site that

have a visual link, but of lesser prominence/proximity. • Low – areas where there is either nil visual link or at most it is only in longer distance views.



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

7.32 These areas are shown on the map below/over along with sensitivity conclusions reached. A site visit was undertaken in August 2025 and as a broad-brush observation it should be noted

that the boundaries to the graveyard surrounding the church, both the original graveyard and a more recent extension to the east, are very heavily planted with both deciduous and evergreen trees. The extent and density of planting means that in the summer months there are limited views and intervisibility with surrounding fields. In the winter, with the falling of leaves, this will increase but even then the evergreens and mass of branches on the deciduous trees will result in a retained degree of screening. Above – Map showing areas of the site by visual connectivity to the listed church. For further details see table following para. 7.39

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

7.34 The site assessment work needs to be seen and read in the context of the way that the church and churchyard sit within the landscape and specifically the mature dense vegetation that limits views.

7.35 We have undertaken some finer grained assessment of comparative sensitivity of different site parts to inform possible overall capacity. For this work we have worked on a net density assumption of 40 new homes being built per hectare for those areas with a low visual connectivity. For areas with very high and medium-high visual connectivity we have assumed zero dwellings - such areas could remain as open space to serve development. For areas ranked as medium we have run two scenarios, one at a low figure 20 homes per hectare and the other at zero. The 20 homes per hectare would provide for either low density-built development (for example homes in large plots, perhaps single storey in potentially more sensitive areas) and/or it could provide for areas of green space accessible to the public and some more typical density new homes (for example open space in more sensitive parts and homes in less).

7.36 Assessment work undertaken as part of the sustainability appraisal of the Cranbrook Plan – see Appendix 3 of Cranbrook Development Plan: Issues and Options Report shows net density levels, at the time of assessment for homes built, averaging just over 40 dwellings to the hectare. The net area being defined as including: • houses and gardens; • car parking courts •

estate roads and footpaths; • incidental open space – including small play spaces and other local green spaces.

7.37 The net areas exclude larger scale, strategic and non-residential features such as strategic highways and access roads, major landscaping areas and parkland, playing fields, schools, community and businesses uses and larger scale play areas. For strategic highways and access roads (noting an indicative spine road is diagrammatically shown on the map) we have assumed a substantive area with a width of 15 metres that is discounted from recorded area totals.

7.38 It is stressed that this work is not a formal detailed assessment and in no sense is it intended to form policy or establish any specific set of proposals or patterns for development. Rather it is illustrative and approximate of comparative areas of sensitivity and is set out as a means to illustrate the scale or level of development that could potentially be achieved by directing development to the less or nil sensitive locations only. It is worth highlighting, however, that development when well designed and implemented can frame and enhance heritage assets and as such 'sensitive areas' can in some cases be appropriate and positive for development and built uses.

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

Table of assessment if identified areas

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

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

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

Please note that since the original version of this addendum report was published, on-line on 26 November 2025, it was highlighted that the totals row in the above table was incorrect. Whilst the table above remains as originally published the actual totals have been recalculated and should be – Net area in hectares = 35.28 hectares, Homes total (higher level scenario) = 883 and Alt homes total (lower level scenario) = 793.

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

Please note that since the original version of this addendum report was published, on-line on 26 November 2025 and in line with commentary relating to the table on the preceding page the above should be read bearing in mind the following:

- a) On the 2nd line - the 848 number should say – 883*
- b) On the 8th line – the 748 number should say – 783*
- c) On the 10th line – the 792 number should say – 793 and the 692 number should say 693.*

6 Site Reference Exmo_47

Site details

Settlement: Exmouth

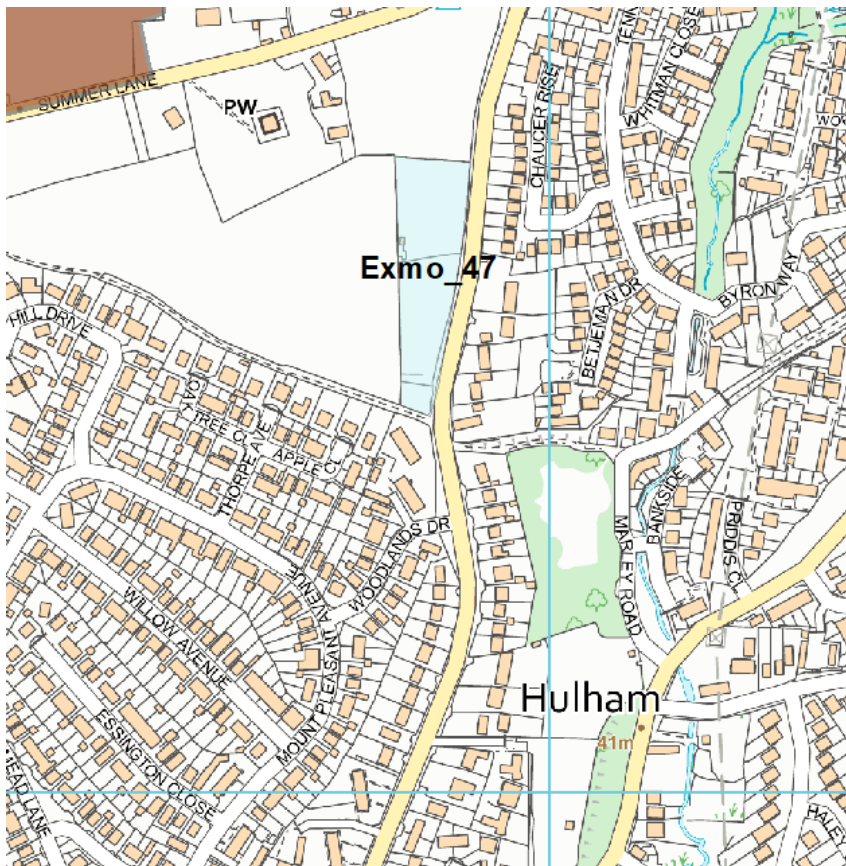
Reference number: Exmo_47

Site area (ha): 0.81

Address: Land to the west of Hulham Road, Exmouth, EX8 5BB

Proposed use: Residential

Site map



Photos



Site outlined (approximately) in red showing relationship with surrounding areas, including Point-in-View and A La Ronde. Image form Google Earth.

Historic Environment Site Assessment

Notes on history of area

To the south and east of the site there is 20th century predominantly residential development. To the north and west are heritage assets of national importance.

The site was formerly part of the A La Ronde, and The Point-In-View Historic Park or Garden (List entry – 1000686), but on the 19 January 2024 Historic England advised of its de-classification. This de-classification followed review of whether the field/s were consciously designed within the context of the park/garden setting of the properties. The conclusion was that they were not. Notwithstanding this de-classification the designated area abuts the site and, as such, it retains heritage importance forming part of the setting of the listed buildings.

Overall conclusion

Development of this site has the potential to impact upon the setting of the adjoining Grade 2 listed Park and Garden, associated with a group of nearby Grade 1 listed buildings. In particular any adverse impacts could specifically impact on the peace and tranquillity of the area. Whilst allocation for

development is appropriate specific care will be required at the planning application stage to secure high quality development.

Step 1. Identify any heritage assets potentially affected	
Is the site within 100 metres of a designated heritage asset?	Yes
Could development of the site affect any heritage asset (designated or non-designated) or its setting?	Yes
List any heritage assets potentially affected.	The site abuts the A La Ronde, and The Point-In-View Historic Park or Garden (List entry – 1000686) (Heritage Asset 1). The Grade I listed buildings at Point-in-View (Heritage Asset 2) are within 100 metres of the site. A-La Ronde, also Grade 1 listed is around 450 metres from the site.

Step 2. Existing contribution of site to significance of heritage asset	
Heritage asset 1 - A La Ronde, and The Point-In-View Historic Park or Garden (List entry – 1000686)	
Description of asset	A La Ronde and The Point-In-View Historic Park or Garden (List entry – 1000686)
Significance of asset and setting	The asset is a Grade II – Park and garden – summarised as - Developed in the late C18 and early C19 with further alterations in the late C19, A La Ronde and the associated grounds of the chapel, Manse and almshouses known as The Point in View, form a Regency ferme ornée. Ornamental landscape features are combined with more practical paddocks, orchards and kitchen gardens creating an ornamented estate.
Relationship of site with heritage asset	<p>The site abuts the asset on its northern and western boundaries. The allocation site is close to the Grade I Point in View Chapel and Grade I The Manse, also historically part of the gardens associated with this and Grade I A La Ronde. There are a pair of modern semi-detached cottages to the south of The Manse, between this building and the site.</p> <p>When viewed from the Chapel, there is no intervisibility between this and the site as the land drops off to the south and there are mature trees on the south boundary of the chapel site. There may be some visibility between the LP site and the rear of The Manse so this would need to be carefully considered at planning application stage.</p>
Level of contribution (site to heritage asset)	Significant
Further assessment required?	No

Step 3. Identifying potential impact on significance of heritage asset	
Heritage asset 1	
What impact would development have on the heritage asset and its setting?	The site, despite abutting the asset, is visually well screened from it and the lie of the land and site slope falls away from the asset. However, the impact on the setting of the designated park is such that development on this linear site could lead to an unacceptable level of harm to its peacefulness and tranquillity unless careful design work and a landscaping scheme can reduce the harm to an acceptable level. There will need to be careful consideration at the planning application stage in respect to this consideration,
Could the site be developed in a way that minimised potential impact?	Yes, but further details would be required through detailed design work.
Would the development affect the heritage asset in other ways?	No

Step 4. How to maximise enhancements and avoid harm	
Heritage asset 1 maximising enhancement	
Could the development improve public access to and interpretation of the heritage asset?	No
Would development enable further research and recording of the heritage asset?	No – unlikely.
Would development enable better revealing of the significance of the heritage asset?	No
Would development enable the asset to be removed from the at risk register?	Not applicable.
Heritage asset 1 avoiding harm	
Are there reasonable alternative sites?	No - although this site is of a limited scale
Could the site boundary be changed to avoid harm?	No – though sensitive development to northern and western boundaries could lessen possible scope for adverse impacts.
Could the amount of development be reduced to avoid harm?	No
Would a different type of development (use) avoid harm?	No
Could design avoid harm?	Yes – careful design will be appropriate.
Notes	
