

Introduction

Clinton Devon Estates are the owners of a very large area of land within East Devon. As part of its interests, the Estate undertakes residential and commercial development and manages substantial farming and forestry operations. It is also an important custodian of the area's environment, notably the Pebblebed Heaths National Nature Reserve. The Estate therefore has considerable interest in the future form of development in East Devon.

The Estate has provided representations to the Council as part of previous consultations on the draft local plan and via the related call for sites process. They therefore have considerable interest in the policies and objectives as now set out in the current draft of the plan. On behalf of Clinton Devon Estates, we have therefore reviewed the plan and a number of observations on the policies are set out below.

Strategic Policy SP01 – Spatial strategy

Policy SP01 sets out the approach which is to be taken to the location of new development across the district. In essence, the approach is to focus most development towards the West End and also Exmouth, as the largest settlement in the district. Significant development is also proposed at the main towns of Axminster, Honiton, Ottery St Mary, Seaton and Sidmouth. Less significant development is also proposed at the larger villages (identified as Local Centres) and at certain smaller villages which possess a range of facilities (identified as Service Villages).

Paragraph 3.2 of the supporting text to the policy notes that the proposed approach is required to address the approach set out in the NPPF and to focus development on sustainable locations which reduce travel needs and offer transport choices.

Response

The overall approach proposed within Policy SP01 – of focusing most development towards the West End and Exmouth but with development also apportioned to a wide range of other settlements according to their size – is supported. The proposed strategy offers the ability to provide a balanced mixture of growth to meet local needs and to provide a diverse supply of housing sites.

We note that the town of Budleigh Salterton is identified as being within the Local Centre category of settlement. The other settlements within this category (Broadclyst, Colyton, Lypstone and Woodbury) are villages, very much smaller in size and with a much more limited range of facilities than Budleigh Salterton.

CLINTON DEVON ESTATES
RESPONSE TO THE EAST DEVON LOCAL PLAN 2020 – 2042 (REGULATION 19 PUBLICATION
DRAFT) CONSULTATION (MARCH 2025) BY BELL CORNWELL LLP

As part of the Estate's representations on previous drafts of the local plan, we highlighted that the identification of Budleigh Salterton as a Local Centre was not logical and was out of step with the Council's wider objectives of focusing development towards the most sustainable locations.

By way of illustration, Budleigh Salterton is a town and is a substantially larger settlement than the other settlements – all villages - identified as Local Centres. Commensurate with it being a town, it has a much larger retail and town centre role than those villages and in this regard its' offering exceeds that of Ottery St Mary which is identified in the category above, as a Main Centre.

It is also notable that that the amount of development proposed to be identified for the town is minimal (35 homes) and much less than the other and much smaller villages within this category: Broadclyst (124 homes), Colyton (61 homes), Lypstone (92 homes) and Woodbury (206 homes). The level of growth proposed for Budleigh Salterton is wholly inconsistent with that being identified for the other Local Centres let alone its stature as a town. It is also notable that villages within the lower, Service Village category, such as East Budleigh and Newton Poppleford (both of which, like Budleigh Salterton, are wholly within the National Landscape) are identified for similar or greater levels of growth as Budleigh Salterton. East Budleigh has an allocation for 22 dwellings whilst Newton Poppleford has an allocation for 55 dwellings. The levels of growth at these villages are not unreasonable given the need to provide a balance of growth right across the district but these help illustrate the perverse position being taken in the plan within regard to the status being attached to Budleigh Salterton in Policy SP01.

It is also noted that the draft housing requirement for Budleigh Salterton and set out in Strategic Policy SP03 shows that there is a need for the town to provide 132 homes during the plan period. Whilst some of this supply may come from windfalls, the size of this requirement strongly suggests that there is a need to plan for more growth than is currently proposed.

Given the above, Budleigh Salterton should be identified as being a Main Centre so that the spatial strategy more accurately reflects the size and range of facilities in the town. In turn, additional opportunities for growth should be identified around the town such as those previously considered via the Council's call for sites process. It is noted that the primary reason cited for not identifying significant growth at Budleigh Salterton is the town's location within the East Devon National Landscape. Whilst this is undoubtedly an important constraint, it is not a reason on its own to prevent development from coming forward especially in East Devon where other major settlements such as Sidmouth and Exmouth are also subject to similar or additional designations such as being within the

CLINTON DEVON ESTATES
RESPONSE TO THE EAST DEVON LOCAL PLAN 2020 – 2042 (REGULATION 19 PUBLICATION
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Coastal Preservation Area. As noted above, there are a number of smaller settlements which are wholly within the National Landscape but where a greater amount of housing growth is proposed. Experience of certain recent developments in East Devon clearly shows that development can be sensitively undertaken within the National Landscape using careful and thorough design.

As currently set out therefore and by identifying Budleigh Salterton as only a Local Centre, the spatial strategy is not sound and the Estate OBJECT to the policy as currently worded. For the reasons set out above, this aspect of the policy is not justified and is not consistent with national policy objectives and the draft plan's own objectives of focusing development in the most sustainable locations. Budleigh Salterton should be recategorized as being a Main Centre so that additional appropriate growth can be assigned to it. As well as helping to provide much needed housing supply, this will also provide source of additional affordable housing in a location where there is a particularly high level of unaffordability.