



# **Budleigh Salterton Town Council**

Town Clerk: Mrs A Gater-Wildgust  
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## **Extra Ordinary Meeting of the Town Council 28 March 2025**

### **Agenda Item 3: East Devon Local Plan**

To receive and agree BSTC's representations to the Local Plan  
consultation

(note the following papers are for reference. Actual responses will be  
loaded to the EDDC Commonplace platform)



## **BSTC representation to EDDC Local Plan to 2042**

### **Representation on:**

#### **SP03 Housing Requirements by Designated Neighbourhood Areas**

Is the policy sound

4b

SP03 is not sound, particularly in addressing the local housing needs of Budleigh Salterton. Specifically, the plan does not adequately address the demand for affordable housing within the town. There is a notable deficiency in the provision of affordable housing in accordance with the housing needs of Budleigh Salterton, which prevents the plan from ensuring that the needs of the entire demographic are met, especially for low- to middle-income households. The current proposals do not demonstrate a sufficient commitment to achieving a balanced and sustainable housing market in the area. Additionally, Budleigh Salterton Town Council (BSTC) advocates for the inclusion of conditions in the granting of planning permission for any new developments, ensuring that appropriate infrastructure is in place to support the growing population. This includes, but is not limited to, sufficient school capacity, as outlined in the evidence presented elsewhere in the document (Ref: SD27). Without these critical infrastructure provisions, the plan will not adequately support the needs of the community in the long term.

4C

What modifications do you suggest to make this sound:

Increased and ringfenced affordable housing provision: The plan should be revised to allocate a greater proportion of housing units for affordable housing for local people, ensuring that the needs of low- to middle-income households are met.

Clear commitment to meeting demographic demands: The plan should provide clear, measurable objectives to meet the needs of the entire demographic spectrum in Budleigh Salterton. This involves not only increasing the quantity of affordable housing but also ensuring that a variety of housing types and sizes are available to accommodate diverse community needs.

By incorporating these modifications, SP03 would better meet the needs of the local population, ensuring it is both sound and responsive to the housing challenges in Budleigh Salterton.

5b

#### Failure in duty to Cooperate

Budleigh Salterton Town Council, and by extension its residents, have not been consistently engaged with in the ongoing discussions, which constitutes a failure in the duty to cooperate.

Not only is there a requirement to co-operate with organisations, EDDC has an obligation to ensure that development is viable, given infrastructure problems such as handling of sewage by SWW and the capacity and safety of Highways. Ongoing current local issues should be fully resolved before developments are given any go ahead.

## **BSTC representation to EDDC Local Plan to 2042**

### **Representation on:**

#### **SD01 – Chpt 5, Development in Towns and Villages**

3b, not legally compliant

The largest development within the Local Plan is located the furthest from the designated Tier 1 Town it is allocated to, and adjacent to Budleigh Salterton, a Tier 3 town situated within a designated National Landscape. This policy is not legally compliant as it fails to satisfy a number of the remaining key tests, including those related to sustainability, environmental impact, and the adequacy of infrastructure provision. Furthermore, this site was previously rejected by East Devon District Council's Housing and Economic Land Availability Assessment (HELAA) as unsuitable, indicating that it does not meet the necessary criteria for development in terms of environmental considerations and suitability for housing.

3c, what changes are necessary to make this part of the plan legally compliant?

To mitigate the impact of the development on the National Landscape, it is necessary to reduce the proportion of the site at Exmo\_20 that borders this protected area. The main access road to the site should be relocated away from the National Landscape and instead connect with more appropriate infrastructure, such as the newly planned Dinan Way road. Moreover, no site of this scale can fully comply with East Devon District Council's (EDDC) own policy requirements outlined in Chapter 6 'Mitigating Climate Change'. This is especially critical given the site's proximity to the National Landscape boundary and its location adjacent to the Pebblebed Heaths, making the heaths particularly vulnerable to environmental degradation.

4b – soundness – not sound

No consideration has been given to the main town affected by Exmo\_20, Budleigh Salterton. This development fails to adequately address local priorities and needs, and must go beyond the scope outlined in the Local Plan. Furthermore this development directly contradicts Policy OL05 of the Local Plan which sets out to prevent development that would 'damage the individual character and identity of settlements'. Budleigh Salterton Town Council (BSTC) note that there are, quite rightly, concerns listed regarding the protection of the St. John in the Wilderness Church and its surrounding environment. Equal consideration must be given to the broader National Landscape, including the Pebblebed Heaths Special Site of Scientific Interest (SSSI), which requires comprehensive safeguarding. It is essential that East Devon District Council (EDDC) refrains from promoting land for development that has already been rejected by its own

Housing and Economic Land Availability Assessment (HELAA), as this raises significant concerns regarding the suitability of the site for development. The impact of the proximity of such a large development on a discrete tier 3 town with limited infrastructure to accommodate the proportional increase in population and activity has not been taken into consideration.

The inclusion of Exmo\_20 in SD03 is in conflict with Policy PB01 of the Local Plan (Protection of internationally and nationally important wildlife site) and is not in accordance with the mitigation strategy and therefore renders SD03 unsound.

### **What modifications are required to make it sound**

This site was explicitly ruled out of the development programme by East Devon District Council's (EDDC) own criteria under the Housing and Economic Land Availability Assessment (HELAA), which classified the site as 'available but unacceptable.' Given that experts in this field have already determined the site to be unsuitable for development based on established planning and environmental criteria, we believe that no modifications can render this aspect of the plan sound. The decision made by those with the relevant expertise should be respected, as it reflected a thorough assessment of the site's suitability for development

### **5b Duty to Cooperate**

Budleigh Salterton Town Council has not been directly consulted on this matter, despite being the most proximate town to the proposed main access point for the Exmo\_20 development. Moreover, at the time we became aware that this site was to be included in the Local Plan, we were advised that the appropriate time to provide feedback to East Devon District Council (EDDC) would be during the formal consultation period for the plan. This lack of early consultation with the Town Council (representing the local community and residents) most affected by the development, undermines the effectiveness and transparency of the planning process

## **BSTC representation to EDDC Local Plan to 2042**

### **Representation on:**

#### **Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty)**

4. Do you consider this part of the ED Local Plan sound?

BSTC response:

4b.

This part of the plan is not considered sound. BSTC raises concerns regarding the soundness of Strategic Policy OL02, specifically in relation to the potential environmental impacts of a large-scale development, such as Exmo\_20, a site proposed to be situated on the boundary of the National Landscape. There is significant consternation about both the immediate and long-term effects of the development. During the construction phase, the development will lead to considerable ecological disruption including increased pollution, and disturbance to local wildlife. Moreover, there are ongoing concerns about the development's sustained environmental impact over its operational life, including issues such as increased traffic, resource consumption, waste generation, and potential degradation of the surrounding natural environment. These cumulative effects warrant careful evaluation and mitigation to ensure alignment with environmental sustainability objectives.

4c Please set out what modifications you consider necessary to make this policy sound

The access to the site needs to be moved away from the National Landscape boundary.

Budleigh Salterton Town Council request that East Devon District Council (EDDC) adheres to the Protected Landscape Duty outlined in Section 245 (Protected Landscapes)<sup>1</sup> of the Levelling-up and Regeneration Act 2023 (LURA), particularly in relation to the proposed development. This section emphasises the obligation to consider the impact of activities outside a Protected Landscape that may have an adverse effect on land within the Protected Landscape. In light of this, Budleigh Salterton Town Council urges EDDC to thoroughly assess and mitigate potential impacts of the development of Exmo\_20 on the adjacent protected landscape, ensuring that all and any consequences of development do not compromise environmental integrity or designated qualities of the Pebblebed Heaths and surrounding National Landscape.

## 5: Duty to Cooperate

Do you consider that this part of the plan fulfils the 'duty to cooperate' requirement

BSTC response

5b.

BSTC have questions about the cooperation that took place with National Landscapes (NL). There is insufficient information to confirm that NL have been sufficiently consulted as laid out in 2.4 of the 'East Devon Local Plan – Key Supporting Documents 002'

Furthermore, Budleigh Salterton Town Council notes, as documented in the referenced document and recorded in the minutes of the Strategic Planning Authority meeting on 5 September 2023, that Budleigh Salterton Town Council (BSTC) was not included within the Duty to Cooperate framework. Since that time, the Exmo\_20 site was initially deemed unsuitable by EDDC planners. However, late in 2024, this site was subsequently included in the emerging local plan, with the proposed access road onto the B3179.

At the moment this decision began to take shape, a development located just 2 miles from the small Tier 3 town of Budleigh Salterton, positioned on the edge of the National Landscape, should have prompted consultation with and inclusion of BSTC in the discussions. The site allocation came to the Town Council's attention in early 2025, prompting immediate contact with EDDC to seek further information and express concerns about the potential impacts of this development. At that time, BSTC was informed that the Regulation 19 consultation would provide the appropriate forum to address these concerns further.

Hearing: Yes, BSTC would like to participate in any hearing related to this representation in order to hear the evidence, in full.

1. Accessed 26.3.25: [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK](#)



**BUDLEIGH SALTERTON TOWN COUNCIL representation to EDDC Local Plan to 2042**

**Representation on:**

**Strategic Policy PB04: Habitats Regulations Assessment**

**Do you consider this part of the local plan sound?**

**No**

4b. Budleigh Salterton Town Council does not consider this part of the East Devon Local Plan sound due to the inclusion of the B3179 as the only access route for the development 'Exmo\_20' referred to in Strategic Policy SD01. This development impacts on the soundness not only of PB04 but also Strategic Policy PB01: Protection of internationally and nationally important wildlife sites'

The B3179 cannot safely accommodate the extra and excessive traffic the addition of 700 houses and 2 ha of employment space would generate, as proposed with the Exmo\_20 development. Furthermore, this traffic would have an adverse impact on both the landscape and biodiversity of the locality, in particular, the Pebblebed Heaths.

4c

Set out modifications that are necessary to make this part of the plan sound:

This is very difficult to achieve without completely rethinking the access route into a new and very substantial housing development in this sensitive location. Any transportation route should be re-routed to avoid the Pebblebed Heaths to mitigate potential environmental disturbances.

Additionally, scaling down the development project would help to minimise its overall environmental footprint by reducing habitat disruption, resource consumption, and potential pollution from vehicles and light.

Do you wish to participate in any hearings: Yes.





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## **Extra Ordinary Meeting of the Town Council 28 March 2025**

### **Agenda Item 4: Heath to Sea Recovery Project**

To receive and agree BSTC's representations to the consultation





# **Budleigh Salterton Town Council**

Town Clerk: Mrs Alice Gater-Wildgust  
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Ref: 2503/AGW/49

Date: 28 March 2025

FAO: Ms K Ellis  
Heath to Sea Project Manager  
Clinton Devon Estates  
By email

Dear Kirstie,

To follow is the formal response from Budleigh Salterton Town Council (BSTC) to the Heaths to Sea Landscape Recovery Consultation

Budleigh Salterton Town Council would like to be included within the boundary of this project. We would like to be in a positive position in terms of promoting the project; benefitting from the potential increase in green tourist footfall; and benefitting in terms of seeing improved leisure provision for the residents of the Budleigh Salterton. Also the town's inclusion within the footprint of the project will certainly help us to attract funding towards this outcome.

Budleigh Salterton Town Council would like to see the National Cycle Path rerouted to come into the town via Moor Lane rather than down Greenway Lane. The provision of cycle parking by the Public Hall would also allow people that cycle more generally and into town to be able to park and walk into the High Street.

Budleigh Salterton Town Council would like to see increased footpath provision from the town out to the countryside and increased links between existing footpaths. BSTC would also like to have discussions with Clinton Devon Estates and our neighbouring parishes to see what their aspirations are for this project and whether these can be linked. This links closely with the BS Neighbourhood Plan.

Budleigh Salterton Town Council would like to significantly increase the number of trees within the town boundary. This links closely with the BS Neighbourhood Plan and the ambitions of the Budleigh Salterton Climate Change Group. BSTC would like to work with Clinton Devon Estates to identify opportunities for wildlife corridors into, through, and out of town via this project.

Budleigh Salterton Town Council would like improved signage from Lime Kiln Carpark and from Otter Estuary Carpark to promote the High Street and the facilities that Budleigh has to offer. The town is not currently benefitting from LORP in a way that it could because LORP is not seen as part of the wider town.

Budleigh Salterton Town Council would like to see the creation of linked up and coordinated communication regarding this project between Heaths to Sea and Budleigh Salterton (also including Budleigh Information Centre, the Library, Shop Budleigh etc) to promote the opportunities, benefits and facilities offered by having Heaths to Sea and LORP on Budleigh Salterton's doorstep. We appreciate that Heaths to Sea staff members are consulting with many individual organisations within the town, and via these organisations with a wide range of people within Budleigh and this is extremely useful. However, this approach doesn't offer a cohesive opportunity for people to be able to vote on options or for the Town Council to perhaps be able to leverage funding opportunities to support the project. Budleigh Salterton Town Council is happy to help collate information from the various town groups.

24 March 2025

Your sincerely,

A handwritten signature in black ink that reads "Alice Gater-Wildgust". The signature is written in a cursive, flowing style.

Mrs Alice Gater-Wildgust  
Town Clerk