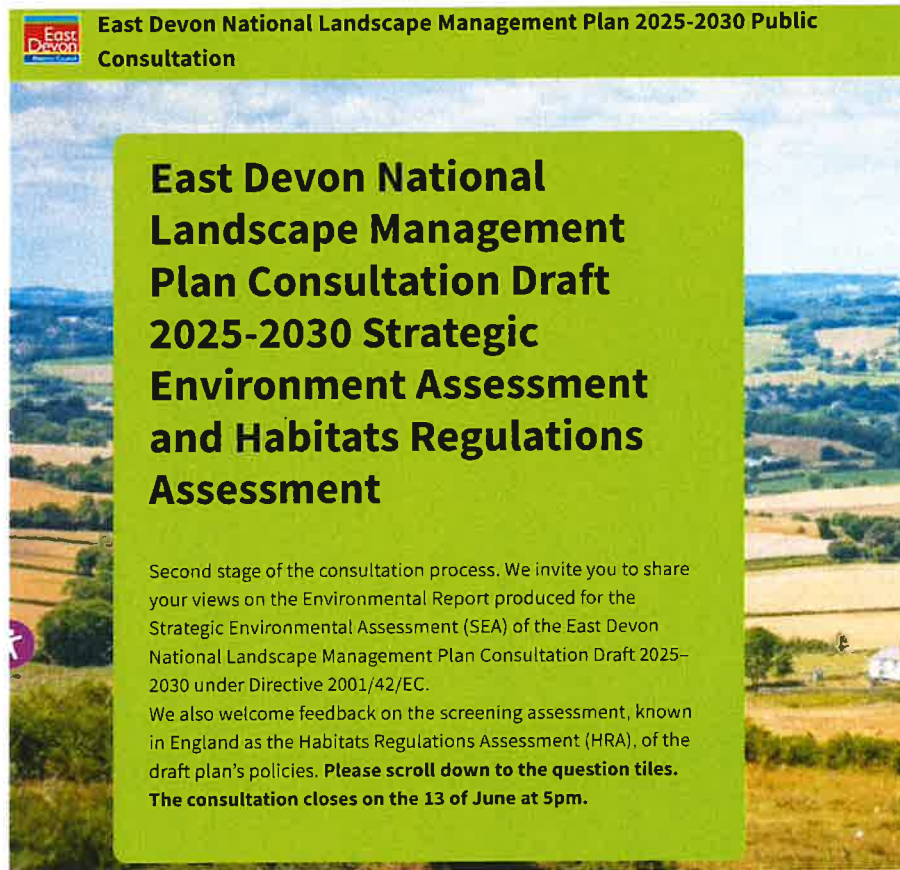




## **Budleigh Salterton Town Council**

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**East Devon National Landscape Management Plan 2025-2030 Public Consultation**

**East Devon National Landscape Management Plan Consultation Draft 2025-2030 Strategic Environment Assessment and Habitats Regulations Assessment**

Second stage of the consultation process. We invite you to share your views on the Environmental Report produced for the Strategic Environmental Assessment (SEA) of the East Devon National Landscape Management Plan Consultation Draft 2025-2030 under Directive 2001/42/EC.

We also welcome feedback on the screening assessment, known in England as the Habitats Regulations Assessment (HRA), of the draft plan's policies. **Please scroll down to the question tiles.**

**The consultation closes on the 13 of June at 5pm.**

**Budleigh Salterton Town Council  
has responded to this  
consultation.**

**Full response available [here](#).**



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## **Environmental Report for the Strategic Environmental Assessment of the EDNL Management Plan Consultation**

**Overview:** The aim of this consultation is to get your opinion on the Environment Report which has been prepared as part of the Strategic Environmental Assessment undertaken on the East Devon National Landscape Management Plan Consultation Draft 2025-2030, as required under European Directive 2001/42/EC.

**Background:** The requirement to undertake Strategic Environmental Assessment (SEA) is established by the European Directive 2001/42/EC of the European Parliament and of the Council on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). All National Landscape Management Plans require an SEA.

Proposed responses:

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Question 1) Are you responding as a:  
**Buddleigh Salterton Town Council (BSTC).**

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Question 2) Comments or feedback on the conclusion of the Strategic Environmental Assessment (SEA) Environmental Report?

*The Vision for the National Landscape is founded on the principle of sustainable development, to secure protection for the area's natural beauty and deliver an enhanced landscape which can be enjoyed by and benefit present and future generations. This assertion is supported by the outcome of the assessment.*

*Whilst in practice there are many organisations that would continue to contribute to the NL's protection, there is no single organisation or regulatory mechanism with a complete overview or wide-reaching influence over everything with potential to impact on the NL. It is possible that without the implementation of the NL Management Plan the cumulative effect of uncoordinated changes in direction in the management of the natural and built environment could threaten the area's environmental quality and distinctiveness – factors central to its designation as a National Landscape.*

### **Exec summary – key message:**

**Buddleigh Salterton Town Council (BSTC) was not consulted on site EXMO-20 or related allocations: routing 700 homes' traffic along the B3179 will expose the Pebblebed Heaths SPA to harmful light, noise and visitor pressures, while siting ~1,800 residents next to a small conservation town undermines local carbon-reduction and climate strategies.**

**BSTC is concerned that no consultation or consideration has been undertaken regarding the impact of EXMO-20 on the East Devon Heaths SPA (Pebblebed Heaths UK0012602 and East Devon Heaths UK9010121). None was carried out with the National Landscape in advance of this site being put forward for the development of 700 houses on the boundary of the SPA. With the preferred and only vehicle access (B3179) running alongside and slightly within the Pebblebed Heath, vehicle and light pollution will have an extreme and cumulative negative effect on this protected site, as will increased pedestrian tourism.**



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No consultation has been carried out with BSTC regarding the impact that an increase of around 1,800 people will have when situated within a mile of a Tier 3 town in a conservation area with a population of just over 6,000. No consultation has been undertaken with the National Landscape or with BSTC regarding P1 or P2 and the impact this will have on its Neighbourhood Plan's ambition to reduce carbon emissions, as well as those ambitions set out in the Devon Climate Emergency Plan and EDDC Climate Change Strategy and Action Plan.

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Question 3) Do you have any comments or feedback on chapter 4 (Main objectives of the EDNL Management Plan) of the Environmental Report.

**Exec summary – key message:**

**BSTC supports the Plan's five purposes but urges clear, time-bound accountability and explicit collaboration with EDDC and Clinton Devon Estates to prevent housing-led pressures from undermining National Landscape protection.**

**BSTC is in full agreement with the five key purposes of the Management Plan, particularly purpose 4 — identifying what needs to be done, by whom and by when – to achieve the outcomes in the annual Delivery Plan. BSTC is concerned, however, that if annual measures of success reveal shortfalls, the developments causing those failings may already be too far advanced for corrective action to be possible.**

**BSTC believes the East Devon National Landscape Management Plan 2025-30 must address this underlying concern by setting out its remit and objectives in relation to East Devon District Council (EDDC) and Clinton Devon Estates, and by acknowledging the conflict between housing-demand pressures within the National Landscape and the National Landscape's duty to protect it. It is therefore important that the parameters for collaboration and compromise are clearly defined, and that EDNL works proactively with EDDC, Clinton Devon Estates, affected towns such as Buddleigh Salterton, and local environmental groups to secure the best solutions, rather than leaving EDDC to determine matters in isolation.**

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4) Do you have any comments or feedback on chapter 5 and 6 (Scope of the SEA and Assessment Methodology) of the Environmental Report?

**The Scope and Assessment Methodology are comprehensive and just need quantifiable results.**

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5) Do you have any comments or feedback on chapter 7 (Developing Strategic Alternatives) of the Environmental Report?

**BSTC wants to work towards 'Best for Environment' alternative. The rapidly changing landscape, policies and influences means that "Business as Usual" as set out in 2019-2024 are no longer relevant.**

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6) Do you have any comments or feedback on chapter 8 (Assessment of policies against the SEA objectives) of the Environmental Report.

**Exec summary – key message:**

**BSTC welcomes the policies but stresses that delivery must match the positive intent; it seeks an active partnership with EDNL and EDDC to turn P1, P2, T1 and T2 into practical action and secure gains in CC1, CEA1-3 and M1.**

**Yes. The Environmental Management Plan sets out positive intentions, but there may be a gap between the stated aims and what is ultimately implemented in practice. Should that gap appear, strength and determination will be required. BSTC would welcome the opportunity to work in collaboration with East Devon National Landscape and EDDC to identify positive, practical solutions to its areas of concern, particularly around P1, P2, T1 and T2, and more broadly to use its unique position as a Town within the National Landscape to proactively achieve gains in CC1, CEA1-3 and M1.**





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## **A Screening Report for a determination under Regulation 48 of The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended).**

*The East Devon National Landscape Management Plan 2025-30 may only be adopted by the relevant local authorities after they have determined that it will not adversely affect the integrity of any European sites. This Plan concerns East Devon District Council and Devon County Council who are the competent authorities who must adopt this screening report. These sites contribute to the protection of habitats and species of high nature conservation importance in the European Community.*

*A strategic level, screening assessment, often referred to in England as a 'Habitats Regulations Assessment' (HRA), was undertaken on the policies in the Management Plan and highlights where there is a need to undertake additional assessment of actions under the annual Delivery Plan part of the Management Plan.*

*This report has been prepared by Daniel Wynn, Manager, East Devon National Landscape Partnership and has been based on the previous report prepared by Chris Woodruff in 2019. It has been undertaken with all reasonable skill, care and due diligence.*

- 1) Are you responding as a?

### **Buddleigh Salterton Town Council (BSTC)**

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- 2) Do you have any comments or feedback on the conclusion of the Habitats Regulations Assessment (HRA) Screening Assessment?

Article 6(3) of Directive 92/43/EEC requires that 'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.'

#### **Exec summary – key message:**

**BSTC notes the absence of consultation on site EXMO-20: locating 700 homes (~1,800 residents) with sole access via the B3179 will expose the Pebblebed Heaths SPA to significant ecological risk through traffic, light and visitor pressures; BSTC seeks joint work with EDNL and EDDC to safeguard the National Landscape.**

**Buddleigh Salterton Town Council is concerned that no consideration or consultation has been undertaken regarding the impact of EXMO-20 on the East Devon Heaths SPA (Pebblebed Heaths UK0012602 and East Devon Heaths UK9010121) and the species of special interest identified in this report. No consultation was carried out with the National Landscape in advance of this site being put forward for the development of 700 houses on the boundary of the SPA. With the preferred – and only – vehicle access (B3179) running alongside and slightly within the Pebblebed Heath, vehicle and light pollution will have an extreme and cumulative negative effect on this protected site, as will increased pedestrian tourism.**



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**No consultation has been carried out with BSTC regarding the impact that an increase of 1,800 people within a mile of the town will have. Buddleigh Salterton is a small Tier 3 town in a conservation area with a population of just over 6,000. As the only town within the East Devon National Landscape, it takes its role as custodian of the East Devon landscape very seriously, as set out in its Neighbourhood Plan. BSTC would welcome the opportunity to work with EDNL and EDDC to identify the environmental challenges and find solutions that best protect the National Landscape.**

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- 3) Do you have any comments or feedback on chapter 6 (site screening) of the Screening Assessment?

Policies in the National Landscape Management Plan are considered to have the potential for effects on East Devon Heaths SPA (Pebblebed Heaths (UK0012602) and East Devon Heaths UK9010121) and require consideration in the screening assessment. In addition, the Lower Otter Restoration Project (LORP) near Buddleigh Salterton is now designated as compensation land for the Exe Estuary and therefore should be treated as if designated as an SPA and Ramsar site.

Relevant authorities<sup>7</sup> now have a new duty under the Levelling Up & Regeneration Act (LURA) whereby they must 'seek to further the purposes of the NL designation, which is to conserve and enhance the natural beauty of the National Landscape. When carrying out functions that may affect the National Landscape, even when these functions are carried out outside the National Landscape boundary, the Management Plan policies may be applied outside the National Landscape boundary. Especially given the new duties placed on relevant authorities. Also, the effects of policies may be observed outside the National Landscape boundary.

## **Exec summary – key message:**

**BSTC urges in it's letter to National Landscapes and in the Commonplace consultation that site screening fully consider effects on the Pebblebed Heaths SPA and the Lower Otter Restoration compensation site, apply the new LURA duty beyond the National Landscape boundary, and set a clear, collaborative remit with EDDC and Clinton Devon Estates to balance housing demand with landscape protection.**

**BSTC feels that the East Devon National Landscape Management Plan 2025-30 must address a key concern by articulating the remit and objectives, defining its relationship with EDDC and Clinton Devon Estates, and the impact and conflict of interests caused by the demand for housing development within the East Devon National Landscape and the National Landscape's remit to protect this landscape. It is important that collaboration and compromise are clearly defined and that EDNL collaborates proactively with EDDC, Clinton Devon Estates, impacted towns within the National Landscape such as Buddleigh Salterton, and local environmental groups to reach the best solutions, rather than leaving EDDC to determine what is best in isolation. Only then can an effective site-screening process be established.**



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- 4) Do you have any comments or feedback on chapter 8 (Description of the National Landscape Management Plan) of the Screening Assessment?

**Current Key Objectives within the Management Plan are:**

1. 1) Restore or creation 2691ha of new habitat outside protected sites by 2042
2. 2) Bring 80% of SSSIs into favourable condition by 2042
3. 3) All existing Priority Habitat outside of protected sites continues to be managed in favourable condition
4. 4) Increase tree canopy cover by 807ha by 2050
5. 5) Increase the diversity and abundance of wildlife across the Landscape
6. 6) Improve the water quality of key catchments
7. 7) Support and encourage environmental and renewable energy initiatives where appropriate
8. 8) Sustainable and reliable green infrastructure options for local and visitors alike
9. 9) Work collaboratively to ensure ecosystem services are restored at catchment- and landscape-scale
10. 10) Sustainable tourism opportunities fostering local economic growth in harmony with the Landscape
11. 11) Support and grow a thriving rural economy which balances sustainable land management with food production
12. 12) Collaborate with Local Authorities on green infrastructure and sustainable public transport options
13. 13) EDNLs historic environment is celebrated, valued and protected for future generations
14. 14) EDNL's natural heritage along our coast is celebrated, valued and protected for future generations
15. 15) Planning policy, guidance and new developments enhance the landscape character and qualities
16. 16) The National Landscape is perceived by a greater range of audiences who understand the NL designation, reason for rebranding and purposes of the Partnership

The purpose of the NL Management Plan is to set out the policy of the relevant local authorities towards the NL. Policies are purposefully protective towards the environment and will have varying degrees of influence on the way in which local authorities carry out their duties and functions in general and under other plans, such as the Local Plan, Transport Plans, Neighbourhood Plans and Shoreline/Beach Management Plans etc.

**Exec summary – key message:**

**BSTC supports the Management Plan's objectives and emphasises that they should guide EDDC's housing strategy; it seeks early, joint working with EDNL, EDDC, Clinton Devon Estates and local groups so sites such as EXMO-20 and EXMO-17 meet environmental goals rather than undermine them.**



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**BSTC recognises the challenges and pressures facing East Devon District Council and wishes to work with East Devon National Landscape (EDNL), EDDC, Clinton Devon Estates, South West Water and local environmental groups—such as The OVA and Plastic Free Budleigh—to ensure the key objectives of the East Devon National Landscape Management Plan remain front and centre of EDDC’s plans for meeting its housing needs. At present EDDC is working in isolation, having consulted neither EDNL nor BSTC, despite the impact its proposed developments (especially EXMO-20 and EXMO-17) will have on the Town Council’s ability to deliver the objectives of its Neighbourhood Plan. A collaborative approach would show what can be achieved by working together.**

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- 5) Do you have any comments or feedback on chapter 9 and 10 (Preliminary Considerations and Further Considerations) of the Screening Assessment?

For some policies the decision of No Likely Significant Effect will be obvious, and these can be screened out immediately.

At the other extreme, some policies will very clearly have a Likely Significant Effect. These will need to be taken forward for ‘appropriate assessment’ or removed from the Management Plan.

In other cases, the judgement about a Likely Significant Effect will be less clear cut. It is in these cases that it is necessary to consider further the nature of the effect, and its likelihood or risk of occurring. These will be taken forward for fuller considerations.

**Exec summary – key message:**

**BSTC argues that policies flagged as having Likely Significant Effects must stay in the Management Plan for full assessment, not be screened out, and asks EDNL and EDDC to work with BSTC so development pressures do not derail the town’s Neighbourhood Plan objectives.**

**Screening out or removing ‘Likely Significant Effects’ from the Management Plan would remove the main challenges that the EDNL faces over the next five years; these issues should remain within the Plan and form the core of its remit. The reality of our situation over the coming years may evolve in ways largely outside our control; if they do, then strength and determination will be required. BSTC wishes to meet the objectives set out in its Neighbourhood Plan and therefore reiterates its wish to work closely with EDNL and EDDC to help protect the town and local landscape from upcoming development and environmental challenges.**