

EAST DEVON EMERGING LOCAL PLAN (ELP)

FURTHER PUBLIC CONSULTATION - JUNE 2024

COMMENTS FROM THE OTTER VALLEY ASSOCIATION

The Otter Valley Association has considered the current consultation topics, and has the following comments to make:

Green Wedges (Policy 78)

These areas of undeveloped land are extremely important, almost akin to mini green belts separating settlements. Although they are small in area, they provide vitally important functions, as identified in the policy. In particular stopping the coalescence of towns and villages, providing very valuable wildlife corridors, and open areas of high visual amenity close to built-up areas. Turning to the policy wording, we consider that it is important to set out these functions, and note that this part of the policy has been removed in the new wording. We consider that it should still be included.

Any proposals to reduce the size of these very important small wedges should be resisted. In particular the proposed housing site on fields to the West of Bedlands Road in Budleigh Salterton. If housing is built on this area, there will be no separation between the village of Knowle and Budleigh Salterton, apart from the small area adjacent to the Budleigh Brook. This area would be too small to fulfil its functions as a Green Wedge. Knowle is a distinct but small settlement, and would lose its identity if joined with Budleigh Salterton.

Coastal Preservation Area - Sidmouth to Budleigh Salterton

We agree with the strengthening of this policy and the area identified on Map 3, and the proposed changes at Otterton on Map 3A.

Nature Recovery and River Pollution (Chapters 6 and 13)

Whilst not part of the current consultation topics, the Otter Valley Association wishes to raise matters concerning the protection and enhancement of the River Otter catchment. The levels of phosphate in the river Otter are being monitored regularly and are constantly above the recommended level, leading to a deterioration of native plant and animal life. This is exacerbated in the summer by reduced water levels and warmer water. It is thought that 50% of the Otter's pollution is due to farming practices.

A major concern is the levels of E.coli found at Otter Mouth which are many times higher than recommended. The current problem is identifying the source of these high levels. There are 33 Combined Sewer Outfalls (C.S.O's) on the Otter. Additional building increases the pressure on sewage works some of which are already liable to overflow when

combined with heavy rainfall. When river levels are low any pollution such as animal waste, sewage and dangerous chemicals, becomes much more concentrated and damaging.

We have noted that potential development along the River Axe is constrained due to the level of phosphates, but this is not being addressed in any way in the River Otter valley. Housing proposals in the ELP along the River Otter (Honiton, Ottery St Mary and Budleigh Salterton) are currently around 900, whilst those for the areas next to the River Axe are about 1,267. All this additional housing along the Otter and the Axe will only increase the phosphate and other pollution levels within these rivers.

You will be aware of the recently designated Otter Estuary National Nature Reserve, which is an extension to the Pebblebed Heaths NNR. A new pilot Landscape Recovery Project is being undertaken by Clinton Devon Estates within the Lower Otter catchment. The initial survey work will identify ways to better promote the nature recovery network within the valley. These should be linked to the excellent nature protection policies in chapters 13 and 12 of the ELP. The District Council should look at promoting further national or local nature reserves and county wildlife sites within the Otter catchment to protect biodiversity.

We would urge you to look into this aspect of the ELP more fully, going forward. We believe that the River Otter valley is of high ecological importance, and should be afforded greater protection for its wildlife biodiversity and landscape beauty.

OTTER VALLEY ASSOCIATION

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