



South Devon
National
Landscape

Partnership Meeting

to be held at

10am on Friday 13 March 2026

Repton Room at Follaton House and via Zoom

Agenda & Papers

South Devon National Landscape team, Follaton House, Totnes, TQ9 5NE
Telephone 01803 229330 Email enquiries@southdevon-nl.org.uk

South Devon National Landscape Partnership membership:

Members nominated by local authorities

Devon County Council	Cllr Louise Wainwright Cllr Jacqueline Fry (officer advising Doug Eltham)
Plymouth City Council South Hams District Council	Peter Hawking-Sach Cllr Georgina Allen Cllr John McKay (officer advising Drew Powell)
Torbay Council	Cllr Christine Carter (officer advising Tracy Brooks)

Members nominated by statutory agencies

Environment Agency	Dave Shorten
Forestry Commission	Matthew Odgers-Brown
Historic England	Ross Simmonds
Natural England	Becky Hughes

Members co-opted by the Partnership Committee

Independent	Peter Sandover (Chair)
National Trust	Richard Snow
Plymouth University	John Martin (Vice Chair)
South West Coast Path Association	Julian Gray
Devon Campaign to Protect Rural England	Penny Mills

Community Representatives

Business community	Peter Moore
Coast and marine sector	Richard Stones
Community/voluntary groups	Jane Nichols
Environmental organisations (NGOs)	vacant
Landowning/farming community	Leah Harris
Parish Councils	Peter Hinchliffe
Tourism community	Laura Campbell

National Landscape team staff attending

Manager	Roger English
Adaptation Manager, Slapton Line Partnership	Lou Hoskin
Life on the Edge Project Manager	Rob Skinner
FiPL / Farm Engagement Officer	Alice Wyness
Office Manager	Vanessa Gray

Agenda

Item 1	Slapton Line: post storms response and recovery A briefing for National Landscape Partnership members	Verbal
The formal meeting and live recording to YouTube immediately follows the briefing and any statements from members of the public.		
Item 2 (5 mins)	Introductions & apologies for absence	
Item 3	Declarations of Interests	
Item 4 (5 mins)	Minutes of the last Partnership meeting (28 November 2025) for approval and any matters arising	Page 2
Item 5 (5 mins)	Summary of the Slapton Line briefing	Verbal
Item 6 (5 mins)	Partnership matters 6a) Partnership Chair's report	Page 13
Item 7 (15 mins) (15 mins) (5 mins) (5 mins)	National Landscape management 7a) Farming in Protected Landscapes 7b) Life on the Edge Project 7c) Review of the National Landscape Management Plan 7d) SDNL Team priorities for action 2026/27	Page 15 Page 19 Verbal Verbal
Item 8 (25 mins)	Partner updates – partner contributions to conserving and enhancing the natural beauty of the South Devon National Landscape and delivering on area of outstanding natural beauty Management Plan priorities – recent, current and planned.	Page 24 & Verbal
Item 9 (5 mins) (5 mins) (5 mins) (5 mins) (5 mins)	National & Regional Matters 9a) Environmental Improvement Plan 9b) Consultation on draft revised National Planning Policy Framework 9c) UK Living Heritage inventories – call for submissions 9d) Protected Landscapes Partnership: Landscape Observatory 9e) National Landscape Association priorities for action 2026/27	Page 26 Page 28 Verbal Verbal Verbal
Item 10 -	For Information 10a) Planning applications – consultations	Annex

ITEM 4 APPROVAL OF MINUTES & MATTERS ARISING

MINUTES OF THE MEETING OF THE SOUTH DEVON NATIONAL LANDSCAPE PARTNERSHIP HELD AT FOLLATON HOUSE AND VIA ZOOM ON FRIDAY 28 NOVEMBER 2025

1. INTRODUCTIONS & APOLOGIES FOR ABSENCE

Those present were:

Cllr Georgina Allen	GA	South Hams District Council
Cllr John McKay	JMc	South Hams District Council
Cllr Louise Wainwright	LW	Devon County Council
Doug Eltham	DE	Devon County Council
Cllr Christine Carter	CC	Torbay Council
Dave Shorten	DS	Environment Agency
Becky Hughes	BH	Natural England
Peter Sandover	Chair	Independent
Richard Snow	RS	National Trust
John Martin	Vice-chair	University of Plymouth
Jane Nichols	JN	Representative: community or voluntary groups
Leah Harris	LH	Representative: landowning and farming
Peter Hinchliffe	PH	Representative: parish and town councils
Laura Campbell	LC	Representative: tourism

National Landscape staff attending:

Roger English	NLM	NL Manager
Vanessa Gray		NL Office Manager (meeting assistance & notes)

Apologies for absence were received from:

Drew Powell	South Hams District Council
Cllr Jacqueline Fry	Devon County Council
Tracy Brooks	Torbay Council
Chris Avent	Plymouth City Council
Matthew Odgers-Brown	Forestry Commission
Pete Moore	Representative: business community
Richard Stones	Representative: coast and marine
Ed Parr Ferris	Representative: environmental organisations (NGOs)

Observers:

Observers were requested to follow the meeting live via YouTube.

2. PUBLIC STATEMENTS

No public statements.

3. DECLARATIONS OF INTERESTS

No conflicts of interest declared.

4. MINUTES OF THE 19 SEPTEMBER 2025 PARTNERSHIP MEETING FOR APPROVAL & ANY MATTERS ARISING

4.1. TO APPROVE THE MINUTES OF THE PARTNERSHIP MEETING HELD 19 SEPTEMBER 2025

Proposed: Doug Eltham
Seconded: Cllr Louise Wainwright
Resolved: No objections, the minutes were approved.

4.2. Matters arising:

- i. The Management Plan Vision Workshop covered the Special Qualities set to some extent. There is some Special Qualities work with Tracy Brooks, specifically to do with Brixham Urban Fringe, the latest Local Plan and evidence the base for landscape character.

ACTION 1 (NL Manager): Contact Tracy Brooks at Torbay Council.

- ii. Management Plan – The NL Manager has submitted a letter to Defra for a six month extension beyond the 31 December 2025 deadline.

iii. Access for All, Removing Barriers

Accessible picnic benches

- a. Ten sites have taken this up and more can now be made available in this financial year; news of this will be sent round to parish councils.
- b. Work is underway to add accessible picnic bench locations to the SDNL website.
- c. Peter Hinchliffe gave his thanks on behalf of the parishes that have received these benches from the SDNL using Defra's Access for All funding.
- d. The NL Manager requests that Partnership members let him know of any Access for All projects worth pursuing as soon as possible.

ACTION 2 (all): Let the NL Manager know of any suitable A4A projects as soon as possible.

- iv. Plymouth Plan for Nature and People – via EWCO, landowners are incentivised to establish woodland close to settlements and to provide site access. Additional contribution (i.e. above and beyond capital costs and maintenance) available £3,700 per ha.

- a. **ACTION carried forward:** Matthew Odgers-Brown to ask the Woodland Officer to send details of the scheme to Cllr Jacqueline Fry.

v. Undergrounding of Overhead Power Lines

ACTION carried forward: Forward potential locations for undergrounding to the National Landscape Manager.

vi. National Landscapes Association position statement on housing

ACTION carried forward: Not yet finalised so the action to circulate this is carried forward.

5. PARTNERSHIP CHAIR'S REPORT

Item 5 in the papers provided a summary of activity over the last few months undertaken on behalf of the National Landscape Partnership by the Chair, Peter Sandover.

Partnership members are recommended to note the report and are encouraged to provide brief reports where possible in advance of scheduled meetings to assist with the Partner updates agenda item.

The Chair read out a supplementary report

- i. Last Wednesday I attended a presentation at East Portlemouth parish hall arranged by a local farmer, James Jones of Rickham Farm explaining his sustainable and organic farming strategies working with a range of Defra programmes and most recently wild flower planting with the National Trust and Life on the Edge, Sam and Nicky of LotE and Emma of NT gave good engaging presentations to a large audience of farmers, land owners, parishioners and the local community. A very effective way of engaging the community.
- ii. **Feedback from the National Landscapes Association Chairs and manager's conference:**
 - a. Good presentations, sharing information with other National Landscapes particularly on Dark Sky strategies, nature-based solutions to flooding and Nature Recovery.
 - b. **Nathalie Prosser Chief Executive Officer of the Office for Environmental Protection (OEP)** which holds government and other public bodies to account on protecting and improving the environment - conclusion not doing well, so lots of scope for improvement. Specifically relating to Protected Landscapes, Place Matters, messages on climate and nature particularly net zero and biodiversity do not at present cut through. 'We spend a lot of time talking to ourselves' rather than engaging with broader audiences.
 - c. **Richard Hebditch** Better Planning Coalition- helping us wade through a plethora of legislation. Clearly ongoing pressures on National Landscapes. The statement from Steve Reed Secretary of State for Housing, Communities and Local Government to 'Build Baby Build' is reverberating through government departments and creating unresolved tension between deregulation and planners. There is effective lobbying for deregulation. The Protected Landscapes challenge is to respond in a positive way to win public support.
 - d. **Mary-Ann Ochota President of the CPRE** - A prospective and provocation of the National Landscape - 10 things to consider:
 - Not enough people know what National Landscapes are (many think it's the National Trust)
 - Terminology confusing to the public
 - Beauty doesn't help, nor does tranquillity - nature looks and feels different for everyone
 - Are we doing a Mick Hucknell? (holding back the years!)
 - Inclusion should be our core business
 - Celebrate cultural diversity
 - More collaboration
 - Despite the complexities keep our message simple (elevator pitch)- a hopeful and joyful message
 - There are over 100 rural MPs- we need to engage them more effectively

- A change in mindset is needed
- e. **Ruth Larby Head of Policy and Advocacy National Landscapes Association** - addressing the challenges leading and shaping a proactive narrative about National Landscapes. Addressing ongoing pressures on National Landscapes, Local Government Reorganisation, Funding Reform, Legislation and Policy Reform, a second Planning and Infrastructure Bill and possible Nature Bill. The need for a governance review was included in the Glover Review. The presentation and discussion led to a resolution at the AGM for the NLA to 'explore options for building increased autonomy and resilience into the NL Operating Model'.
- iii. **Succession Planning:** In March I will have completed my 3 year term. I and Vice Chair John Martin are up for reappointment or otherwise. I am happy to put myself forward to continue but cannot commit to a further 3 years, nor do I want to get in the way of others wishing to take up the role. John has been Vice Chair for a number of years and on the Partnership for some 15 years and is stepping aside but his input and our valuable links to Plymouth University are not lost as he will remain the representative of the University on the Partnership. We want to create an opportunity for existing members and others to move into these roles and shortly we will be inviting nominations for both positions. In discussion with John, we realised that the roles and responsibilities are only loosely defined in the SDNL Constitution and we will be giving some thought with The NL Manager to this and add more responsibilities to the Vice Chair Role.

ACTION 3 (NL Manager and Chair): Look at definition of the roles and responsibilities for the Chair and Vice-chair roles prior to inviting nominations.

Matters arising

- i. The Office for Environmental Protection are currently concluding an investigation into designated sites which is due to report shortly. As soon as this is concluded, the review team will shift to a rapid review of Protected Landscapes.
The NL Manager flagged that the OEP tend to only get involved if something is going wrong or where there has been a complaint or something along these lines. There will be an interesting 4-6 month period whilst that work is undertaken and reported on. This is clearly linked to performance against the Environmental Improvement Plan and successive Government commitments to farming, nature and other outcomes.
- ii. Succession planning: The NL Manager stated that as per the Terms of Reference, we initially invite nominations from existing Partnership membership. If that fails to yield sufficient interest the current Chair will stand again, albeit for a shorter period. This does not preclude anyone else stepping forward to express an interest in the role. Alternatively, depending on how that comes back, this influences whether we go out to the wider community and appoint an independent Chair.

6A UPDATE ON REVIEW OF THE NATIONAL LANDSCAPE MANAGEMENT PLAN

The NL Manager gave an update on progress, challenges and next steps.

6a.1 Early phase support has come from Alice Lewthwaite and Alex Scholefield.

Alice is handing on to a couple of colleagues who are helping with policy drafting and wordsmithing: Nathan Nelson, focussing on producing a consultation draft and Deborah McCann, focussing on developing impactful policies. We are also lucky to have Martin Crookston who will also be helping on final stages of wordsmithing.

6a.2 We have requested a six month extension to the 31 December 2025 deadline from Defra and are confident this timescale will work.

6a.3 Next steps:

- i. Further drafting and refinement
- ii. Approval of consultation draft by South Hams District Council moved to 29 January Exec meeting; also working with DCC and Torbay elected officer signoff and Plymouth City Council.
- iii. Public consultation due in the first quarter of 2026/27 financial year.

6a.4 Matters arising

- i. The SDNL Manager confirmed there will not be a gap because the existing Management Plan is extended beyond 31 December 2025. A statement will be added to the SDNL website for clarity.

ACTION 4 (NL Manager): Add a statement to the SDNL website confirming the current plan is extended.

- ii. Responding to the question 'to what extent can you inject something about the failure to conserve biodiversity into the Management Plan?' the National Landscape Manager explained that there has been a seismic change between the last few iterations of the Plan review and now. There is much more solid public support across the board for action for climate and nature. We also have specific requirements handed to the 'place' as opposed to the team or Partnership, in connection with the Targets and Outcomes Framework within the Environmental Improvement Plan. Five of these relate to nature and arguably two relate specifically to climate. A really important component is for Plan to direct, instruct and make an ask of Relevant Authorities and how they should respond to the asks for climate and nature.

- iii. Local Government Reorganisation: The NL Manager said that 72% of National Landscapes in England will be affected by LGR. The NLA have been working on this on our collective behalf with careful approaches to Ministers and their teams. Surrey Hills will be one of the first, so we can view that as a litmus test.

We need to have confidence in the Management Plan review process we are going through and that it defines what the area needs; provided we have it all covered in the Plan it should not really matter what type of Local Authority comes in place of what we have now; the Plan is for the National Landscape as a whole.

The Chair suggested that we inform the NLA that this has come up in our Partnership meeting.

6B PROTECTED LANDSCAPES TARGETS AND OUTCOMES FRAMEWORK: INITIAL APPORTIONMENT AND PHASING

This item provided an update on work to refine the SDNL apportionments for target 1 – restore or create wildlife rich habitat and target 8 – increase tree canopy and woodland cover.

The National Landscape Manager provided an update.

6b.1 Matters arising

- i. PLTOF: Targets continue to be refined however our emerging figures for South Devon continue to be more ambitious than the initial allocations arising from the land use consultants work for NE. Hopefully next time around, when PLTOF is updated, there will be more ambition.
- ii. For this iteration of the Management Plan, the aim is for consistency, common themes to work together and our shared outcomes.
- iii. 30 by 30: When the criteria were first published, only 20.4% of our area would count towards 30 by 30. With the more detailed work we have been doing, looking at projects and management options in context, we believe the on land component should increase to over 40%. Importantly this opens doors to farmers and landowners for any available support.
- iv. There continues to be some confusion with baseline figures for hedges – depending on the dataset used we have 4,000 kilometres (RPA), 2,000 kilometres (UKCEH) and another dataset developed by Exeter University has it somewhere in the middle. Devon hedges are very important in the SDNL hence we need accuracy.

6C DRAFT UPDATE TO THE SDNL PARTNERSHIP'S POSITION STATEMENT ON RENEWABLE ENERGY

The National Landscape Manager provided an update.

6c.1 There are strongly held views, but we need to place our Statutory Duty first when setting out the SDNL Partnership position. We have listened to a range of views to date but have not yet been able to speak with Partnership members and partners. We have looked at what Cotswolds NL has produced. Wind and solar are the most challenging at scale but there continue to be lots of opportunities at a smaller scale that would be appropriate in the landscape.

6c.2 The NL Manager is seeking Partnership members views, opinions and suggestions between now and Christmas.

6c.3 Matters arising

- i. Cllr Louise Wainwright: There is a common misconception that solar panels can be added on all roofs. 40% of the landscape in the South Hams is in a designated area and it is important to understand how energy flows through these boundaries. We have low voltage grids in our rural landscapes so if we concentrate on roofs and not on producing on the low voltage grid, we would need to call in energy from outside. I am happy to share with Partnership members why we need to sensitively look at opportunities in the low voltage grid in our designated area including community energy projects.
Chair- If you send to me, we are happy to share with Partnership.
Post meeting update: Cllr Wainwright's contribution to the debate on renewable energy projects has been received.

ACTION 5 (Chair/NL Manager): Circulate the document provided by Cllr Wainwright to Partnership.

6D CESSATION OF TORBAY COAST AND COUNTRYSIDE TRUST – IMPLICATIONS FOR THE NATIONAL LANDSCAPE

6d.1 There are wide impacts from the cessation of Torbay Coast and Countryside Trust including on SDNL projects, in particular Life on the Edge and the Berry Head area. The biggest and most significant concern is to ensure investments made to date are safeguarded including from deterioration, even in short term. The Life on the Edge project manager Rob Skinner is in conversation with Torbay councillors, liquidators and SWISCo.

6d.2 Matters arising

- i. Chair: We extend our thanks to TCCT staff and volunteers for their work on keeping those sites going.
- ii. Torbay Council are unable to do anything until liquidators have been called in.
Post meeting update: The Trust appointed liquidators are P K F Francis Clark¹.
- iii. One of the Life on the Edge hotspots is affected with ongoing LotE project activities; some activity could not go ahead as we were unable to obtain permissions for the site. LotE have offered to assist with the preparation of a Management Plan for that area and continue to work with the parties involved.

6E INVASIVE NON-NATIVE SPECIES

The SDNL Manager provided an update.

6e.1 The NL Manager highlighted some of the issues posed by invasive non-native species and also provided detail on Floating Pennywort, the issues this has caused in Stokely pond, the potential threat to Slapton Ley and the measures taken to remove immediate threat and the potential use of biological control to keep it in check going forwards.

6e.2 Matters arising

- i. Floating pennywort weevil² - The weevil has been brought in from overseas hence CABI are running this trial. A very careful approach has been adopted and this has been tried and tested on canals and river sites successfully. This has now moved on to a series of sites where ecology is at high risk. Conversations with and support from CABI Bioscience has been great. Matt Hawes from the Field Studies Council is leading on putting a proposal together. We have met the criteria for the project which is a negotiated £15,000. We have £10,000 to date - £5k from the SDNL and £5k from South West Water (invasive pot) so a further £5,000 is required to secure a slot on next years release. We ask that people raise awareness and request vigilance, particularly anyone with a pond or who regularly walks by ponds, to keep a lookout for floating pennywort.

ACTION 6 (NL Manager): Provide a press release for Jane Nicholls to circulate

- ii. Cllr Louise Wainwright: Blueprint for Rivers³, with money from the Water Restoration fund through South West Water fines, is bringing together Catchment Plans for the Gara including Slapton Ley, the Avon and the Kingsbridge-Salcombe estuary over this winter. Avon River Champions⁴ are speaking with CABI.

¹ [TCCT website – statement](#)

² [CABI \[.ORG\]](#)

³ [Blueprint for Rivers \[.ORG\]](#)

⁴ [Avon River Champions \[.ORG\]](#)

7. PARTNER UPDATES

This item provides an opportunity for Partners to update Partnership on their contributions to conserving and enhancing the natural beauty of the South Devon National Landscape and delivering on area of outstanding natural beauty Management Plan priorities.

Partners are encouraged to provide written reports prior to the meeting and are requested to keep verbal reports reasonably brief, allowing more time for other items on the agenda.

7.1. Doug Eltham, Devon County Council

- i. Local Nature Recovery Strategy is due to be submitted to Defra on 17 December.
- ii. South Hams Landscape Character Assessment is being updated.

7.2. Cllr John McKay, South Hams District Council

- i. South Hams District Council has joined UK100⁵, a network of local authorities that have particular climate and biodiversity ambitions. They are especially interested in Local Government Reorganisation and to ensure climate and biodiversity ambitions continue beyond LGR.

7.3. Tracy Brooks, Torbay Council (update on the Draft Torbay Local Plan provided by email)

- i. The Draft Torbay Local Plan 2025–2045 (Regulation 18 Version) has been published for public consultation starting Friday 28th November 2025 and closing at 11:59pm on Monday 26th January 2026. We are inviting residents, businesses, developers, landowners, statutory consultees, and community groups to “have your say” on the draft plan. The consultation is for eight weeks to allow for the Christmas period.
- ii. We will be running a drop-in events on the Local Plan in January 2026 with the following provisional dates. We will confirm on our website at: [Local Plan Update \(2025 to 2045\) - Torbay Council](#):
 - Thursday 8th January 4pm–8pm: Banking Hall, Torquay Town Hall, Castle Circus Torquay TQ1 3DR.
 - Tuesday 13th January, 10am–2pm: Paignton Library, Great Western Road, Paignton TQ4 5AG.
 - Thursday 15th January Scala Hall: Bolton Cross, Brixham TQ5 8TA.
- iii. How to Make Comments

The best way to comment on the Local Plan is via our Consultation Portal: [Torbay Council - Consultations](#). Please note that this is being hosted by Opusconsult (JDi Solutions). A link can also be found on the council’s consultations webpage at [Consultations - Torbay Council](#)). To participate:

Visit [Torbay Council - Consultations](#) or [Torbay Council - Regulation 18 Draft Local Plan 2025](#)

Register/login, review sections of interest, and submit comments on policies, site proposals etc.

Comments can be made on multiple sections; the system allows text comments.

Please include your name, contact details, any organization you represent, and structure your comments clearly. Submissions will be publicly published and shared with the Planning

⁵ [UK100\[.ORG\]](#)

Inspectorate and appointed Programme Officer. Data protection and privacy provisions are explained on the site.

- iv. There is a PDF of the Local Plan Written Statement and background information available on the Local Plan Update website at [Local Plan Update \(2025 to 2045\) - Torbay Council](#)
- v. It really does help if comments are made on the consultation platform. However, if you are unable to do so, you can email us at Future.Planning@Torbay.gov.uk

7.4. Dave Shorten, Environment Agency

- i. River Basin Management Plans are currently up for review. The new Plans will be published towards the end of 2027.
- ii. Working on programme of measures: within the River Basin Management Plan, at a water body level, the EA has been asked to produce measures for each reason the water body might be failing (RNAGS). Data currently being reviewed then going to catchment partnerships to present some data and gain their input.
- iii. Attending South Devon Catchment Partnership meeting next Wednesday.
- iv. Bathing Water results have come out: South Devon stayed same apart from one on the Dart that dropped from sufficient to bad - investigations will continue.
- v. River Bathing Waters at poor - continue investigations on understanding the catchments and where interventions can take place.
- vi. Continuing projects within the SDNL with partners such as the National Trust, Dart Harbour and Navigation Authority and WRT.

7.5. Becky Hughes, Natural England

- i. A new Strategy was published by NE a couple of weeks ago⁶. Represents a shift in direction, driving more towards nature recovery and partnership working. There is a highlighted point within the Strategy that confirms NE will continue to work with National Landscapes to define clear pathways to nature recovery. I am interested in Partnership views once they have seen it.

ACTION 7 (all): Review new NE strategy and feedback views to Becky Hughes

7.6. Richard Snow, National Trust

- i. There have been major changes at the National Trust. Over the last five months the NT has been consulting with its staff around a restructure. We are now coming to the end of that consultation period. The NT is now settling down into new structures both with people and areas that we look after. There are two core reasons for this, money savings (reduced staff) and reshaping the business to be in a better position to deliver the NT national strategy.
- ii. I have a new role: Restoration of Nature Manager. My previous role of Countryside Manager no longer exists. We used to operate as two teams, South Devon and English Riviera, now brought together as one team. This means we have lost some rangers from those two teams. New roles start January 2026.

7.7. Jane Nichols, community or voluntary groups representative

- i. Sustainable South Hams is working on a campaign called Rally for Nature. We hope this will be backed by South Hams District Council – we find out next week.

⁶ [NE Strategy \[GOV.UK\]](#) and [NE vision for nature and growth \[GOV.UK\]](#)

Post meeting update: South Hams Executive meeting, Thursday 4 December resolved to work with Sustainable South Hams CIC to develop a proposal for a "Rally for Nature" to be the subject of a report to a future meeting of the Executive for further consideration; and that authority be delegated to the Director of Strategy and Governance, in consultation with the lead Executive Member for Climate Change and Biodiversity, to utilise up to £20,000 of the Climate Change and Biodiversity Budget to support the further development of the proposal (as outlined in paragraphs 3.1 and 3.2 of the presented agenda report).

- ii. The concept is a nature orientated campaign that we hope will run over five years. The objective is to amplify and support existing nature based activities in communities. Part of the campaign includes a festival element, a celebration of place, to engage wider audiences. Keen to weave together existing significant campaigns like Dartmoor Dynamic Landscapes, Life on the Edge and Connecting People and Landscapes. In terms of measurement, we would like to discuss PLTOF with the SDNL team. We want to put 30by30 at the centre of the campaign, as people understand this message.
- iii. Support requests for Rally for Nature
 - Would like someone from the LotE project on the core team to help guide and steer this.
 - Would like meetings with Partnership representatives:
 - Leah Harris for farming engagement.
 - Peter Hinchliffe for parish councils
 - Richard Snow for the overlap with the National Trust ambitions in South Devon
 - Becky Hughes for the overlap with NE ambitions.
 From the meeting chat: Please do contact me via email becky.hughes@naturalengland.org.uk and we can have a chat
- iv. Funding: We are full of ambition but needing funds. We hopefully have seed funding from South Hams District Council which we are applying for match funding. Also going to National Lottery Heritage Fund.

7.8. Leah Harris, landowning and farming representative

- i. It is a very difficult time for farming. There are moments of enthusiasm and working together such as FiPL. Neighbours are talking and coming forward to apply for FiPL funding so word of mouth is working. We hope the scheme continues.
- ii. I will highlight one project that has received some funding that has just gone live: Mount Folly farm vending machine and mobile dairy. This is a great farm to fork story.
- iii. Roger and I will get together to look at the equestrian community and land management.
- iv. Chair:
 - At the National Landscapes Association Chairs conference held last week we had Martin Lyons, CEO of the Nature Friendly Farming Network.
 - At the presentation I had with East Portlemouth, Emma Reece (NT) mentioned about engaging with the horse riding community, so it is worth getting in touch with Emma.
- v. Cllr John McKay: It is also worth contacting the Food and Agriculture Officer Rebecca McKee at SHDC.

7.9. Peter Hinchliffe, parish and town councils representative

- i. Newton and Noss:
 - Revising the Neighbourhood Plan. Held an open event last weekend; consultation ends January.
 - There is a focus group in the village that will apply for bathing water status on the Yealm (apply to Defra).
 - Work is now underway on remediation work - digging out sediment contaminated with high levels TBT. We wait with interest to see if this causes more problems...
- ii. A number of councils have asked me about attending these meetings – I have directed them to YouTube.

8. NATIONAL AND REGIONAL MATTERS

As the meeting was overrunning, the Chair suggested that items 8a to 8c on the agenda are sent out in a roundup email post meeting.

ACTION 8 (NL Manager): Send out updates on items:

- 8a) National Landscapes Association vision of thriving landscapes in 2050.
- 8b) Nature South West
- 8c) Your Natural Partner
- Send conference slides

Post meeting update: Slides circulated to Partnership post meeting, on 28 November, along with the Torbay Council update, provided by Tracy Brooks.

9. FUTURE MEETINGS

Meetings in 2026:

- 13 March at 10am
- 17 July at 10am
- 27 November at 10am

MEETING CLOSED

ITEM 6 South Devon National Landscape Partnership Matters

6A. Partnership Chair's Report

ITEM FOR	INFORMATION, FEEDBACK & ACTION	REPORT BY	Peter Sandover, South Devon NL Partnership Chair
SUMMARY	This report provides a summary of activity over the last few months undertaken on behalf of the National Landscape Partnership by the Chair, Peter Sandover		
MANAGEMENT PLAN THEMES	<p>All PARTNERSHIP: Awareness & communication; Management, organisation & partnerships.</p> <p>Others – underpins and links to all other Management Plan themes.</p>		
RECOMMENDATION	<p>Partnership members are recommended to:</p> <ol style="list-style-type: none"> i. Note the report and are encouraged to provide brief reports where possible in advance of scheduled meetings to assist with Item 6 Partner updates. 		

SLAPTON LINE

1. I am sure we are all horrified by the damage and catastrophic impact on those in Torcross, Slapton and Beesands caused by storms Goretta, Ingrid and Chandra in January and February this year.
2. The staff members are actively participating in the process of review, restoration and adaption through our membership of the Slapton Line Partnership (SLP) with Devon County Council, South Hams District Council, the affected Parish Councils, Environment Agency, Natural England, Field Studies Council and the Wild Planet Trust.
3. The SLP was set up in 2001 to 'promote a coordinated policy for managing coastal change in the area'. This Partnership meeting will provide an update to members.
4. A review of the latest strategy and adaption plan (2023) might be useful background and context⁷.

MANAGEMENT PLAN REVIEW

5. Over the last months, considerable work has been done preparing the consultation draft of our new Management Plan. Many thanks to the team of Alice Lewthwaite, Alex Boulton, Deborah McCann and Nathan Nelson, the latter two bringing the document together with clearer and more robust objectives and policies.
6. This document will be out for consultation for 8 weeks from 2nd April to 27th May 2026. The Plan thus far has benefited from inputs from Partners, Parishes and other relevant authorities. However, at this stage I would encourage all Partners to take time to review the draft and provide their feedback, preferably online. It is a challenging time for all Protected Landscapes, and it is my opinion to be effective the Partnership must have a shared view on our objectives and vision that we can articulate to all.

⁷ [Resources \[slaptonline.org\]](https://www.slaptonline.org)

SDNL NEWSLETTER

7. I hope members of the Partnership have received our Spring 2026 newsletter, many thanks to our Communications Officer Diane Lethbridge for putting this together. If you have not received this, please let Diane know. This update gives you an understanding of the volume of work covered by the staff and LotE teams.
8. Please promote the many events scheduled over the coming months with your partners.
9. The update also welcomes the extension of the FiPL programme until March 2029.

PLANNING MATTERS

10. Following my visits to Parish Councils I have received a number of requests to provide advice on planning matters impacting the SDNL, some relate to Planning Applications which if falling within our Planning Protocol are reviewed by our Planning advisor others that are more challenging relate to enforcement issues and permitted development.

Item Ends.

ITEM 7. National Landscape Management

7A. Farming in Protected Landscapes Programme

ITEM FOR	INFORMATION & FEEDBACK	REPORT BY	Alice Wyness, SDNL Farming in Protected Landscapes Officer
SUMMARY	This report summarises the Farming in Protected Landscapes Programme as so far implemented in South Devon National Landscape. It reports on programme extension of three years, ambitions going forward and programme achievements so far.		
MANAGEMENT PLAN THEMES	<p>ALL PLACE: Natural resources & climate; Biodiversity & geodiversity; Farming and land management; Historic Environment & Local Distinctiveness; Coast & marine; Rivers & estuaries; Landscape Character.</p> <p>All PEOPLE: Tourism, access & recreation; Planning & sustainable development; Transport & highways; Rural economy & services; Community & culture.</p> <p>All PARTNERSHIP: Awareness & communication; Management, organisation & partnerships.</p>		
RECOMMENDATION	<p>Partnership Committee members are invited to:</p> <ol style="list-style-type: none"> i. Note the scope of the opportunity for the South Devon National Landscape, its farmers and land managers; ii. Advocate for the programme in discussions with the area's farmers and landowners to drive high quality, innovative and well-developed proposals 		

BACKGROUND

1. The Farming in Protected Landscapes (FiPL) programme was created by Defra and forms part of the Government's Agricultural Transition Plan. The programme provides funds to allow farmers and land managers to work with National Landscape teams and National Park Authorities in order act on management plan priorities. The programme was initially set to run over three financial years from mid-2021 to the 31st of March 2024. However, two, one-year extensions were previously announced, continuing the programme on until 31st March 2026.
2. Defra recently announced a further 3 year extension to the programme. Support and funding will now be available up to March 31st 2029.
3. The programme will continue to fund projects that:
 - Support **nature** recovery;
 - Mitigate the impacts of **climate** change;
 - Provide opportunities for **people** to discover, enjoy and understand the landscape and its cultural heritage;
 - Protect or improve the quality and character of the landscape or **place**.

Further information on the programme and supported projects can be found on the South Devon National Landscape website⁸

⁸ [Farming in Protected Landscapes \[southdevon-nl.org.uk\]](https://southdevon-nl.org.uk)

4. The previous in-year operating budget was just over £400,000 and this is set to stay at this amount over the coming 3 years.

LOCAL ASSESSMENT PANEL

5. The FiPL Local Assessment Panel (LAP) has been a valued and integral part of programme and will remain with the same membership continuing into year 6. The varying knowledge through LAP members is imperative in producing high quality projects. Members are:
 - John Yeoman - Chair / Farmer
 - Jo Rogers – Mixed Farmer
 - Leah Harris – Vegetable Farmer, equestrian business owner and SDNL Partnership Committee Farming & Landowning Community Representative
 - Vicci Camp – Mixed Farmer
 - Matt Darke – Dairy Farmer
 - David Camp – Farmer, butcher and farm shop owner
 - Richard Foss - Mixed Farmer
 - Johnny Haines - Plympton NFU Chairman / Farmer
 - Bernard Taylor – SHDC Councillor with farming sector and Development Management Committee experience
 - Louise Riley - Natural England
 - Gary Rumbold – Environmental consultant and ecologist
 - David Shorten – South Devon Catchments Coordinator, Environment Agency
 - Environmental Non-Governmental Organisations (ENGOS) representative – has been RSPB in the past, vacant currently
 - Roger English - SDNL Manager

YEAR 5 PROJECTS

5. In total there have been 375 FiPL enquiries from landowners to date. 139 have been taken forward to projects.
6. 29 projects funded this year, with a broad spectrum of positive outcomes for the National Landscape and beyond. The main themes that have emerged from this year's projects really reflect the movements which are happening within the landscape and beyond. Themes that have emerged are:

Improving accessibility to local produce

7. We have had multiple projects with a focus on improving accessibility to local produce while creating a more sustainable farm business. These projects included vending machines for farms to sell their meat and eggs, a micro-butchery and facilities to incorporate apples from small scale orchards into wholesale cider making.

Rural Education

8. We have also continued to have many projects which encourage education on local food systems and rural skills. These varied from a cooking school to wool dying and crafting. Many of the projects also included interpretation boards or volunteer days to allow people to learn and engage with their rural surroundings.

Tree planting

9. There has also been multiple hedge and tree planting projects. Through these projects, carbon will be sequestered, new habitat created and the small field systems character of our landscape maintained.

Improving water quality

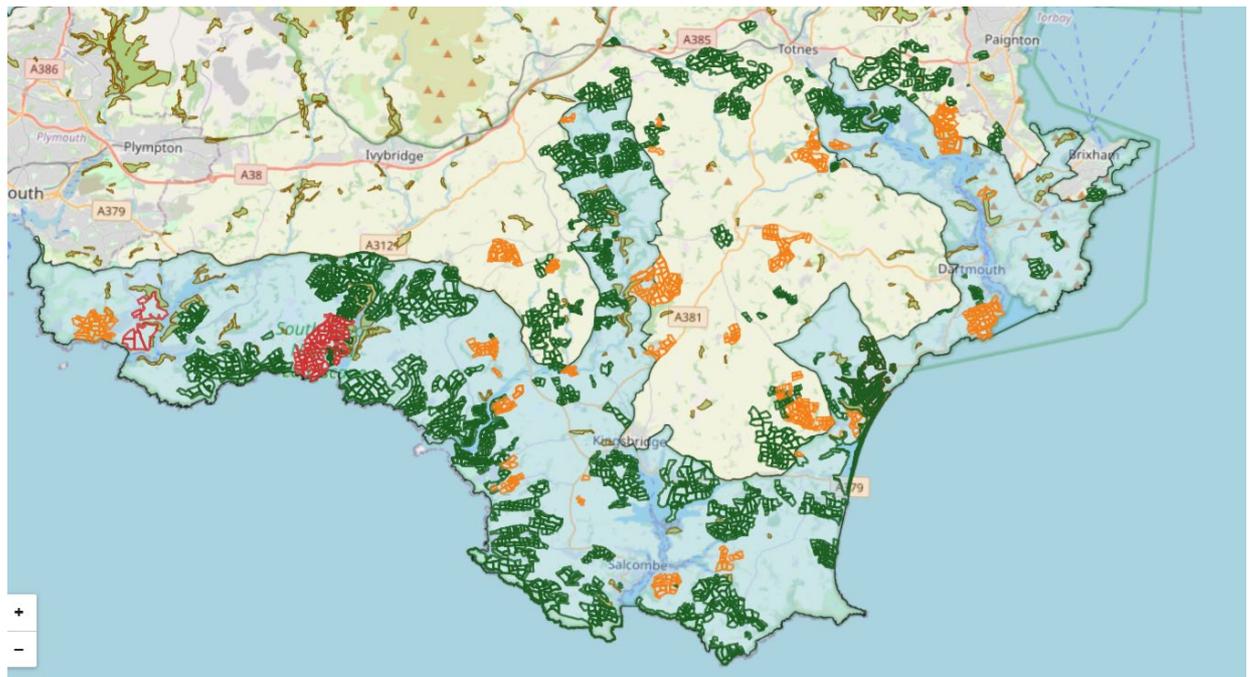
10. Water quality has been a topic that high on the agenda for many years and this year was no exception. One project funded the Wild About the Erme (WATER) cluster group to identify possible on-farm interventions to improve water quality in the Erme catchment. An advisor produced bespoke reports for farmers to identifying these on farm opportunities to improve water quality and where funding could be obtained to implement these interventions. WATER is hoping to use this FiPL funded project to be a jumping off point to gain more funding in the future. Another project was the funding of a 'Tow and Fert' machine, which allows foliar application of fertilisers. This could cut nitrogen usage by almost half but also allow the application of organic fertilisers and bio stimulants to improve soil health. As part of the funding, we will be holding a demo event to encourage peer to peer learning between farmers and also through soil health experts.

Improving grassland management

11. Many Farmers are looking to FiPL to help them improve their grassland management, both for optimising grass growth and for species diversity. We have funded on farm rotational grazing equipment and troughs in a few projects, which will allow farmers to paddock graze rather than set stocking. This management can also help reduce the need for wormers, reduce poaching and generally improve soil health. We also funded a course on sustainable grazing at the Apricot Centre, which was well attended by farmers with the National Landscape.

PRIORITIES FOR YEARS 6 TO 9

12. In 2026 SDNL will have a new management plan, setting out new and continued priorities for the National Landscape.
13. With FiPL projects being directly scored against this management plan, this will influence the projects that we are encouraging and being approved. One of the main priorities coming from the new management plan will be engaging with land managers who the National landscape has not yet interacted with. These are often 'hard to reach' individuals who require more encouragement and assistance to put applications forward. We are doing work towards creating a 'heat map' which will show up areas where our efforts should be focused. The first step towards this was mapping land holdings which have already engaged with the FiPL programme. The map below shows holdings which have carried out successful projects in green, holdings that have engaged but have not taken a project to completion (application may have been declined or withdrawn) in orange and holdings who have made contact but not submitted an application or had contact themselves (initial contact may have been through an agent). This map helps to show where we have gaps in our land manager relationships across the National Landscape.



14. The holding map can be combined with the mapping created as part of work for the management plan. This shows many land classifications such as protected sites (SSSIs, Priority habitat), other existing habitats as well as lower grade agricultural land. This, overlaid with our land holdings map will show areas which have potential for habitat creation and whether we already have existing contacts for these sites. This mapping should help us focus our efforts in directing FiPL funding to areas on the National Landscape where we can achieve the greatest outcomes for maintain and creating wildlife rich habitats.

Item Ends.

7B. Life on the Edge Project

ITEM FOR	INFORMATION & DISCUSSION	REPORT BY	Rob Skinner, Life on the Edge Project Manager
SUMMARY	<p>This report provides an overview of progress, from the start of Life on the Edge (LotE) Delivery Phase (April 2024) to date.</p> <p>Highlighting the processed, successes, and challenges as we approach the mid-term of this 5-year project.</p> <p>A presentation will accompany these notes.</p>		
MANAGEMENT PLAN THEMES	<p>ALL PLACE: Natural resources & climate; Biodiversity & geodiversity; Farming and land management; Historic Environment & Local Distinctiveness; Coast & marine; Rivers & estuaries; Landscape Character.</p> <p>All PEOPLE: Tourism, access & recreation; Planning & sustainable development; Transport & highways; Rural economy & services; Community & culture.</p> <p>All PARTNERSHIP: Awareness & communication; Management, organisation & partnerships.</p>		
RECOMMENDATION	<p>Partnership members are recommended:</p> <ol style="list-style-type: none"> i. Partnership Committee members advocate, support and promote LotE as a flagship project of the South Devon National Landscape, to their communities and partners. ii. South Devon National Landscape Core Funding Group continues to provide financial oversight of LotE budgets, reported to by the LotE Project Manager; 		

BACKGROUND

1. The South Devon Coast is home to the one of the greatest concentrations of threatened invertebrate and plant species in the country. Many of them confined to a narrow and ever-shrinking coastal strip by human derived pressures on one side and the sea on the other. Life on the Edge is working with farmers, landowners, and local communities to restore and conserve habitat for these threatened species on the edge, connecting communities with nature on their doorstep, whilst also improving their health and wellbeing through a diverse range of project activities.
2. This £4.5M, 5-year (Apr 2024 – Mar 2029), project is being delivered by the South Devon National Landscape (SDNL) team, with partners Buglife, National Trust, South West Coast Path Association and Doorstep Arts, as well as many local groups and organisations. It is supported by a £2.24M Heritage Fund grant in addition to other grants and match funding.

PROJECT STRUCTURE

3. The first six months of the project was centred around recruiting the core project team, consisting of Project Manager, Communities Officer, Conservation Officer, Finance and Admin Officer (0.6FTE), and a Volunteering and learning Officer (0.4FTE). A Communications Intern (0.5FTE), employed through Exeter University joined the team in late September, closely followed by three Apprentices in October 2024.
4. Four trainees (2x Conservation Trainee (0.5FTE) and 2x Communities Trainee (0.5FTE) in two cohorts have since been employed, with summer (April 2025) and winter (Oct 2025) recruitment.

5. The project staffing structure has some dependencies of working in close partnership; The LotE Conservation Officer is employed by Buglife, and our Apprentices hosted by the National Trust and Field Studies Council (FSC).

PROJECT TARGETS

6. 18,000 people will increase their understanding of project special species, and its expected that 50% of those will take targeted action as a result of being involved in project activities.
7. Of those 18,000, at least 3,000 will have previously had limited engagement with the coast – Lote will have helped overcome barriers, creating rewarding and life enhancing experiences.
8. 75% of participants of targeted audiences will report an improvement in their health and wellbeing because of being involved in project activities.
9. At least 33,000 beneficiary days will be delivered through the 5 years of the project.
10. LotE will provide opportunities for 9 Apprentices, 5 Communications Assistants and 10 trainees to gain new skills and access to entry level employment.
11. Dozens of landowners & communities will gain new skills in securing natures recovery.
12. The LotE 60 target species will have progressed on along their journey to recovery by 2029.
13. 900,000 South West Coastpath visitors will benefit from a more nature rich environment as they pass through the Project area.
14. 575ha of invertebrate friendly habitat will be restored or created.
15. 100ha of species rich grassland donor fields will be created.
16. Over 1,300ha will be classed as nature friendly farmland along the South Devon B-Line, connecting important project hotspots.

PROJECT AUDIENCES

17. LotE Audiences can be segmented into 4 key areas:
 - 2 target audiences of 'Older, isolated people' & 'Younger people disconnected from nature'
 - General audiences - people and communities that are already accessing the coast who don't have much understanding of the special South Devon wildlife and their pressures.
 - Farmers and landowners
18. The 'Learning with Lote' workstream embeds knowledge, building opportunities right across the project. From more informal learning at events, volunteering tasks and activities, to more structured learning opportunities with schools, volunteer training, skill sharing and community workshops.

PROJECT SUCCESSES OVER FIRST TWO YEARS

19. Built on firm foundations during Development Phase, there has been incredible interest from groups and individuals keen to get involved with the project. Activities have only gone from strength to strength during the first two years of Delivery Phase with a real

groundswell gathering and the Life on the Edge project becoming well known locally and in some cases at nationally.

20. Over the past two years LotE has directly engaged with nearly **7,000** people in project activities. These have widely ranged from specialist multi-week curated programmes for targeted audiences, right through to specialist species survey training workshops and practical conservation works.
21. Since launch in April 2024, the project has surpassed aims to reach a wide range of audiences. During the first year the targeted audience work has been primarily focused in Torbay, due to identified need within communities. Alongside this LotE has also engaged with general audiences across the whole project area. This has provided a great range of opportunities for a broad range of groups, communities and individuals to get involved with the project.
22. Project evaluation has identified that nature focused LotE activities, which have provided access to the environment are creating significant health and wellbeing benefits to participants.
23. A particular highlight in the arts program was the creative 'Robberfly' performance - A collaboration with the National Landscapes Association 'Nature Calling' project and LotE cultural partner, Doorstep Arts. Through the artistic flair of NDP Circus the lifecycle of a very rare insect was brought to life in the urban surroundings of Plymouth and Paignton and within its more typical habitat, at the last known location at Prawle Point. To capture the event, a short video was commissioned watch it here⁹.
24. Project staff have experienced an overwhelming reception to job opportunities, constantly smashing South Hams applications records, topping out with 114 applications for one Conservation Trainee role. The project has so far secured 14 new recruits: 6 Apprentices, 6 Trainees, and 2 Communications Assistants through numerous rounds of recruitment. The vast interest in roles confirms the need for entry level jobs in the environmental sector.
25. LotE is gaining significant momentum in the agricultural sector. The successes are mainly due to the LotE Conservation Officer being able to offer bespoke agri-scheme advice. This has resulted in co-creating several schemes unlocking c£35k of funding for nature friendly farming. Progress in this area has unfortunately been hampered by the Government's pause on the lowest and most accessible tier of agri-environment scheme funding, Sustainable Farming Incentive. However, as this has now reopened (Feb 2026) the project team are hoping to build on farming relationships built over the past two years and maximise on available opportunities.
26. Further to agri-schemes, LotE has maximised the use of other DEFRA funding. Utilising c£40k of '30 by 30'¹⁰ funds we have been able to create species rich grassland and facilitate infrastructure to allow long term management of important coastal areas. In addition, Farming in Protected Landscapes (FiPL) funds have also been used to enhance project areas with invertebrate benefitting features.

⁹ [Robberfly film \[YouTube\]](#)

¹⁰ [30by30 \[GOV UK\]](#)

27. Outside of Agri-schemes LotE has directly influenced the creation of **26ha** of new species rich meadow from seed. In future years these areas can be used as seed donor field sites to create more species rich meadows.
28. Working in close collaboration with land managers LotE has restored **115ha** of invertebrate friendly habitats with tweaks in management or land changes (such as scrub cutting).
29. Communities have been very keen to get involved and facilitate their own nature conservation and environmental projects. To date the project has assisted in the creation and approved 11 'LotE Small Grants' across project area, totalling £19k of support.
30. Community action has been crystalised into community lead 'Pollinator Plans' (PP). To date LotE has co-created 3 plans with another 3 in development. Most significantly the Holbeton PP has created a template for community action, embedding 10 action items. Through the process of costing interventions or activities, it allows a straight forward structure for LotE Small grants funding or other funding, making plans into action.
31. Volunteers have kindly contributed 880 Volunteer hours to the Delivery Phase of the project so far which have a combined value of £45k of 'in-kind time'.
32. Project partners have contributed 4,300 hours to the project to a combined value of £184k of 'in-kind time'. Although both contribution figures are good, its felt that the true value of in-kind time is unrecorded.
33. As more effort in is aimed at specialist species specific surveying, the more that is understood of the project target species distribution and abundance. Most recently project volunteer surveyors have discovered a new population of Mediterranean oil beetles on either side of the Dart.

FOCUS FOR THE NEXT 3 YEARS

34. As LotE goes forward into the latter half of the Delivery Phase, the project team are encouraged and excited with progression in the first two years. As LotE gains true groundswell, the project is guided by its backbone of targets and strategic objectives, but it also able to respond to new opportunities and challenges, fuelled by evaluation and review of project activities.
35. LotE will use learning from Torbay and extend focus into more rural areas of the South Hams with targeted audience work, whilst having an emphasis on outcomes for general audience activities.
36. Continue to develop shovel ready' plans and be ready to maximise on future external funding opportunities.
37. Continue to deliver great nature and environment focused activities for a range of audiences which will hugely benefit both people and wildlife of South Devon.

LEGACY FIRST APPROACH

38. A legacy first approach has been fundamental to devising LotE project activity. Ensuring that LotE's Impact will be felt way beyond the end of the project. This approach has been baked into activities from an early stage in Delivery Phase. Using this 'Legacy First' approach ensures activities will continue through the groups and

individuals who are engaged with the project, either through securing external funding or empowering them with the skills needed to last into the future way past the March 2029 project end date.

Item Ends.

ITEM 8 Partner Updates

Ed Parr Ferris, Environmental Organisations (NGOs) representative

1. I wanted to let you know that after 11.5 years at DWT I will be leaving on 13th February, having accepted a role at Forestry England as Species Recovery Manager.
2. As that will be a full time national role, I will also have to relinquish my role on the South Devon National Landscape Partnership Committee after (I think) about 15 years. While sad to step out of the discussions of what is going on locally, perhaps it's time for others to bring their energy to the partnership. I know DWT will still want to join occasionally, although I'm not yet sure how my role will be replaced. I recognize I have not been able to take as much of a role as I would have liked on the LotE project, but I will now step out formally. Likewise on the Wembury MNR project. I will of course keep a close eye on how things develop going forward.
3. Please do pass on my best regards to all on the SDNL committee. It has been a real privilege to be involved for so long and seen so many projects developed and delivered by the NL unit and its many partners. The team delivers so much with so little resource, it is always impressive how much commitment to nature recovery the team has and what they then inspire others to do. I have enjoyed being part of the partnership committee and look forward to seeing what the next 15 years brings!
4. While I am moving role, I will still be living at Ash near Dartmouth. In my new role I will also continue my involvement with the pine martens, beavers and wildcats in Devon. Personally I will also keep on managing the little heath project around the ridges locally to me – still an ambition to develop a large scale restoration project!
5. It has been a pleasure working with you all and I'm sure I will end up working locally again at some point. See you around – always up for a pint!

Take care and all the very best for the future.

Jane Nichols, Community/voluntary groups representative Rally for Nature Phase 1

1. **Rally for Nature** is an ambitious five year, region-wide campaign coordinated by Sustainable South Hams (SusSH), bringing people together to restore nature where we live. It builds on — rather than replaces — the substantial work already happening across South Devon's communities.
2. The campaign operates at three levels:
 - **District** – a coordinated programme aligning priorities for nature recovery, guided by strategic partners and an advisory group.
 - **Parish** – place-based engagement and capacity building for local climate and nature action.
 - **Citizen** – practical opportunities for people to connect with nature and participate in hands-on stewardship
3. The aim is to deepen connection to the natural world on people's doorsteps and turn that connection into visible, collective action.
4. The approach is to **start small and grow**, increasing successive "waves" of activity:

- **By geography** – expanding parish by parish across the district.
 - **By subject** – widening themes (rivers, soils, wildlife corridors, food, access, learning).
 - **As budget and energy allow** – scaling responsibly as funding and capacity increase.
5. South Hams District Council has approved £20,000 to develop Phase 1 (to July 2026), including team recruitment, governance, branding, web platform, funding bids and practical guides.
 6. The public launch is planned for **5 June** at the **Rivers and Moorland Festival** (Ivybridge) in collaboration with Dartmoor National Park Authority — providing a high-profile, partnership-led platform to move from concept to active community engagement.
 7. Interested community groups, councils and possible partners are encouraged to register interest¹¹ and to join our mailing list¹² in order to keep up to date with this fast moving project.

Item Ends.

¹¹ [Rally for Nature – register interest \[Google form\]](#)

¹² [Join SusSH mailing list \[Mailchimp\]](#)

ITEM 9. National & Regional matters

9A. Environmental Improvement Plan

ITEM FOR	INFORMATION & FEEDBACK	REPORT BY	Roger English, National Landscape Manager
SUMMARY	This report very briefly introduces and signposts the updated Environmental Improvement Plan 2025 and the subsequent Office for Environmental Protection Assessment of progress to improve the natural environment in England .		
MANAGEMENT PLAN THEMES	<p>All PLACE: Natural resources & climate; Biodiversity & geodiversity; Farming and land management; Historic Environment & Local Distinctiveness; Coast & marine; Rivers & estuaries; Landscape Character.</p> <p>All PEOPLE: Tourism, access & recreation; Planning & sustainable development; Transport & highways; Rural economy & services; Community & culture.</p> <p>All PARTNERSHIP: Awareness & communication; Management, organisation & partnerships.</p>		
RECOMMENDATION	<p>Partnership members are recommended to:</p> <ol style="list-style-type: none"> i. Note the scope, scale and urgency of the challenge to deliver on commitments and actions to ensure the EIP25 targets are met. ii. Consider the relationships with priorities for action cross South Devon and the advocacy role members of the Partnership can play in catalysing action 		

Background

1. The government concluded a rapid review of the previous Environmental Improvement Plan (EIP23) on 30 January 2025 and published a statement of the key findings. An updated Environmental Improvement Plan 2025 was subsequently published on 1 December 2025 [Environmental Improvement Plan \(EIP\) 2025 - GOV.UK](#)
2. The EIP is a strategic framework for improving England’s natural environment up to 2043. updated EIP sets new interim targets for the statutory Environment Act 2021 targets. For National Landscapes, National Parks and National Trails, these new interim targets must be considered alongside the Protected Landscapes Targets and Outcomes Framework and inform the emerging national landscape management plan for South Deovn, its related delivery programmes and asks of our relevant authorities.

Progress in improving the natural environment in England 2024/2025

3. The Office for Environmental Protection published its fourth statutory report¹³ on government’s progress in delivering its Environmental Improvement Plan (EIP). The assessment of progress covers the annual reporting period of April 2024 to March 2025.
4. The headline of this assessment and report was:
While EIP 2025 represents an improvement on EIP23 including greater clarity, transparency and detail “Government remains off track to meet its environmental

¹³ [Progress: improving natural environment in England \[theoep.org.uk\]](#)

commitments and its actions now will determine whether or not key targets for biodiversity and the protection of land and sea by 2030 will be met”

Item Ends.

9B. Consultation on draft revised National Planning Policy Framework

ITEM FOR	INFORMATION, CONSIDERATION & FEEDBACK	REPORT BY	Roger English - South Devon National Landscape Manager
SUMMARY	This item introduces the recent National Planning Policy Framework consultation, key protected landscapes matters, and the response made by the National Landscapes Association with extensive input from the national Planning and Placemaking Working Group.		
MANAGEMENT PLAN THEMES	<p>ALL PLACE: Natural resources & climate; Biodiversity & geodiversity; Farming and land management; Historic Environment & Local Distinctiveness; Coast & marine; Rivers & estuaries; Landscape Character.</p> <p>All PEOPLE: Tourism, access & recreation; Planning & sustainable development; Transport & highways; Rural economy & services; Community & culture.</p> <p>All PARTNERSHIP: Awareness & communication; Management, organisation & partnerships.</p>		
RECOMMENDATION	Partnership members are recommended to: <ul style="list-style-type: none"> i. Consider the proposed new text, consultation questions, likely implications for protected landscape management; ii. Note the response submitted by the National Landscapes Association and use its content and key messages in conversations advocating for the South Devon National Landscape 		

Background

1. On 16 December 2025, the Government published its consultation on proposed reforms to the National Planning Policy Framework (NPPF). The consultation ended on 10 March 2026 and the government's Ministry of Housing, Communities and Local Government is analysing the responses.
2. The consultation web page can be found here¹⁴
3. The consultation documents included:
 - the Government's commentary on the proposed reforms;
 - the text of the draft NPPF; and
 - questions on proposed reforms to the NPPF.
4. The consultation posed 225 questions. However, our work and that of the National Landscapes Association focussed on only a handful of those questions, considered to be particularly relevant and / or significant, in the context of National Landscapes.
5. The proposed new and updated NPPF is widely described as the most substantial re-write of planning policy in decades.

Relevance to South Devon and other National Landscapes

6. The NPPF is one of the most important reference points for the planning system in England, including in plan-making (e.g. local plans and neighbourhood plans) and in development management decision-making (e.g. for decisions relating to planning applications and planning appeals). As such, the extent to which the planning system

¹⁴ [NPPF proposed reforms \[GOV.UK\]](#)

helps, or fails, to conserve and enhance the natural beauty of National Landscapes is heavily dependent on the policies that are set out in the NPPF.

National Landscapes Association response - key messages

7. National Landscapes are outstanding, iconic landscapes whose distinctive character and natural beauty are so precious that they are safeguarded in the national interest. They are of immense value to the nation, offering a wide range of public goods and services. For over 20 years, current national planning policy has helped balance the protection of such landscapes along with supporting the delivery of appropriate new housing in National Landscapes to support vibrant and thriving rural communities, which is compatible with, and does not compromise, the character and natural beauty of the National Landscape.
 - A. We want to welcome the change from 'landscape and scenic beauty' (current NPPF para 189) to 'natural beauty' N4 (1) in the proposed draft, as this aligns better with the underpinning legislation for National Landscapes.
 - B. We do have concerns that some of the wording changes in the draft NPPF will inadvertently reduce protections and lead to the degradation of nationally designated protected landscapes.
 - C. We want to retain the phrase "the highest status of protection" (para 189) in proposed policy N4 (1): Protected Landscapes. This is a crucial and long-standing tenet of the protection, merit and scrutiny afforded to these places by LPAs, developers and others; removing it would convey the message that such scrutiny or merit is no longer warranted.
 - D. There needs to be a better way for decision-takers to differentiate between the many 'substantial weights' now proposed in the draft – the current parity of weights looks neat but fails to recognise the statutory, nationally designated status of National Landscapes and National Parks, which has a greater weight than other considerations without a statutory basis. We recommend that the 'substantial weight' of the draft should therefore be reverted to the current 'great weight' of the para 189.
 - E. The current NPPF has explicit presumption of refusal of major development in National Landscapes and National Parks (i.e. 'should be refused' in para 190). This changes to a 'caveated approval' (i.e. 'should only be supported...') in the current draft's N4 (2); this would weaken in-practice protection of these landscapes, which should not be the direction of travel for a new NPPF.
 - F. The proposed new decision-making policies S3, S4 and S5 no longer recognise existing policies that protect areas or assets of particular importance. The omission of the current 'qualification' in NPPF para 11 (d) (i) ("unless: i. the application of policies in this Framework that protect areas or assets of particular importance ... provides a strong reason for refusing the development proposed") means there is no longer a presumption in favour of sustainable development in the context of protected

landscapes, and no clear distinction made between statutorily designated and undesignated landscapes. This would significantly reduce the ability to effectively apply policy N4 in protected landscapes, threatening internal consistency of the NPPF.

- G. We suggest that Spatial Development Strategies (PM1) offer the opportunity to create genuinely holistic spatial strategies for delivering affordable homes, healthy and green neighbourhoods, space for nature, sustainable living and vibrant communities, sufficient provisioning and accessible routes and ways. Considering protected landscapes at a genuinely strategic scale should be a critical component of such strategies. We are therefore concerned that the new policy PM1 does not mention or require the new SDSs to consider National Landscapes, National Parks or National Trails as critical national infrastructure or as key components of such Spatial Development Strategies.
- H. It is critical that a consistent position is taken to major development in protected landscapes at both plan-making and decision-making stages. We consider that both PM1 SDS and PM2 Local Plans need to include presumption against major development in protected landscapes (as set out in N4), in order to ensure consistency across the NPPF. PM1 needs to explain how apportionment of 'objectively assessed needs for housing' (OAN) to local planning authorities (LPAs) reconciles with S1 (1.a.i), which importantly allows LPAs to plan for less than the OAN in certain circumstances, including in protected landscapes.
- I. The emphasis in the current NPPF requires strategic policies and plans to address economic, social and environmental priorities together, as well as to conserve and enhance landscapes and address climate change (current paras 11, 15, 20). These are not carried forward into the current draft. We are concerned that this discontinuity would have the effect of deprioritising the environment in plan-making, thus upsetting the balance of sustainable development; we therefore recommend that these requirements are carried forward by adding them into PM2 Local Plans or S2 Producing a Spatial Strategy.
- J. The phrase "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services" currently in para 187 (b) of the NPPF is an important perspective and long-standing tenet of rural planning policy that underpins the more specific protections of protected landscapes. We are concerned about the loss of this phrase in proposed N1. Without recognition in N1 that the countryside does have intrinsic character and beauty that is worth protecting, all subsequent policies and intentions are weakened.

The full response developed by the National Landscapes Association can be found as Appendix 1 to this item

Item Ends.

Appendix 1 to item 9B**NPPF consultation 2026 - Proposed wording for NLA response to MHCLG consultation***2: Plan-making policies – The Plan-making framework****PM1 Spatial Development Strategies***

Question 6 Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly disagree

a) Please provide your reasons, particularly if you disagree.

The National Landscapes Association are very concerned that PM1 currently contains no explicit requirement for the new Spatial Development Strategies (SDS) to address landscape issues.

National Landscapes are outstanding, iconic landscapes whose distinctive character and natural beauty are so precious that they are safeguarded in the national interest. They are of immense value to the nation, offering a wide range of public goods and services. Nationally designated National Landscapes will often be at an SDS level, and are a strategic plan-making matter, critical to setting the context for, and informing, subsequent Local Plans. SDSs offer the opportunity to create a genuinely holistic spatial strategy for delivering affordable homes, healthy and green neighbourhoods, sustainable living and vibrant communities, and considering impacts on landscapes (including protected landscapes) at a strategic scale is a critical component of such strategies.

We consider that the wording of PM1 (1) should be amended to read *“Spatial development strategies should set a positive vision for future growth and change at a sub-regional scale and provide a clear spatial framework for investment and growth including for new housing, along with **addressing other economic, social and environmental priorities**”* (bold text = additions; text from current NPPF para 15 which would also sit appropriately here).

We also advise that, to ensure adequate consideration of National Landscapes at the strategic plan-making level, (with regard to section 85 of the CRoW Act), the wording of PM1 (2) should be expanded with an addition sub-point to set out *“**making sufficient provision for the conservation and enhancement of the natural, built, and historic environment, including protected landscapes and green infrastructure.**”* (bold text = additions, which includes text from current NPPF para 20).

To the same end, and for clarity, we consider PM1 (2) (b) needs to include specific reference to the presumption against major development in protected landscapes, (as set out in decision-making policy N4 (2)). Suggested additional wording: ***“When considering potential allocations within Protected Landscapes, the requirements of Policy N4 (Protected Landscapes) relating to major development should be applied.”***

A further concern is that while the SDS approach offers potential for a larger area in which housing provision can be considered, there is currently no reference in PM1 (2) (a) as to how such ‘apportionment to local planning authorities in the strategy area of objectively assessed needs for housing’ also would reflect to S1 (1) (a) (i). That policy importantly allows LPAs to plan for less than the objectively assessed need (OAN) in certain circumstances, i.e. where the application of the policies in this Framework that protect assets such as protected landscapes provides a strong reason for restricting the overall scale, type or distribution of development in the plan area.

We are genuinely concerned that this disconnect between PM1 and S1 in this respect would render the application of S1 highly difficult, if pre-empted by an SDS which pre-set the housing requirement of an LPA. We therefore consider it essential that PM1 (2) (a) also includes reference to taking account of S1 (1) (a) in such apportionment.

We would also take this opportunity to highlight a broader concern with OAN and protected landscapes – the December 2024 change to the standard method for calculating OAN has resulted in significant increase in housing need figure for most LPAs who have substantial areas within National Landscapes. For LPAs without an up-to-date local plan, this increase in OAN has resulted in a significant decrease in the LPA 5-year housing land supply figures, increasing the pressure for LPAs to seek to accommodate a much larger amount of housing in their emerging local plans, (despite the provisions of current NPPF para 11 (b) (i), new proposed S1 (1)) and increasing the pressure for LPAs to grant approval for inappropriate development within National Landscapes and their settings. Whilst we would welcome changes to the standard method to reflect the presence and importance of protected landscapes in plan-making areas, in the meantime it is critical that PM1 gives confidence to plan-makers of SDSs and Local Plans that it is not their OAN that they will be expected to accommodate, but rather their housing requirement, devised with regard to SP1, H02 (1) and H02 (3) (a).

PM2: Local Plans

Question 9 Do you agree with the role, purpose and content of local plans set out in policy PM2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly disagree

a) Please provide your reasons, particularly if you disagree.

The National Landscapes Association are very concerned that several requirements of the current NPPF for plan-making regarding the environment and landscapes (current paras 11, 15 and 20) have not been carried forward into PM2 or S2.

Currently para 20 (d) of the current NPPF requires the overall strategy in plan-making to ‘*make sufficient provision for...conservation and enhancement of the natural, built and historic environment, including landscapes*’ (inter alia). This is critical to ensure that environmental matters and landscape are given appropriate consideration at the plan-making stage.

We therefore consider that PM2 (1) (a) (iv) should be expanded to read “*has particular regard to meeting the identified development needs of the area in a sustainable manner in accordance with policy S1, **along with addressing other economic, social and environmental priorities***” (bold text = additions, reinserted text from current NPPF para 15).

And that PM2 (1) (a) should be expanded with a point (v) as follows: “***makes sufficient provision for the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.***” (bold text = additions; includes reinserted text from current NPPF para 20):

Further, we consider that PM2 (1) (b) needs to include specific reference to the presumption against major development in protected landscapes, i.e. to N4 (2), which is presently solely a ‘decision-making’ policy. Suggested additional wording: “***When considering potential allocations within Protected Landscapes, the requirements of Policy N4 (Protected Landscapes) relating to major development should be applied.***”

It is critical that a consistent position is taken to major development in protected landscapes at both plan-making and decision-making stages.

Indeed, legal advice provided to the South Downs National Park Authority by Landmark Chambers concluded that “it would arguably amount to an error of law to fail to consider paragraph 116 [currently 190, proposed N4 (2)] at the site allocations stage of plan making for the National Park. The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF”.

PM14 Examining spatial development strategies

Question 19 Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly disagree

a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?

We are concerned with the inclusion of the phrase in proposed policy PM14 (2) (a) “A strategy which does not provide for objectively assessed needs should be considered an exception”; we are concerned that this would fail to reflect S1 (1) (a) (i). That policy importantly allows LPAs to plan for less than the objectively assessed need (OAN) in certain circumstances, i.e. where the application of the policies in this Framework that protect assets such as protected landscapes provides a strong reason for restricting the overall scale, type or distribution of development in the plan area. We are genuinely concerned that this disconnect between PM14 and S1 in this respect would render the application of S1 highly difficult, if pre-empted by the OAN in an SDS. We therefore consider it essential that PM14 (2) (a) also includes explicit reference to taking account of S1 (1) (a), in the same way that PM15 (1) (a) does with regard to examining Local Plans.

4. Achieving sustainable development

Plan-making policies

S2 Producing a Spatial Strategy

Question 34 Do you agree with the proposed approach to setting a spatial strategy in development plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree

The National Landscapes Association are very concerned that several of the requirements of the current NPPF for plan-making regarding the environment and landscapes have not been carried forward into PM2 or S2. We are worried that cumulatively this results in the de-prioritisation of the environment in the plan-making policies.

Currently para 20 (d) of the current NPPF requires the overall strategy in plan-making to ‘*make sufficient provision for...conservation and enhancement of the natural, built and historic environment, including landscapes*’ (inter alia). This is critical to ensure that environmental matters and landscape are given appropriate consideration at the plan-making stage. S2 (1) (c) is considered inadequate in this regard, failing as it does to mention the natural, built and historic environment, including landscapes.

We therefore consider that S2 (1) (c) needs to be expanded as follows “*Land that is protected or proposed to be enhanced for specific purposes (such as habitat improvement) and which places limits on whether development proposals may be acceptable or where specific policies apply, **including making sufficient provision for the conservation and enhancement of the natural, built and historic environment, including landscapes; and...***”(bold text = additions; including reinserted text from current NPPF para 20):

Further, we consider that S2 (1) (c) needs to include specific reference to the presumption against major development in protected landscapes, i.e. to N4 (2), which is presently solely a ‘decision-making’ policy. Suggested additional wording: **“When considering potential allocations within Protected Landscapes, the requirements of Policy N4 (Protected Landscapes) relating to major development should be applied.”**

It is critical that a consistent position is taken to major development in protected landscapes at both plan-making and decision-making.

Indeed, legal advice provided to the South Downs National Park Authority by Landmark Chambers concluded that *“it would arguably amount to an error of law to fail to consider paragraph 116 [currently 190, proposed N4 (2)] at the site allocations stage of plan making for the National Park. The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF”*.

National decision-making policies

S3. Presumption in favour of sustainable development

S4. Principle of development within settlements

S5. Principle of development outside settlements

Questions 36, 37, 38 and 39

36) Do you agree with the revised approach to the presumption in favour of sustainable development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly disagree

37) Do you agree to the proposed approach to development within settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly disagree

38) Do you agree to the proposed approach to development outside settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

strongly disagree

39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

strongly disagree

a) Please provide your reasons.

The following comments relate to the three new decision-making policies S3, S4, and S5 (sustainable development) proposed to replace current NPPF para 11 (c) and (d).

The National Landscapes Association are very concerned that the current ‘exception’ or ‘qualification’ regarding the presumption in favour of sustainable development in the context of protected landscapes (and indeed other ‘assets’ such as heritage assets) set out in 11 (d) (i) of the current NPPF, has been omitted in proposed new policies S3, S4 and S5. This caveat in existing policy is currently heavily used, and a cornerstone of ensuring the delivery of appropriate new housing in National Landscapes to support thriving rural communities, which is compatible with, and does not compromise, the character and natural beauty of National Landscapes. The omission of this caveat would significantly weaken the protection of National Landscapes and would undermine the application of N4 Protected Landscapes.

It is critical that the presumption in favour of sustainable development in national decision-making policies S3 and S4 retain the same qualification as current para 11d(i): *“unless: i. the application of policies in this Framework that protect areas or assets of particular importance [see footnote 7, above] provides a strong reason for refusing the development proposed”*.

Without such qualification, the proposed S4 policy sets out a presumption in favour of development within settlements, without recognition of policies in the Framework that protect areas or assets of particular importance such as protected landscapes and designated heritage assets. (National Landscape impacts can often still be highly relevant within settlements, and settlement is often a key character component of the natural beauty of protected landscapes, while historic settlements often include a Conservation Area (a designated heritage asset)).

Meanwhile proposed S5 (1) sets out a presumption in favour of certain types of development outside settlements (including at (j) provision of housing where the LPA cannot demonstrate a five-year supply of deliverable housing sites), again without recognition of policies in the Framework that protect areas or assets of particular importance, and without distinguishing between statutorily designated and undesignated landscapes. This would significantly reduce the ability for effective application of policy N4 in Protected Landscapes.

Indeed it seems inconsistent that S5 (5) sets out that S5 does not apply to development proposals in the Green Belt or on land designated as Local Green Space (neither of which are statutory designations, but rather simply policy designations), but the same exemption is *not* given in

that policy to Protected Landscapes, which are statutorily designated. We would strongly advocate for Protected Landscapes to also be listed in the ‘exemptions’ of S5 (5), with policy N4 being referred to as the relevant policy against which development proposals should be assessed.

S4 (2) (c) and S5 (2) set out circumstances in which *‘the benefits of approving development proposals are likely to be substantially outweighed by adverse effects’*, placing special significance on those policies in the NPPF that use the word ‘refused’. While in the main these are the same as in the current NPPF, but as discussed above, one significant exception is the current paragraph 190, now encapsulated in N4(2) relating to major development within protected landscapes, which no longer contains the word ‘refused’. This means that the proposed change of wording in N4 (2) is even more troubling when considered in the light of S4 (2) (c) and S5 (2). Notwithstanding, this would still only introduce the ‘tilted balance’ element of current para 11 (d) (ii). The stronger, more important 11 (d) (i) - which allows for the situation where *“the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed”* – is still not reflected in proposed S4 or S5.

We therefore consider it essential to reinstate the current wording of para 11 (d) (i) into S3, S4 and S5. This will ensure consistency in the decision-making policies with plan-making policy S1 (a) (i) and give clarity regarding the application of other policies in the Framework (i.e. N4 for protected landscapes). We advise the wording of current 11 (d) (i) needs to be added to the end of both S3 (1) (a) and S3 (1) (b), and, for clarity and completeness, after S4 (1) and S5 (1).

13. Protecting Green Belt land

Plan-making policies

GB5: Beneficial Use of Green Belt Land

Question 134 Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree

The National Landscapes Association welcomes the explicit reference to Protected Landscapes, in this context.

However, we are concerned that the Glossary definition of ‘Grey Belt’ is proposed to be amended to omit the current phrase: *“‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development”*. We consider this phrase provides important clarification regarding Protected Landscapes and Grey Belt, and should be reinstated.

19. Conserving and enhancing the natural environment

Plan-making policies

N1. Identifying environmental opportunities and safeguards.

Question 179 Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree

Partly disagree

a) Please provide your reasons, particularly if you disagree

The National Landscapes Association are pleased to see the reference to Protected Landscape Management Plans in N1 (1).

However, we are very concerned about the loss in proposed N1, of the phrase *“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services”* currently in para 187 (b) of the current NPPF. This is an incredibly important perspective that underpins the more specific protections of protected landscapes. It is a key tenet of rural planning policy that was previously in PPS7 (2004), before being taken forward in the NPPF. We note that the phrase is incorporated in the introductory text box to Section 4: Achieving Sustainable Development, but we are concerned that without highlighting it in N1, policies and intentions are weakened (particularly as paragraph 10 states that the objectives at the start of each chapter are ‘for context only and should not be applied as either plan-making or decision-making policy’).

In order to better reflect a key tenet of rural planning and to set a context for the subsequent clauses of N1, we consider N1 (1) should be amended as follows: *“Development plans should **recognise the intrinsic character and beauty of the countryside**, safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, by....”*(bold text = suggested additions)

National decision-making policies

N4. Protected Landscapes

Question 182 Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

strongly disagree

a) Please provide your reasons, including how policy can be improved to ensure compliance.

N4 (1)

We welcome the change from ‘landscape and scenic beauty’ to ‘natural beauty’ in the proposed draft, as this aligns better with the underpinning legislation for National Landscapes.

The National Landscapes Association are very concerned about the omission in proposed N4 (1) of the statement (in current NPPF para 189) “which have the highest status of protection in relation to these issues [landscape and scenic beauty]”. This status-affirming phrase is a key tenet of planning policy for designated landscapes; it is a long-standing legacy from the old PPS7 in published in 2004, which set out “*Nationally designated areas comprising National Parks, the Broads, the New Forest Heritage Area and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty*” (PPS7 para 21).

National Landscapes are outstanding, iconic landscapes whose distinctive character and natural beauty are so precious that they are safeguarded in the national interest. They are of immense value to the nation, offering a wide range of public goods and services. For over 20 years, this context has helped support the delivery of appropriate new housing in National Landscapes, including affordable housing based on local needs, making an important and positive contribution to support vibrant and thriving rural communities, which is compatible with, and does not compromise, the character and natural beauty of the National Landscape.

The phrase “highest status of protection” gives a powerful message to LPAs and developers regarding the status of these landscapes and the level of scrutiny that needs to be applied to assessing proposals. The removal of this phrase would send a harmful negative message, the perception that protected landscapes no longer warrant such status nor merit such scrutiny.

We therefore consider it essential that the phrase clarifying that protected landscapes “***have the highest status of protection in relation to this issue*** [natural beauty]” is reinstated into N4 (1).

Further, in N4 (1) issues of weight and importance are described. We are very concerned about the switch from the current ‘great weight’ (of current NPPF para 189) to ‘substantial weight’ in the proposed policy, which now reads ‘*Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas*’.

We understand that this might be intended to provide consistency across the policies of the NPPF, however, the conservation and enhancement of protected landscapes reflects a statutory requirement associated with their national designation, (e.g. for National Landscapes in s85 of the CRoW Act), unlike numerous other themes in the proposed NPPF to which substantial weight is attributed, and which are purely policy based rather than having any statutory basis. We consider there should be a clear difference between the weight afforded to conserving statutorily designated assets (i.e. protected landscapes and indeed designated heritage assets in HE6) and that afforded to the other policy-based themes in the NPPF, as these two alone have a statutory basis. The weight to be applied to protected landscapes should reflect the statutory, nationally designated status of these assets.

We therefore consider the wording needs to revert to “**great weight** should be placed on the importance of conserving and enhancing the natural beauty of these areas.” We also consider a footnote should be added to clarify that ‘great weight’ is higher than ‘substantial weight’ in any weight hierarchy.

Further, in N4 (1) we are concerned about inclusion of the phrase “...to avoid harm to their statutory purposes and special qualities” – not only is ‘special qualities’ not a term recognised in the relevant legislation for National Landscapes (CRoW Act 2000), but we would be concerned that this approach could open the door to a reductive argument that focusses on how a specific proposal relates to the individual ‘special qualities’ of a Protected Landscape without recognising the holistic impact, and that fails to recognise that the landscape value of a Protected Landscape is greater than the sum of individual parts.

We therefore consider that, for clarity and consistency, this sentence should instead end “...**to avoid harm to their natural beauty and statutory purposes.**”

We consider it would be helpful for N4 (1) to include a footnote clarifying “**the natural beauty of each protected landscape will usually be described in their respective statutory Management Plans.**”

We also consider that it would be helpful to add on to the end of the last sentence of N4 (1) the following text, to reflect the content of the current NPPF: “...**which are also important considerations in National Landscapes.**”

We also consider that the text of proposed N4 (4) relating to setting of protected landscapes would be better located within N4 (1), for clarity and consistency.

N4 (2)

National Landscapes are outstanding, iconic landscapes whose distinctive character and natural beauty are so precious that they are safeguarded in the national interest. They are of immense value to the nation, offering a wide range of public goods and services. Current NPPF para 190 is already considered too lenient regarding major development in National Landscapes, and we are concerned that the wording of proposed N4 (2) would further dilute this.

We are very concerned that the proposed change to the current NPPF explicit presumption of refusal of major development in protected landscapes (i.e. ‘should be refused’ in para 190), to a ‘caveated approval’ (i.e. ‘should only be supported...’) in N4 (2) of the proposed new NPPF, represents a weakening of protection of these landscapes.

The term ‘should be refused’ is included in a significant number of proposed policies in the new NPPF, therefore, to retain the current presumption of refusal in Protected Landscapes would be consistent with other proposed NPPF policies.

We therefore consider it essential that the wording of the opening line of N4 (2) be amended from the proposed 'caveated approval' to revert the presumption of refusal in the current NPPF, suggested wording: **"Proposals for major development within protected landscapes should be refused other than in..."**

Further we consider Footnote 70 to N4 (2) should be expanded to clarify that the term 'exceptional' denotes rarity.

Also, we are concerned about the proposed text amendment from the current 'other than in exceptional circumstances, **and** where it can be demonstrated that the development is in the public interest', to the proposed version which omits the word 'and'. The 'and' is particularly important as it represents a dual requirement.

Further in N4(2) we consider the term 'public benefit' should be accompanied by a footnote to clarify that 'public benefit' in this context should reflect that protected landscapes are statutorily designated landscapes and protected for the nation's benefit, in the national interest.

N4 (3)

The National Landscapes Association considers the subject of mitigation is effectively covered in N4 (2) (c), and therefore N4 (3) is superfluous, and to avoid confusion should be deleted.

If it is retained, then we are concerned by proposed Footnote 71 to proposed N4 (3): *"Where significant harm cannot be mitigated, it may be appropriate to consider whether suitable compensation would be acceptable."* Under N4 (2) (c), and indeed under N4 (1), proposals that cause significant harm to protected landscapes that cannot be mitigated should not be being approved - and therefore the footnote is contradictory to the rest of the policy.

We therefore consider that if N4 (3) is retained, then proposed Footnote 71 should be deleted. The matter of compensation would instead be better dealt with by adding onto the end of N4 (3) suggested additional wording **"...and, as a last resort, considering whether compensation for any residual harms following mitigation would be acceptable"**

14: Achieving Well-designed places
DP1 A strategy for Design
<p>Question 146 Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p> <p>Partly agree</p> <p>a) Please provide your reasons, particularly if you disagree.</p> <p>The National Landscapes Association are concerned that useful descriptive, scene-setting text has been cut out from current NPPF chapter 12 para 131, which currently sets out that <i>“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development”</i> – whilst the intention to ‘slim down’ the NPPF policies is acknowledged, the loss of such phrases means that important messages are not communicated to applicants and decision-makers. We consider this phrase should be included in the contextual text box at the beginning of chapter 14, and if the phrase cannot be accommodated in DP1, then at the very least, we advise this type of cut text should be incorporated into additional paras in the NPPG.</p>
20: Conserving & Enhancing the Historic Environment
HE6: Proposals affecting designated heritage assets
<p>Question 189 Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p> <p>Strongly disagree</p> <p>a) Please provide your reasons, particularly if you disagree.</p> <p>The National Landscapes Association are concerned about the switch from the current ‘great weight’ (of current NPPF para 212) with ‘substantial weight’ in the proposed policy, which now reads <i>‘substantial weight should be given to the asset’s conservation’</i>.</p> <p>We understand that this might be intended to provide consistency across the policies of the NPPF, however, designated heritage assets are <u>statutorily designated</u>, unlike numerous other themes in the proposed NPPF to which substantial weight is attributed, and which are purely policy based. We consider there should be a clear difference between the weight afforded to statutorily designated assets (i.e. designated heritage assets and protected landscapes) and that afforded to the other policy-based themes in the NPPF. The weight to be applied to designated heritage assets should reflect the statutory, nationally designated status of these assets. We therefore consider the wording needs to revert to <i>“great weight should be given to the asset’s conservation.”</i></p>

1: Introduction
<p>Question 5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree</p> <p>Strongly disagree</p> <p>a) Please provide your reasons, particularly if you disagree</p>
<p>The National Landscapes Association are very concerned about the switch from the current ‘great weight’ of current NPPF in relation to protected landscapes with ‘substantial weight’ throughout the proposed new NPPF.</p> <p>We understand that this might be intended to provide consistency across the policies of the NPPF, however, protected landscapes and designated heritage assets are statutorily designated, unlike numerous other themes in the proposed NPPF to which substantial weight is attributed, and which are purely policy based. We consider there should be a clear difference between the weight afforded to statutorily designated assets (i.e. protected landscapes and designated heritage assets) and that afforded to the other policy-based themes in the NPPF. The weight to be applied should reflect the statutory, nationally designated status of these assets. We therefore consider the wording needs to revert to “great weight” in those two instances.</p>
<i>17. Pollution, public protection and security</i>
<i>P1: Planning for clean and safe places</i>
<p>Question 165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p> <p>Partly disagree</p> <p>a) Please provide your reasons, particularly if you disagree</p>
<p>We would like to see the list of types of pollution listed in P1 (1) (c) expanded to include light pollution, for completeness and consistency with P3.</p>
<i>Further Questions</i>
<p>Question 193 Do you have any further thoughts on the policies outlined in this consultation?</p> <p>The National Landscapes Association have an overall general concern about the dilution of the clear messaging of the current NPPF regarding the importance of protected landscapes in the draft consultation version, through both individual points and cumulative impact.</p>

National Landscapes are outstanding, iconic landscapes whose distinctive character and natural beauty are so precious that they are safeguarded in the national interest. They are of immense value to the nation, offering a wide range of public goods and services.

For over 20 years, current national planning policy has helped balance the protection of such landscapes along with supporting the delivery of appropriate new housing in National Landscapes, including affordable housing based on local needs. It has helped ensure new development makes an important and positive contribution to support vibrant and thriving rural communities, which is compatible with, and does not compromise, the character and natural beauty of the particular National Landscape. We would therefore be very concerned about any change to national planning policy which would diminish that potential.



South Devon
National
Landscape

Partnership Meeting

to be held at

10am on Friday 13 March 2026

Repton Room at Follaton House and via Zoom

Annex to Meeting Papers

South Devon National Landscape team, Follaton House, Totnes, TQ9 5NE
Telephone 01803 229330 Email enquiries@southdevon-nl.org.uk

Agenda item 10A: Planning applications consultations *updated 4 March 2026*

ITEM FOR	INFORMATION	REPORT BY	Roger English, National Landscape Manager
SUMMARY	This report provides a brief update on Local Planning Authority development management consultations since the November 2025 Partnership meeting that are pertinent to the South Devon National Landscape.		
MANAGEMENT PLAN THEMES	<p>All PLACE: Landscape character; Natural resources & climate; Biodiversity & geodiversity; Historic environment; Farming and land management; Coast & marine; Rivers & estuaries.</p> <p>All PEOPLE: Tourism, access & recreation; Planning & sustainable development; Transport & highways; Rural economy & services; Community & culture.</p>		
RECOMMENDATION	<p>Partnership members are recommended to:</p> <ul style="list-style-type: none"> i. Note the level of resource commitment currently applied to the type of development management consultations, bearing in mind the South Devon National Landscape Planning Protocol, in addition to strategic and neighbourhood plan demand across the local planning authority areas. Keep this under review. ii. Continue to provide early notification of significant planning matters to the National Landscape Manager to enable timely and appropriate action to be taken. 		

Key Activity

Planning Caseload

1. In the rolling year 2025/26 to date, Local Planning Authorities (LPAs) have formally consulted the National Landscape team on 51 applications. In addition, the team has been consulted on 10 pre-applications, the Torbay Local Plan 2025-2045, 1 Neighbourhood Plan, 3 Marine License applications, 1 dredging application, 13 woodland creation or felling/restocking licences, 4 transformer refurbishment consultations, 1 exemption consultation for tent pitches and 2 planning appeals – one hearing, one written representation.
2. In total, there have been **27** new consultations/re-consultations since the last update.
3. Summary of activity since the last update:
 - **13** cases that LPAs have determined
 - **20** completed responses on cases that LPAs are yet to determine
 - **3** cases under consideration with responses currently in development
 - **2** pre-applications responded to / response in development
 - **1** Torbay Local Plan
 - **1** Neighbourhood Plan
 - **5** woodland creation or felling/restocking applications
 - **1** Dredging application
4. Note the applications with completed responses and an LPA decision as at the November Partnership meeting are treated as closed and are not reported again in the table below. Wording in ‘normal’ text signifies this appeared on the last planning update, with any changes/updates noted in ‘**bold**’ text
5. The following table lists the planning cases pertinent to the period:

App Ref	Application Type	Decision	In accordance with NL advice / guidance	NL Major	Comments
13 Applications - LPA decision made					
APPEAL APP/X1165/W/25/3368343	Land Off St Mary's Road, Brixham Demolish industrial buildings, erect 28 residential dwellings	Allowed	Objection	N	Related application P/2023/0553 Appeal being dealt with via written representations
2063/25/FUL	Land at SX 719 490 Loddiswell Change of use from builders yard to Class B8 open air storage, close existing vehicular access, form new vehicular access	Approved	Further information required	N	
1709/25/FUL	Overbecks Sharpitor Salcombe Create new path to improve accessibility at East Soar	Withdrawn	-	N	
2816/25/FUL	Land At Sx 649 485 (Langston Farm) Kingston Erect 2 agricultural buildings, midden building	Approved	-	N	Objection but then amends made to enhance landscaping
2967/25/ADV	Car Park Wembury Advertisement consent for 1 free standing information board	Approved	-	N	
2870/25/ARC	One Gun Point, Castle Road, Dartmouth, Application for approval of details reserved by condition 3	Refused	-	N	Related application 0751/18/FUL
P/2025/0701	Land At Mathill Road & Monksbridge Road Brixham Scoping Opinion for up to 175 dwellings, a 105 bedroom hotel and a 85 bedroom care home	Scoping Reply	Scoping Reply	Y	No provision for public comments to be taken into account determining screening/scoping opinions
0937/25/FUL	Overbecks Sharpitor Salcombe Access track to improve accessibility	Withdrawn	-	N	
3208/25/FUL	Former South Milton Sands Cafe Replace fire demolished beach cafe	Approved	No objection	N	
3333/25/HHO	Carpfisher Renney Road Heybrook Bay Rear, Side & Front Extensions, Garage Conversion, New Access & Garage	Approved	Objection	N	
3651/25/PIP	Land North of Sutton Cross House South Milton Permission in principle for one custom / self-build dwelling	Approved	Objection	N	
3589/25/CLE	Gara Rock Car Park East Portlemouth Certificate of lawfulness for existing use of land adjacent to Rickham Farm as a public car park	Withdrawn	Objection	N	
3518/25/FUL	Land at Moul Hill Salcombe Construct dwelling, including integral garage, access drive and landscaping	Refused	Objection	N	
21 Applications - Response submitted - LPA (or PINS) still to determine					
2798/23/FUL	North Embankment Dartmouth Proposed new slipway	-	Conditional Support	N	
MLA/2025/00021	Blackness Marine East Cornworthy Create recreational access via gangway to existing island pontoon	-	Objection	N	
4276/22/FUL	Field North Of Batson Cross Sx732394 Batson Hill Salcombe Erect 21 units of affordable housing	-	Objection	Y	
P/2025/0584	Brixham Community College Artificial Pitch, fence, hardstand, storage, floodlights, access footpath and topsoil bund	-	Holding objection	N	
MLA/2025/00199	Harbour Watch East Portlemouth Construct slipway to provide vessel access from a, to be constructed, boathouse to the estuary	-	Objection	N	

App Ref	Application Type	Decision	In accordance with NL advice / guidance	NL Major	Comments
P/2025/0488	Land To The Rear Of 39 Wall Park Road Brixham Construct two dwellings with detached double garages	-	No comment	N	Not in SDNL or setting
2835/25/CLE	Primrose Meadow Loddiswell Certificate of lawfulness for existing use land for stationing of caravans for purpose of human habitation	-	Objection	N	Raised by member of the public. Operations are linked to
3006/25/FUL	Horsewells, Parsonage Road, Newton Ferrers Change use from agricultural to equestrian, including stable yard, turn out area, horse shelter, storage barn & associated works for private use	-	Objection	N	
3190/25/VAR	Paradise Point Ravensbury Drive Dartmouth Variation condition 2	-	Emailed with questions	N	Related application 2260/22/HHO
3341/25/FUL	Fish Hoek South Town Dartmouth Alter & Extend Fish Hoek & Waterside Demolish Flat Roof Extension To Fish Hoek & Erect Two New Dwellings	-	Objection	N	
3700/25/FUL	Historic Ruin at SX 573 468, Noss Mayo Repair & reinstate historic belvedere at Beacon Hill & establish private tea house	-	Objection	N	Waiting for follow up
P/2025/0779	Football Ground Haycock Lane Brixham Single storey flat roof extension to Sports Pavillion. Form canopy South of existing football field	-	No comments	N	
3688/25/FUL	Black Torrs Chapel Road Yealmpton Demolish existing & erect replacement dwelling	-	Comments provided	N	
3567/25/VAR	Bovisand Harbour (formerly Fort Bovisand) Vary conditions 2 & 7	-	Comments provided	N	Related application 4538/21/VAR
3213/25/FUL	Little Rowden Agroforest Noss Mayo Yurt & washroom for temporary rural workers accommodation, proposed polytunnel & change of use of land to mixed use for agriculture, arboriculture, forest school & outdoor craft & music teaching centre	-	Object and comment	N	Retrospective
3721/25/VAR	Land at SX 719 490 Loddiswell Vary condition 2, remove condition 3	-	Comments provided	N	Related application 2063/25/FUL
0252/26/FUL	Trowbridge Farm Churchstow Three new agricultural highway accesses & agricultural track	-	Comments provided	N	
3669/25/FUL	Worden Farm Dartmouth 104 ground mounted solar panels	-	Offer to provide advice if required	N	
0292/26/FUL	Building Rear Of Kia Ora Wembury Road Wembury New dwelling, garage outbuilding, and change of use of land to domestic garden	-	Comments provided	N	Readvertised – amended description Related application 0962/25/PIP
2982/21/FUL	Land Opposite Butts Park Newton Ferrers Erection of 20 residential units	-	Comments provided	Y	Revised plans Sep '23 (NL objected to original plans) Awaiting legal agreement
2 Applications - Responses under consideration					
P/2024/0720	Landscape Holiday Village, Brixham Part demolish facility building & remove swimming pool. Single storey extension for new swimming pool, gym and plant room. Alteration of roofline from hip to gable, new raised terrace, openings, maintenance building and altered electrical building + 8 new parking spaces.	-	-	N	

App Ref	Application Type	Decision	In accordance with NL advice / guidance	NL Major	Comments
1561/25/FUL	Collapit Creek House & Old Coach House, Gerston Demolish & replace Collapit Creek House, Coach House & associated annex & outbuildings, associated driveway, vehicular parking, new swimming pool	-	-	N	

Item Ends.