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Jean Quinn

Full name: Jean Quinn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors' surgery, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. Exmo_20 would increase the need for car travel, contrary to Figure 7- the energy hierarchy- and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Shane Rabik

Full name: Shane Rabik

Proposal:

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL05 of The Local Plan.

The main access point for this site is via the B3179. Which means that residents will have to travel between 4.2 and 4.3 miles to get to the centre of Exmouth, whereas the centre of Budleigh Salterton is only 2.2 miles.

This makes Budleigh Salterton significantly more accessible to the residents of this development for key facilities/services.

Currently Exmouth and Budleigh are separated in terms of functionality but this development would effectively merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

This is also a large site, so is Budleigh ready for this sudden increased demand?

(POLICY OL05: This policy stated that development will not be permitted if it could lead to or encourage settlement coalescence).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Shane Rabik

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy HE02 of The Local Plan - Development at this site will encircle the Grade II* listed St. John in the Wilderness Church and will have significant adverse effects on the remoteness and tranquillity that is so unique to this church and its surroundings.

This development will result in the loss of a unique peaceful and tranquil setting, not only for the congregation, but also the numerous visitors that come to pay their respect's to their relatives in the churchyard, and also those that visit the area to see the church and its settings. (POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OLO1 of The Local Plan.

The site is noted for its dark skies, tranquillity and wildness.

The proposed site will encircle the Grade 1[*] listed St John is the Wilderness Church and churchyard, which will result in its tranquillity, remoteness and dark skies being lost forever, regardless of any buffer zone being provided.

Along with the new light from the proposed housing development itself, and with the main access for the site being onto the B3179, which is directly opposite the SPA/SAC/SSSI, this would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Pebblebed Heaths as vehicles exit the site.

POLICY OL01 states that development will only be permitted where it would not harm the aesthetic and perceptual factors such as "tranquillity, wildness and dark skies").

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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Full name: Shane Rabik

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 13.23. of The Local Plan

The whole of this site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network.

Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night.

Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of this SPA.

This site provides a means of connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of this site.

The amount and variety of wildlife that utilises this land and the nearby SSSI Pebblebed Heaths is amazing, and will be lost if this site is developed.

(PARAGRAPH 13.23. The Local plan states that East Devon has diverse but fragmented habitats and aims to enhance biodiversity increasing habitat areas and connecting isolated habitats).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with paragraph 2.10, objective 8 of The Local Plan.

This will result in the loss of a considerable amount of land that provides an abundance of biodiversity, both on site and on the adjacent SAC SPA/SSSI.

This will adversely affect the natural environment (PARAGRAPH 2.10. Objective 8.

This states the objective "To protect and enhance our outstanding natural environment and support an increase in biodiversity").

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy PB04 of The Local Plan.

The Habitats Regulations Assessment (dated 30.01.25) highlights that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)."

With the majority of the traffic from this site going via the B3179 which runs along the edge of the SSSI Pebblebed Heaths (SAC/SPA), the emissions/pollution created will undoubtedly have a 'negative' impact on the air quality in this area.

(POLICYPB04 states that proposed plans must not affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017 (including SAC/SPA)).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL09 of The Local Plan.

The The Habitats Regulations Assessment (dated 30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)".

The main access point for this site is via the B3179 which runs along the edge of the SSSI Pebblebed Heaths.

This will lead to an increase in emissions due to the increase in traffic, which will also have a huge 'negative' impact on the air quality.

(Policy OL09 states that "permission will not be granted for development which would result in pollution that cannot be adequately mitigated").

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with policy PB01 of The Local Plan and is not in accordance with the mitigation strategy.

The number of houses being proposed at this site will cause considerable harm to the SSSI Pebblebed Heaths .

There must be numerous alternative sites that could accommodate the housing requirement which would cause less or no harm to the SSSI Pebblebed Heaths (SAC/SPA).

(Policy PB01 states that development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless they cannot be located on alternative sites that would cause less or no harm).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 2.6 of The Local Plan

This site is classed as 'Rural East Devon' due to its position outside of Exmouth.

This development will destroy not only the open countryside within it, but will also destroy the setting of a grade II * listed Church and churchyard which is currently in the middle of it.

This is the largest development on Exmouth and if approved will destroy yet another part of Rural East Devon.

(PARAGRAPH 2.6 states that "Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with policy TRO3, and figure 7 in the Local Plan.

No new sustainable travel arrangements have been proposed for this site that are viable.

The site will not promote walking/cycling due to the fact that it slopes steeply from North to South.

The main access point onto the B3179 for this development will generate major amounts of vehicle movements just to access services within Exmouth and the neighbouring villages. This will also lead to an increase in travel to and from the main towns/cities, and access to the main route out of the area via the M5.

(POLICY TRO3 states that where development is likely to generate significant amounts of vehicle movements planning permission will not be granted unless they can identify measures to secure new sustainable travel arrangements, taking into account (amongst other things) the scale of development and the availability of public transport, and walking and cycling opportunities).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph

3.34 of The Local Plan

This site will not add any crucial infrastructure such as a secondary school, doctors surgery, of dentists surgery.

Its will only add to an already creaking infrastructure.

In addition to this, its will also increase the pressure on our sewage system, which already has major issues and is regularly closing down our beaches and areas on the Maer.

This has been highlighted several times on national news and via the press.

How long before Exmouth becomes a place to avoid?

(PARAGRAPH 3.34 states that by directing growth to the tier 1-4 settlements their approach ensures development is concentrated in areas with existing infrastructure and services).

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with The Draft Local Plan which states that the access point for the majority of this site (if not all) be at the North of the site via the B3179.

This access point is approximately 4.3 miles from the centre of Exmouth and onto an already congested road that also is the main route in and out of Budleigh Salterton.

This is a busy route on a daily basis, and gets even worse in the holiday seasons. This will result in increased car travel requirements for the majority (if not all) of the site.

This proposed site is the largest in Exmouth, and its location does not promote less travel, nor will it do anything to reduce traffic congestion in and out of Exmouth.

This site cannot be classed as sustainable. (Paragraph 11.2 of The Local Plan promotes focusing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy TRO1.

This site slopes steeply from North to South, walking and/or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc. as the distances are too far.

The provision of walking routes, cycle paths or public transport will not alleviate the amount of car journeys this development would generate, especially taking into account the fact that the site topography, and the distance people will have to travel to access essential services/facilities.

(POLICY TRO1 proposes that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: In my consideration it is not sound as this site slopes steeply downhill from the North to the South.

Regardless of what the developer says, this will not promote walking and cycling. Key services and facilities for the bulk of this site are not within the stated 800m (approx 10 mins walk).

The likelihood is that residents will need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring towns/villages.

Who walks to do their main shopping, visit the doctors, dentists, etc?

This site is too isolated to be sustainable.

(Studies cited in the Local Plan show that people prefer to walk if their journey is not further than 800m/10 minutes walking each way)).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy SP01. This site cannot be seen as promoting the most significant levels of development as the principal centre of Exmouth.

This is the largest proposed development for Exmouth, yet the main access point for this site is via the B3179, which makes Budleigh Salterton town centre (at 2.2 miles away) over 2 miles closer than Exmouth Town centre.

This site cannot be considered to be a development in Exmouth and is an unsustainable location. (POLICY SP01 proposes to promote the most significant levels of development at the principal centre of Exmouth).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site criteria to be considered as a 'reasonable alternative' confirms that Exmo_20 cannot be a reasonable alternative as it failed the HELAA stage being deemed "not suitable or achievable" (HELAA Appendix E(v)1).

Its allocation is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: In my consideration it is not sound due to issues surrounding Climate change and carbon emissions.

A reference was made to “Development that minimises the need to travel by providing access to public transport, and cycling tracks.”

Allocation of Exmo_20 would not minimise the need to travel, as it is in an unsustainable location with the main site access point now out onto the B3179 country road. Allocation of this site is unjustified.

Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: In my consideration it is not sound due to a direct contradiction with The Environment Act 2021, within which there is a stated commitment to conserve and enhance the habitat and wildlife of our natural environment, Natural habitats and biodiversity; flora and fauna, and to Ensure current, and potential future, habitat connectivity is not compromised.

Allocation of Exmo_20, a supporting habitat for foraging Nightjars would be contrary to this.

Furthermore Exmo_20 is located on the SNA 368 which is being allocated as a site with the Devon Local Nature Recovery Network (LNRS) as required by the Environment Act 2021, so allocation would be in conflict with this strategy of conserving and enhancing the habitat and wildlife of our natural environment.

Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 for housing allocation should be selected, as Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI /SAC /SPA /NNR) due to Exmo_20 being a supporting foraging habitat.

Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Contrary to POLICY OLO5 of the local plan, this project would lead to coalescence of Budleigh Salterton and Exmouth.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: For the sake of continuity and accountability

Su Randell

Full name: Su Randell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmouth-20 is significantly closer to Budleigh than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh, shops, school, doctors etc would be the preferred choice for residents of Exmouth-20. This undermines the settlement hierarchy and would lead to coaxes of Budleigh and Exmouth contrary to POLICY OLO5 of the Local Plan. An alternative site for Exmouth-20 should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo-20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmouth-20 being a supporting foraging habitat. Developing Exmo-20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo-20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade 11* listed church and churchyard, drastically altering the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HEO2. Exmo-20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the “tranquility, wildness and dark skies “ of the countryside, which is contrary to POLICY OLO1 Exmo-20 development would be in conflict with the strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.9 Exmo-20 is in conflict with POLICY OLO9 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed HeathsSAC/SPA) such that the plan fails the integrity test Development of Exmo-20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth which is already beyond its design capacity. This is in conflict with POLICY ARO1B Exmo-20 would increase the need for car travel and increase traffic congestion, in conflict with

PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the local plan Do not access the site via the B3179 or Southern Wood.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Clare Ratcliffe

Full name: Clare Ratcliffe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to object to the possible planning permission which will be sort by LVA for farmland on the East side of the village of Broadclyst. The Neighbourhood Plan, which cost a lot of money to prepare, did not include Winter Gardens as suitable for residential building so was not earmarked for residential building by Broadclyst Parish Council but it has been Identified by speculators (LVA) who have little interest in local needs but more of how much money they can make. There are better places to build and have been built in Broadclyst Parish which have been more than enough for the quota that EDDC wants. The area and number of houses proposed would be detrimental to the village of Broadclyst which is already struggling to cope with sewerage, flooding, traffic, schooling and healthcare. The land at Winter Gardens is productive farmland and is home to healthy biodiversity and if so many houses and ancillary buildings are built on it for car dependant people these things will be lost.

1. Sewerage; I have experienced lorries pumping sewerage out several times. Several villagers have had problems with sewerage backing up into their properties.

2. Flooding; There have been floods around Winter Gardens making adjacent roads impassable and on the land making the footpath difficult to negotiate. Also there is flooding every time it rains in Green Tree Lane making insurance difficult for some houses there. As I write there is standing water on a nearby road even though it has not rained for some time. 3. Roads; Planners don't know how many walkers (dog walkers and school children) and mobility scooters use the road between Woodland Road and Elbury Cross. More housing will make it even more busy and precarious than it is now

even though there is a 30 mph speed limit. Already there is a big problem, particularly during term time, at the road junction onto Station Road by the secondary school and between there and the B Exeter/Cullompton road where it is very narrow which will be even worse when the building for 15 houses is completed on Whimple Road

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4. Schools and healthcare.; Both the primary and secondary schools are full and there is no room for expansion. It is difficult to get an appointment with a doctor and no room for expansion nor money for more doctors and healthcare staff.

God save our farmland remembering that it will be more and more difficult to grow food if we covered it with concrete and tarmac. Please don't let our village be ruined.

elaine raymond

Full name: elaine raymond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to EXMO_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. EXMO_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to EXMO_20 being a supporting foraging habitat. Developing EXMO_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Z Reece

Full name: Z Reece

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Exmo_20 would destroy the tranquility, wilderness and dark skies of the countryside a n area of outstanding natural beauty.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I

object as this will have a detrimental effect increase use of car travel and congestion. It is an unsustainable development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Billy Reed

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The NPPF (188) states that “Plans must distinguish between the hierarchy of international, national and locally designated sites”. The Pebblebed Heaths are amongst the most important conservation sites in Europe. European sites have the benefit of the highest level of legislative protection for biodiversity, and there are also specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, that all public bodies are required to adhere. The Pebblebed Heaths are amongst the most important conservation sites in Europe, classified as a Special Protection Area for the UK population of breeding nightjar and Dartford Warbler, and Exmo_20 is functionally linked land; a supporting habitat for the foraging nightjar. Studies show that these fly from nesting sites to feed at night, and loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Allocation of Exmo_20 is in conflict with the NPPF (188), Local Plan policy PB01 and paragraph 13.23.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is complete conflict to The Local Plan policy OL01 which states that development will only be permitted where...it will protect and enhance valued landscape attributes and special features and qualities, including aesthetic and perceptual factors such as tranquility, wildness and dark skies. Adjacent to the Pebblebed Heaths(SPA/SAC/SSSI) the dark skies, wildness and tranquility are not only aesthetic and perceptual factors but vital conditions for the wildlife on the Heaths for which Exmo_20 provides a supporting habitat. Allocation of Exmo-20 would have a detrimental effect on this habitat which is a Strategic Nature Area, (SNA368) part of the on Devon Local Nature Recovery Network, and provides a wildlife corridor and stepping stone for wildlife on the double designated Pebblebed Heaths. The dark skies and tranquility are a valued landscape attribute of Exmo_20, both perceptually and functionally and would be destroyed by allocation of the site.

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Local Plan states that “primary vehicle access to the site, serving the large majority/bulk of development will be from the B3179 to the north”, meaning that the vehicular access point to Exmo_20 is closer to Budleigh Salterton (2.3 miles and Woodbury (3.4 miles) than it is to Exmouth(4 miles). From this point it is both closer and faster to drive to the town centre in Budleigh than to the town centre in Exmouth which would result in residents relying primarily on Budleigh for key infrastructure and services (high street/GP/primary school etc). Budleigh is a tier 2 town and could not support this. Policy OL05 of The Local Plan states that development would not be permitted if it could lead to coalescence. Allocation of Exmo_20 would lead to functional coalescence of Exmouth and Budleigh Salterton. Paragraph 3.34 of The Local Plan states that by directing growth to the tier 1-4 settlements their approach ensures development is concentrated in areas with existing infrastructure and services. Allocation of Exmo_20 is contrary to this; despite being labelled as an Exmouth site the reality is that the increase in population (expected 2000+) will be supported by Budleigh, a tier 3 settlement. Exmouth Community College is the catchment secondary school for both Exmouth and Budleigh and does not have capacity for a large increase in population, nor the physical space to enlarge and expand. Numerous children from Exmouth have been unable to secure a place there due to insufficient capacity and have had to travel to Cranbrook for secondary education. Existing sewerage systems in both Budleigh and Exmouth are wholly inadequate for the current population. The Local Plan is unsound; allocation of Exmo_20 is contrary to Policy OL05 and paragraph 3.34 of the Local Plan, contrary to NPPF 129c in failing to consider existing infrastructure problems and would result in a significant increase in “the unrestricted sprawl of large built-up areas”, something the NPPF specifies should be avoided (NPPF 143 a,b and c).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo-20 conflicts with NPPF 77 which outlines how large numbers of homes can best be achieved through new settlements or significant extensions to existing villages and towns which should be well located, supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Exmo_20 is neither a new settlement nor an extension to an existing town, it would be an isolated housing development. The NPPF then clarifies that “when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre” (NPPF 92). Exmo_20 is inaccessible and poorly connected to the town centre; Exmouth is a minimum of 4 miles by car from the proposed housing (and necessitates a circuitous car journey), up a steep hill and without cycle paths. It would be a development detached from the town without feasible connection to Exmouth. As such allocation of Exmo_20 is unsound and it should be removed from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 conflicts entirely with both the Local Plan and the NPPF. It is significant development in a location which would increase the need to travel, cannot offer a genuine choice of sustainable travel modes and would significantly increase congestion and emissions - all contrary to both chapter 9 of the NPPF and Chapter 11 of The Local Plan. Walking and cycling are not viable choices - the centre of the site is over an hour's walk at brisk pace to access the town centre/sports centre/train station/secondary school etc. and the topography makes walking as a primary choice unrealistic. Studies referenced in the Local Plan (HCO-OO2, evidence library) show that people are most likely to walk if their journey is not further than 10 minutes walk each way, beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Walking from is not a sustainable travel mode from Exmo_20. Both proposed access points lead to busy roads without any cycle paths so although cycle paths can be provided within the development cycling is not a safe or viable option to access anywhere outside of the site. Cycling is not a sustainable travel mode from Exmo_20. Travel from Exmo_20 would be by private car, yet the main (if not only) vehicular access to the site is proposed at the B3179, 4 miles away from Exmouth town centre - and the most distant point to the town from the whole site of Exmo_20. Furthermore due to the legal requirement that no residential dwellings can be built within a minimum distance of 400m from East Devon Pebblebed Heaths (SPA/SAC/SSSI), residents would be forced to drive between 0.4km and 0.8km in the opposite direction to Exmouth from their home just to reach the site entrance, resulting in not only more car journeys but also requiring cars to travel more miles, thus increasing both congestion and emissions. This lack of sustainable transport increases social exclusion for those without car access, such as young people, older people, those with disabilities, and low income households (Local Plan paragraph 11.3). The Local Plan also proposes that it is feasible for larger developments to be within 800m of key services and facilities yet the majority of site Exmo_20, one of the largest proposed

developments, will not be within 800m of any key services or facilities. Allocation of Exmo_20 is in conflict with policies TR01, TR03, paragraphs 11.2, 11.3, 11.4, 11.6 and figure 7 of the Local plan, therefore allocation of Exmo_20 is unsound

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 conflicts entirely with both the Local Plan and the NPPF. It is significant development in a location which would increase the need to travel, cannot offer a genuine choice of sustainable travel modes and would significantly increase congestion and emissions - all contrary to both chapter 9 of the NPPF and Chapter 11 of The Local Plan. Walking and cycling are not viable choices - the centre of the site is over an hour's walk at brisk pace to access the town centre/sports centre/train station/secondary school etc. and the topography makes walking as a primary choice unrealistic. Studies referenced in the Local Plan (HCO-OO2, evidence library) show that people are most likely to walk if their journey is not further than 10 minutes walk each way, beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Walking from is not a sustainable travel mode from Exmo_20. Both proposed access points lead to busy roads without any cycle paths so although cycle paths can be provided within the development cycling is not a safe or viable option to access anywhere outside of the site. Cycling is not a sustainable travel mode from Exmo_20. Travel from Exmo_20 would be by private car, yet the main (if not only) vehicular access to the site is proposed at the B3179, 4 miles away from Exmouth town centre - and the most distant point to the town from the whole site of Exmo_20. Furthermore due to the legal requirement that no residential dwellings can be built within a minimum distance of 400m from East Devon Pebblebed Heaths (SPA/SAC/SSSI), residents would be forced to drive between 0.4km and 0.8km in the opposite direction to Exmouth from their home just to reach the site entrance, resulting in not only more car journeys but also requiring cars to travel more miles, thus increasing both congestion and emissions. This lack of sustainable transport increases social exclusion for those without car access, such as young people, older people, those with disabilities, and low income households (Local Plan paragraph 11.3). The Local Plan also proposes that it is feasible for larger developments to be within 800m of key services and facilities yet the majority of site Exmo_20, one of the largest proposed

developments, will not be within 800m of any key services or facilities. Allocation of Exmo_20 is in conflict with policies TR01, TR03, paragraphs 11.2, 11.3, 11.4, 11.6 and figure 7 of the Local plan, therefore allocation of Exmo_20 is unsound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan, or reduce it dramatically and revert to allocating 150 homes at Exmo_20b.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Billy Reed

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.:

On page 340 of the Exmouth Sites connectivity and transport commentary it states that Exmouth is within 800m of A376 which is not true. Also incorrect is the use of a figure of 1,600m rather than 800m in the Exmouth Sites access to services commentary on page 338. 1600m refers to total trip distance, there and back. 800m is the distance which should have been cited in as a walkable distance according to the Government's National Design Guide. Using the 1600m is unjustified and misleading to those reading through Local Plan. Distances should be taken from central points of sites. Exmo_20 is a vast site stretching over a long distance top to bottom. It is crucial that the central point is used for distance measurements rather the nearest points. Distance measurement is used innacurately and in a misleading way several times with reference to Exmo_20 in the Local Plan, making it unjustified and unsound. The site access point is at the most northern point of Exmo_20; having used distances from the most southern parts - on a site approx 800m long, makes a material difference to the proposal and makes the allocation of Exmo_ unjustified and unsound.

Cora Reece

Full name: Cora Reece

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the 'tranquility, wildness and dark skies' of the countryside which is contrary to policy OL01.

Exmo_20 development is detrimental to the mental health and wellbeing of public at large as well as local residents who benefit from wide open spaces and wildlife in this area.

The proposal is in conflict with local habitats and wildlife contrary to policy OL09 and PB04.

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient accessible town. This would lead to coalescence of Budleigh and Exmouth contrary to policy OL05 and TR01.

The proposed development of Exmo_20 signals a permanent loss of agricultural land and food production for swathes of construction in the local and immediate area. This appears to be in disregard to the other issues already outlined as above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a local resident I have concerns about the changes to the immediate area of where I live and the impact/ affect this will have on my lifestyle.

Sally Regan

Full name: Sally Regan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Robert Richards

Full name: Robert Richards

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heath (SAC/SPA). Developing Exmo-20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. EXMO-20 would destroy the "tranquility,wildness and dark skies" of the countryside, which is contrary to POLICY 0L01. Developing EXMO-20 would fragment and isolate habitats and destroy wildlife corridors,contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to....air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo-20 is in conflict with POLICY PB04. Exmo-20 would have significant adverse effects on St. John in the Wilderness Grade 11 listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. Exmo-20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY ARO1B. Exmo-20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6 It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point to Exmo-20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh

(High Street, Doctors, school, beach etc) would be the obvious choice for residents of Exmo-20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY 0L05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Pauline Ann Richards

Full name: Pauline Ann Richards

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

The proposed site should not be accessed via the increasingly busy B3179. This road is narrow and already large lorries using this road are unable to stay on their side of the white lines, frequently causing difficulties to oncoming traffic.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Courtney Richards

Full name: Courtney Richards

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Remove Exmo_20 from the local plan
2. The proposed site should not be accessed from the B3179. This road is not very wide and large vehicles already drive out over the white line. Any increase in traffic will add to this already dangerous piece of road

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Courtney Richards

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This development would cause harm to the Pebblebed Heaths and Exmo_20 is contrary to Policy PB01 of the Local Plan. Areas at the bottom of the site are at risk of flooding. This development will increase the likelihood of flooding in areas lower than the proposed site contrary to Policy AR01B. Budleigh Salterton could not cope (doctors, schools etc) with the great influx of people given the proposed access site is closer to Budleigh Salterton than Exmouth

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The proposed site should not be accessed via the B3179. This road is narrow and already large lorries using this road are unable to stay on their side of the white lines, frequently causing difficulties to oncoming traffic.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Judith Richards

Full name: Judith Richards

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Dear Councillor The updated National Planning Policy Framework, paragraph 187, says that 'Planning policies and decisions should contribute to and enhance the natural and local environment.' Adopted East Devon Local Plan Strategy 25 states that 'Seaton has a role as an important Green Tourism destination on the Jurassic Coast' and this has to include protection of the panoramic views of the Axe Valley Estuary. It also states that 'Seaton's outstanding natural environment is its most precious and defining asset and policies for the conservation, enhancement and sensitive management of the landscape, heritage and wildlife of the area will be prominent.' Strategy 46 – Landscape Conservation and Enhancement - states that 'development will need to be undertaken in a manner that is sympathetic to, and help conserve and enhance the quality and local distinctiveness of the natural and historic landscape character of East Devon'. There is a consultation in the new Local Plan, at the moment, which asks people their opinion about the East Devon National Landscape Management (formally known as the Area of Outstanding Natural Beauty). EDDC's vision for 2050 is for 'A Wilder Greener Landscape where healthy ecosystems provide multiple benefits to society.' The special qualities of the landscape are recognised, protected, enhanced and conserved, safeguarding the area's rich heritage for generations to come. Emerging East Devon Local Plan - Strategic Policy OL01: Landscape Features - East Devon's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute to the character of East Devon's landscapes, and in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located. Strategic Policy OL02: National Landscapes (AONB) - The highest level of protection will be given

to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon. Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL. Policy OL04: Areas of Strategic Visual Importance – Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the District, in particular by conserving and enhancing key views. Policy OL05: Green Wedges - Green Wedges are a long standing local landscape designation that recognises the importance of maintaining open green networks between settlements in close proximity, for wildlife, flood storage capacity, leisure and recreation and prevent settlement coalescence in order to maintain a sense of place and identity for local communities. Within green wedges..... development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement or could lead to or encourage settlement coalescence, whether physical and or visual. (The Seaton Built-up Area Boundary has been moved northwards, effectively closing the Green Wedge between Seaton and Colyford, to allow for a development on good quality agricultural land) Strategic Policy PB01: International followed by nationally designated wildlife sites are of great importance and must be given upper most protection. Policy PB02: Protection of regionally and locally important wildlife sites. Policy PB03: Protection of irreplaceable habitats and important features. Development proposals which would result in the destruction or degradation of irreplaceable habitats will be refused.... Strategic Policy PB04: Habitats Regulations Assessment

-Nutrient neutrality in the River Axe. EDDC requires development proposals within the River Axe SAC catchment to demonstrate how nutrient neutrality will be achieved.

-Protection of Beer Quarry Caves SAC bat pinch points between Seaton and Colyford and between Colyford and Colyton. In order to protect the pinch points and secure their long-term suitability for the SAC bat species, the council will not support any applications which reduce the quality or functionality of the bat foraging and commuting habitats within these pinch points, such as through hedgerow/tree loss and adverse impacts from lighting. (A proposed development at Seaton contains a football pitch crossing one of these foraging and commuting habitats which would be adversely affected if there was any chance of flood lighting.) The Emerging Local Plan states that “This plan is underpinned by principles that seek to protect our outstanding landscapes and wildlife, while fostering vibrant, inclusive communities..... We will ensure that alongside new development there is greater care of the natural world with biodiversity improvements.....” The policies I have listed here seem to reinforce these aspirations. However EDDC’s vision for Seaton is significantly different in the emerging Local Plan compared to the adopted Local Plan that is in force at the moment. There is

conflict here. There are at least three development sites on Seaton's Green Wedges which have been put forward for housing!

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe that the emerging Local Plan needs to be amended to ensure that EDDC commits to the continued protection of our landscape, natural environment, wildlife and our Green Wedges. Once these have gone, they have gone for ever. The Local Plan must be deliverable, not just aspirational.

Laura Richardson

Full name: Laura Richardson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.

- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: N/A

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We cannot substantially withstand expansion of the village at present. We have lived here for 6 years and have been shocked by the extent of the flooding and sewage issues. I have listed details below as to all issues that make this development not sound:

Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.

- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.

- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

A Rider

Full name: A Rider

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Trevor Roach

Full name: Trevor Roach

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Hilary Robarts-Arnold

Full name: Hilary Robarts-Arnold

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We are wanting you to remove the areas within Seaton you have earmarked for development. Namely 75 houses in Barnards Hill Lane, 130 dwellings off Harepath Road and 39 dwellings west of Axeview Road. In terms of housing need, a general matrix has been used to come up with Seaton's allocation despite a housing needs assessment not being undertaken and despite Seaton's unique natural environment which needs protecting. There are currently over 120 properties on the market from £49,000 upwards plus those currently under construction at Fosseway Court and Seaton Quay with many other sites in the pipeline.

Our infrastructure is insufficient for any new developments. Town centre shops are very concerned which is borne out by the statement that Tesco would bring shoppers into the Town centre which has never happened.

There are so many other reasons that the Harepath Road area in particular should not be built on which has been written about endlessly and never taken note of.

David Roberts

Full name: David Roberts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Drs, school, beach et cetera) would be the preferred choice for residents of EXMO20. The infrastructure of Budleigh (High Street, doctors, school, beach etc.) This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo 20 housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Xmo 20 would cause harm to the adjacent pebble bed heaths (SSS1/SAC/SPA/NNR) due to Exmo 20 being a supporting foraging habitat. Allocating Xmo 20 is contrary to the HELAA, the site selection methodology and Policy PB01 of the local plan and not in accordance with the mitigation hierarchy to select avoidance over mitigation.

Exmo 20 would cause harm to the heritage assets as this Saxon Norman Medieval settlement most significantly St John in the wilderness grade 11 listed church, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to policy HE02.

Exmo 20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the tranquility, wildness and dark skies, which is contrary to policy OL01. Exmo 20 development would be in

conflict with the strategic nature area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to paragraph 13.23 of the local plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9. Exmo 20 is in conflict with policy 0L09 and policy PB04 as the habitats regulations assessment 30th of January 25 states that there is currently not sufficient certainty to rule out adverse affects in integrity in relation to air quality (East Devon pebblebed Heaths SAC/SPA such that the plan fails the integrity test. The main site access proposed is opposite the SAC/ SPA.

Development of Exmo 20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with policy AR01B.

Exmo20 would increase the need for car travel, contrary to figure 7 – the energy hierarchy and increase traffic congestion, in conflict with paragraph 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800 m to existing key services and facilities, contrary to paragraph 11.6. it is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to Policy TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Callum Roberts

Full name: Callum Roberts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into account

Donna Roberts

Full name: Donna Roberts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 for the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into account

Ian Roberts

Full name: Ian Roberts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure my objections are heard

Hayley Roberts

Full name: Hayley Roberts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

This long winded document and the common place system is the most un-user friendly system. By insisting that everyone uses this unfamiliar and complicated method to comment on the local plan EDDC are preventing many people from having their say. This goes for this version, as well as the last round of consultations. It is undemocratic and unfair. By using a different system to the normal planning system the public are being prevented from contributing. Therefore the planning officers will not be making informed decisions. I would also like to object that Feniton Parish Council were not allowed to speak on site Otry_20 because it was outside the parish boundary, but in this version of the plan it is included within our settlement boundary. It is not within the settlement. It is agricultural land with 1 large agricultural building.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I would like to see a final consultation, widely advertised and easy to access.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Feniton has a flooding problem. The, yet-to-be-tested flood alleviation scheme is designed to move flood water, not remove it. It is also not designed to take extra water. Site Feni_08 is uphill of the main flood area. Major, major suds will be required to prevent flooding downhill if this area is paved over.

The flood water will be moved from the village, to Pattersons Cross. This is the main entrance to the village and is expected to become impassable at times of heavy rain. Traffic will have to go through the old village, roads that are tiny, narrow, unit, single track etc. It was a disaster when the road was closed recently, at peak times it was taking people over an hour to leave the village. The school buses were late, coaches got stuck. Lorries got stuck. Old people didn't leave their houses because they were too scared to drive. I personally saw a car reverse into a moped. Car were damaged and the roads were damaged. Increased traffic, particularly large vehicles destined for Otry_20 will cause major problems.

Access to Otry_20 on Green Lane is also unsafe, even without the flooding problems. I use Green Lane to walk my children to school every morning. The proposed site of Ottery 20, for commercial/industrial purposes will use Green Lane as its entry point. The idea of extra traffic on that road terrifies me. Every morning I stand with my children, inches from cars as they edge over a single track railway bridge, often watching them reverse past my children when they realise, because it's a blind point, that another car is trying to come the other way. What happens when 2 lorries meet each other here? There are multiple blind points on the road, single carriage way, no footpaths and no street lights and secondary school children walk the other way, to the bus stop. The junctions at either end of the road are blind and single track, lots of pedestrians use the roads. The large vehicles from the flood relief scheme have also caused serious damage to the roads by the bridges. This ground is a made-up embankment and heavy vehicles are causing it to push out to the sides and therefore the road is collapsing. An increase in large vehicles on Green Lane will be very dangerous. This is not sound. Please watch my video of the road to help you understand why. Broad Road leading to Feni_08 isn't much better. <https://www.youtube.com/watch?v=6q7DQ6mpgh4> This size of this development is hugely disproportioned to the village, and isn't required by the governments new agenda/ statistics/demands for building. Why as a tier 4 village does it need a larger area for industrial, warehousing and distribution than Exmouth (Tier 1), Axminster (Tier 2) and Ottery St Mary and Seaton (Tier 3) The village has well known sewerage issues. Until these are rectified no more houses should be added to the system. SWW will not admit these problems, but they are real and hideous. Having to wade through raw sewage to get to the train station when it spills out of the drains is unacceptable. Residents having sewage backing up into their houses, because the

pipes aren't big enough is unacceptable. Adding anything else to the system without improvements is not sound. Feniton is not a sustainable place for development. The buses are trains are few and far between. We've had to buy two cars, because we cannot both reliably get to work and manage picking children up from school. The roads into the village are small, with pinch points and frequent flooding. In 2014 a super inquiry a planning officer determined that Feniton was not a sustainable location for large development. Nothing has changed since this inquiry apart from the flood relief scheme which is only mitigating the current flooding issues (and moving it away from houses and onto the road network). It is not designed to take extra capacity.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of Otry_20 from the plan. Reduction in area of Feni_08 to reduce impact.

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I don't know

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Justin Robertson

Full name: Justin Robertson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Ben Robinson

Full name: Ben Robinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Nicole Robinson

Full name: Nicole Robinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (high street, doctors, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jayne Robinson

Full name: Jayne Robinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

* ??The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * ??Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * ??Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. * ??The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * ??Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is

unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * ??The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Jeremy Robinson

Full name: Jeremy Robinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo 20 is in conflict with SP01. Exmouth (a Tier 1 town) is totally unsuitable for further growth, The centre of the town is wedged in by the coast and River Exe to the South and West and the sprawl of the town already to the North and East is running up to the escarpment formed by Woodbury Common (the Pebblebed Heaths) and closing in on neighbouring towns and villages, Any development here will be too far from the significant infrastructure of Exmouth and unsustainable!

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: No modification will make it legally compliant

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Totally unsuitable location, Transport of choice for residents of housing in the Southern area of the site seeking access to the Centre of Exmouth will have to drive a significant further distance in order to Exit to the East onto B3179 - the identified exit from the development (excluding the strip of 400m mandatory buffer zone). This will necessitate substantial further "car miles". Walking will be necessary to access even improved bus services and the topography will militate against cycle access.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There are none

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmouth is already deficient in infrastructure for its existing population. There is a need for additional Doctors surgeries and, particularly, dentists. The existing sewerage system is already demonstrably inadequate (Discharges into the Sea, beach closed for swimming regularly and regular features on National news outlets

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Neill Robson

Full name: Neill Robson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Karen Robson

Full name: Karen Robson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Jodie Rorke

Full name: Jodie Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. We have first hand experience of this. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need to travel by car and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too hilly) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce Exmo_20 from local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Andrea Gay Rorke

Full name: Andrea Gay Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Revert to Exmo _20b as previously proposed,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure transparency and correct procedures.

Full name: Andrea Gay Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heath (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging lhabitat. Allocating Exmo_20 is contrary to the HELAA,the Site Selection Methodoligy & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would destroy the “the tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the LOCAL PLAN. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified downstream flood risk along Withycombe

Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach, etc.) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

Exmo_20 would have significant adverse effects on St. John In The Wilderness Grade II listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02..

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: * Remove Exmo_20 from the Local Plan. * Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure transparency.

Full name: Andrea Gay Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Joe Rorke

Full name: Joe Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Nicholas Rorke

Full name: Nicholas Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This site would cause harm to the Pebblebed Heathlands (SAC/SPA). Developing this site is contrary to POLICY PBO1 of the local plan and with the mitigation strategy. Exmo_20 would be very detrimental to the 'tranquillity, wildness and darkness of night skies' of the countryside which is contrary to POLICY OLO1. Developing this site (Exmo_20) would break up and isolate wildlife habitats and destroy corridors, all of which are contrary to PARAGRAPH 13.9 of the local plan. It would harm irreplaceable habitats, ancient trees and hedgerows which act as natural corridors for wildlife and which are rich in a variety of species, contrary to PARAGRAPH 13.9. The habitat regulations assessment (30.01.25) confirms that there is 'currently not sufficient certainty to rule out adverse effects in integrity to.....air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OLO9 and POLICY PBO4. Development of Exmo_20 would have a detrimental effect on St. Johns In The Wilderness Grade II listed church and churchyard, and spoiling the peaceful setting for worship, contrary to POLICY HE02. Exmo_20 would increase the water run-off through the natural stream and from a heavy clay soil, increasing the flood risk of the already identified in Withycombe contrary to POLICY AR01B. The proposed site of Exmo_20 would increase vehicle travel beyond the 800m to key services and facilities, contrary to POLICY TR01. The main access point to Exmo_20 is closer to Budleigh Salterton than to Exmouth. The services and infrastructure of Budleigh Salterton would put under a greater strain than unfair strain that has not been properly considered. This would be contrary to POLICY OL05 of the LOCAL PLAN as it would lead to a blending together of the two discrete towns.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan, or at the very least reduce its scale. Do not have vehicle access via the B3179. Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a stakeholder I am anxious to see the democratic system, with all its transparency, in action.

Full name: Andrea Gay Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo 20 is against paragraph 11.6 because it is further than 800 metres from any services and facilities making it unsuitable for people to walk.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Only build on the very southern section of the site (20_b, or remove the allocation of this site as it is in conflict with the paragraph 11.6.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure a transparent and correct adherence to the stated policies.

Anne Rose

Full name: Anne Rose

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to register my objection to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. The old railway line is a well used cycle and footpath that enables Exmouth and Budleigh residents to exercise in a rural environment. We have also noted a number of disabled people using the path with their mobility scooters.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

We hope you will reconsider these building plans.

Michael Rosser

Full name: Michael Rosser

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase traffic congestion conflicting with paragraph 11.2. People would need to travel more than 800 metres to existing services contrary to paragraph 11.6.. It would conflict with the Strategic Nature Area 368 - contrary to paragraph 13.23 of the local plan. It would cause harm to wildlife biodiversity, trees and hedgerows, contrary to paragraph 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Helen Mary Roulson

Full name: Helen Mary Roulson

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Regular storms affect out public transport links already. The road between Sidbury and Sidford floods regularly with heavy downpours and gets cancelled. Improvements need to be made at flash points. Rail services appear to be fragile in the face of storms. Much improved maintenance of trees need to be proactively maintained rather than reactive and paused servies.

Full name: Helen Mary Roulson

Proposal: 16. Community Facilities

1. To which part of the Community Facilities chapter does your representation relate?: Policy

1(a). Please write down the paragraph or policy number that your representation relates to.: CF01

3. Do you consider that this part of the Community Facilities chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Community Facilities chapter is not sound. Please be as precise as possible.: Surgeries unable to recruit GP's. Dental practices going private reducing NHS places. Bring back dentists in schools to protect children's oral health. We know that existing communities already struggle to provide ample GP appointments across the area. I know that the Honiton and Ottery surgeries have even struggled to recruit, even in these amazing locations. How does the council propose to meet the growing needs of 1000's of additional people with the new builds. Add NHS dental no go zones.

Full name: Helen Mary Roulson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: We need large open spaces big enough for kicking a football around, like the size of Honiton Bottom Road park

Full name: Helen Mary Roulson

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Housing needs are huge in this area. I work in residential lettings through Stags and the need for affordable housing is huge with several families after every property. If families have pets or children it's becoming harder and i don't think the Landlords reform will do enough to help in any great detail. Homes in a road need to be mixed between apartments/bungalows for older residents, a mix of 2,3 and 4 bedroom houses for families and a collection of max 3 storey blocks of flats. 40% should be for people that live within 60 miles/1 hour travel of the target area. 30% should be for key workers within 1 hour of their work base. 20% should be for those under 35 from the local area relocating from a 1 hour radius. The remaining 10% should be for economic legal immigrants, genuine asylum seekers fleeing violence and short term apartments for the homeless to restart their homing needs (6 mths)

Full name: Helen Mary Roulson

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: Please can we consider rain water collection for new builds to be used in toilet flushing. Also instead of tarmac or concrete drives, please use water permeable surfaces to reduce run off and flash flooding.

Sue Roundhill

Full name: Sue Roundhill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: If there are many more houses built in Ottery St Mary the infrastructure will be at breaking point. We haven't the facilities and the roads in the centre of town are already getting blocked. The Doctor's Surgery is overwhelmed and it is almost impossible to get an appointment to see a doctor. The schools are overcrowded and will find it difficult to accommodate extra pupils. The lack of parking around The King's School is getting out of hand. More and more pupils are parking their cars round Thorne Farm Way. As the year goes on more pass their driving test & the roads become crowded with cars. When the school day has finished the roads round Thorne Farm become clogged with cars picking up their children. We avoid trying to leave the estate at these times.

The infrastructure of Ottery must be improved before too many more houses are built.

Daphne Rowe

Full name: Daphne Rowe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20: Although the plan mentions Exmouth, this new development is much nearer to Budleigh Salterton. I am completely against this large amount of houses producing more than 1,400 people plus many cars - possibly two per household - and of course many children. There is one school in Budleigh - full. One Doctor's surgery and it incredibly hard to get an appointment at the best of times, let alone if there are many extra people. The B3179 road is narrow, winding and as are other roads in the area, and not suitable for extra traffic. Parking in Budleigh is hard to find and there are not many buses. I spoke to some shop owners who are not keen on the proposals and say it won't make much difference to their businesses. So many people shop on line, go to Tesco and Lidl and don't use local shops at all. I want to know how many 'affordable' houses are in the proposal - we need cheaper houses and not just the expensive properties. There is already a large housing area at Goodmores Farm on the edge of Exmouth, leading onto small roads. What about infrastructure??

Peter Rowntree

Full name: Peter Rowntree

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The scale of the development is disproportionate to the countryside setting. It will have a significantly detrimental impact on wildlife & the countryside, especially the aspect of wildlife corridors & movement. Increased car usage because of the isolated location, again detrimental to wildlife (& humans). Budleigh Salterton has insufficient capacity of key services to accommodate such a large development & it will merge Exmouth into Budleigh Salterton to the detriment of both towns & their residents. Policies OL01, OL05, & paragraphs 11.2, 11.6 & 13.23.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20b would seem to be far more suitable, if developments are mandatory?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Paul Rowsel

Full name: Paul Rowsel

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To remove Exmo20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: so we get to air our views

Jacqueline Jane Ruhlig

Full name: Jacqueline Jane Ruhlig

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Main access point of Exmo _20 significantly closer to Budleigh than Exmouth, making Budleigh its most convenient and accessible town. Services & infrastructure of Budleigh would be the preferred choice for residents of Exmo _20. Would lead to the merging together of Budleigh & Exmouth, contrary to Policy OLO5 of the local plan. Exmo _20 would cause harm to the heritage assets, most significantly St John in the Wilnernesss Grade 11 listed church & churchyard, drastically changing the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. EXMO-20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OLO1.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce size of EXMO-20 or REMOVE it from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Daniel Rundle

Full name: Daniel Rundle

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Feniton residents.

- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring members of the public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport. The buses are few and far between and the rail services have been reduced over the years and neither option is a reliable way to commute.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic. They are not safe at the moment for pedestrians, cyclist or horse riders and would become more dangerous with more larger vehicles entering the village.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.

- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.

- Proposed development in Feniton is not ‘limited’ but huge for a tier 4 village.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. The blind bends on either end of this lane are especially dangerous.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC’s Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Lisa Rundle

Full name: Lisa Rundle

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section. However I am concerned that a petition that was signed by 500+ residents, emails and comments have been ignored and not reported by EDDC to the strategic planning committee. Why have the views of people living local to Feniton been ignored? It appears EDDC prefer using the Common Place System as it is complex and time consuming puts people off from having their say. I think this is extremely discriminatory and undemocratic and goes against British Values.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wonder if the members of EDDC who are proposing the extra housing and industrial estate have visited Feniton and travelled along the roads to get to the proposed sites. I cannot imagine that they have because they would see Feniton is unsuitable for a higher volume of traffic, especially large industrial vehicles.

We are very grateful that the flood alleviation scheme has been supported and the work is nearly complete to stop homes from flooding. It is well documented that Feniton floods regularly. Access to my previous home in Feniton Gardens was often restricted because of flood. I was very fortunate that my home was never flooded but my neighbours were not so lucky. The roads are often impassable when we have heavy rain

and although the flood alleviation will stop home being flooded, the water is directed to the roads so they will flood more. This means for periods of time access in and out of Feniton will be impossible. The flood alleviation does not mean the village is safe from flooding. We were told by the scheme manager that this scheme is to prevent the current homes from flooding. Adding more homes to Feniton will take more green space where flood water can be absorbed, increasing the risk of flooding to homes. It is also well documented that sewage is a problem in Feniton. When we have heavy rain, the system is unable to cope and homes have become flooded with raw sewage. There is also the issue of lack of sustainability. At the 2014 Super Enquiry, the planning inspector determined, the EDDC agreeing, that Feniton was not a sustainable location of further development. I am unclear what has changed since that decision in 2014. The primary and secondary schools are still full. If all of these homes are built in Feniton, the local primary school does not have capacity for the children these homes will bring. This will be a cost to the council of bussing these children to another school. The roads in and out of Feniton are narrow. During the flood alleviation work the main road to Pattersons Cross was closed and it caused a great deal of congestion in and out of the village through the other routes. Our roads are not wide enough to deal with extra traffic, especially if that traffic is lorries that an industrial estate might bring. The doctor's surgeries are also full. People are unable to access an NHS dentist. There is a lack of public transport and the trains are stopping less frequently in Feniton since 2014. I feel that a disproportionate number of houses has been suggested for Feniton compared to other villages. Feniton is certainly not able to accommodate an industrial estate. The proposed industrial estate is in an unsafe location. Green Lane has no pavements but is a well walked part of the village and provides residents with access to fields for dog walking and enjoying the countryside. To put an industrial estate off this road will bring danger to pedestrians due to the lack of pavement, the pinch points, blind bends and single tracks. The industrial estate does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton. I live in Feniton because it is a safe and quiet place to raise my children. We have enjoyed access to walks around the village and through the fields. Feniton is a wonderful place to live with fantastic community spirit. I wanted to live in a village, not a town. If I wanted to have access to an industrial estate and be surrounded with houses then I would have moved elsewhere. Please stop destroying villages and taking choice away.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a

sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08. Removal of Otry_20 from the draft local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Helena Ryan

Full name: Helena Ryan

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Further to this, the "Development would be expected to play its role in delivering part of the Sidbury to Sidmouth cycle route through the allocation". The one person in favour of this development was from the Sidmouth Cycling Campaign, who although they want a cycle route, pointed out the current plan of having the multi-use path coming from the site onto Ebdon Lane in order to connect to the phase 1 cycle route, is considerably steeper, approximately a 15% gradient, than the absolute maximum gradient of 8% specified in LTN 1/20. Even ignoring the steepness of the road, the exit from the phase one route onto Ebdon lane would take cyclists downhill on a blind corner on a single lane road, that although not busy all day every day, certainly has busy periods with farm vehicles so big they take up the entire width of the lane, repeatedly driving up and down it. How anyone taking toddlers in a cargo bike or families with small children on their own bikes, for example, could be expected to use this route is beyond me.

The Sidmouth Cycling Campaign also pointed out that the height differential from the site down to the road for the proposed footpath is also steep and impractical, bearing in mind the need to accommodate disabled people. They then suggested a location further up Ebdon Lane. As far as I can see, there is no location along Ebdon Lane where the height difference would make a suitable footpath exit/entrance, and in any case would mean anyone in a wheelchair having to push their way up the hill to it, or hold back their wheelchair in order to safely come down it to the A375.

Regarding both Phase one of the Sidmouth cycle route (SD06) Land west of Two Bridges (sidm_06a) Sidford, and phase two, SD26 Development Allocation at Sidbury. LTN 1/20 guidelines say that cycle route designs should be inclusive - from eight to eighty and

beyond, and be accessible, catering for the broadest range of people and abilities. Clearly, this is not possible if any part of the route includes Ebdon Lane, at least as far as what is currently proposed.

The guidelines also state that cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles. Neither phase one nor phase two adhere to this.

LTN/1/20 4.2.9 further suggests that, "Not only must cycle infrastructure be safe, it should also be perceived to be safe so that more people feel able to cycle". I have been told that some parents are wary of allowing their children to use the Sidford to Sidbury cycle route due to it running across the middle of two or three fields with no buildings overlooking it and not easily visible from the road. This would be even more problematic in winter due to poor or little light, and made worse again when there is no easy access to the route except from either end at Hillside/Ebdon Lane or Ottery Lane. The worry is not just stranger danger, but also of accidents.

Also from LTN/1/20 4/2/12 - "Cycle routes remote from roads may have other risks relating to crime and personal security. The risk of crime can be reduced through the removal of hiding places along a route, by providing frequent access points, lighting, and by passive surveillance from overlooking buildings and other users".

Sustrans, a UK-based charity and custodian of the National cycle Network, suggests that, "National funding should ensure any proposed local schemes include a safety audit and address personal safety". They go on to say, "Good levels of visibility along routes through clear sightlines, avoiding blind corners, and lighting which is provided at a human-scale, which makes it easy to recognise people and does not result in long shadows, rather than reliance on tall streetlights provided for highways." Is any of this being considered, especially for the phase one Sidford to Sidbury part of the route? Has a safety evaluation including looking at personal safety been carried out?

I believe the council is in danger of creating a white elephant that will largely be used by mountain bike and gravel bike riders. A site visit is a necessity as looking at photographs or a map do not give a clear impression of the steepness of the hills here in Sidbury, or how dangerous the terrain might be for personal safety. Visit steep, busy roads like Hillside, when people are pulling out of driveways onto the narrow road to go off to work,

so you can see how dangerous it would be if children using the road to reach the cycle path at the same time were added into the mix, or at the other end of the day when people are returning from work and children would be returning from after school activities.

A safe, level cycle route would be fantastic to have, but the only way I can see it working here would be for it to run along as close to the A375 as possible. Put it behind a hedge, keep the hedges cut low so the cycle route is visible or perhaps create an elevated cycle path, but don't waste money on a plan that is only usable by a small percentage of the population.

Kind regards

Helena Ryan

Full name: Helena Ryan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD26

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic Policy SD26 Development Allocation at Sidbury.

Sidbury falls wholly within an AONB. Government planning guidance recommends that 'major development' on AONB land should only happen under exceptional circumstances and only when it can be demonstrated that it is in the public interest. Where is this demonstration that it is in the public interest? All but one person responding to the outline planning permission for this site, have been against it. This would see to demonstrate that it is definitely not in the public interest of those living in the village and who will have to put up with the extra traffic on a narrow and already overburdened road. And it is especially not in the interest of those whose properties will be overlooked and overshadowed by it. Also, as a local authority you are supposed to "Make sure any proposals seek to further the purpose of conserving and enhancing the beauty of the AONB". Clearly, ripping out ancient hedgerows and building over pasture land is not going to further or conserve the beauty of this site. Developments that have been allowed in the village over the past 30 years or so, have all been hidden around the back of the main thoroughfare, presumably in order to avoid this issue.

Further to this, the "Development would be expected to play its role in delivering part of the Sidbury to Sidmouth cycle route through the allocation". The one person in favour of this development was from the Sidmouth Cycling Campaign, who although they want a cycle route, pointed out the current plan of having the multi-use path coming from the site onto Ebdon Lane in order to connect to the phase 1 cycle route, is considerably steeper, approximately a 15% gradient, than the absolute maximum gradient of 8% specified in LTN 1/20. Even ignoring the steepness of the road, the exit from the phase one route onto Ebdon lane would take cyclists downhill on a blind corner on a single

lane road, that although not busy all day every day, certainly has busy periods with farm vehicles so big they take up the entire width of the lane, repeatedly driving up and down it. How anyone taking toddlers in a cargo bike or families with small children on their own bikes, for example, could be expected to use this route is beyond me.

Dr Rick Rylance

Full name: Dr Rick Rylance

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I'm writing to you direct as I find the formal website unnecessarily restrictive, complicated and difficult to manage, as do several other potential respondents. You should consider this in any future iterations. Convenience of processing at your end is not a good reason to over-control responses. I am concerned about the impact of proposed housing developments on Seaton, where I live, and its immediate natural environment which I treasure and use extensively.

- I note no housing needs assessment has been undertaken in Seaton and that the current plan appears to be driven by formula rather than evidence of need or impact. I note there are currently a considerable number of properties for sale locally and that there are extensive building projects underway.
- I am concerned that no thorough survey had been done of the availability of brown field or repurposed sites which might be used for additional residential accommodation rather than green field developments.
- I am concerned about the impact on local services of sharp increases in local population including in the provision of health care, transport, and education.
- I am concerned about the impact on traffic flows has not been sufficiently assessed in the context of increasing congestion on narrow country lanes especially in the summer with heavy use of large tourist vehicles.
- I am concerned about the impact on what is already a rather run-down town centre of developing out-of-town retail units.
- Most importantly, I am concerned about the impact on the local natural environment which is the single most important aspect of living in rural Devon and

which will be damaged by steadily increasing housing. No sensible person would believe that any development suggested here will be the last. Others will follow as they always do when precedent is set. If these developments go ahead, developers' interests will prevail over those of residents, and their profits and convenience over quality of life and environment. Finally, it is worth saying that the current proposals conflict with, or potentially conflict with, existing policies on, for example, Green Wedges, Landscape, housing, communities, town centres, and flood planning, as well as statement on the importance of the natural environment and its benefits for the community and individual health and quality of life. This is strategically incoherent.

Giles Sadler

Full name: Giles Sadler

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE11

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: I support this policy and believe it to be legally compliant

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: I support the adoption of this policy but with some additional specific policy detail to help avert misinterpretation and unforeseen consequences.

The following suggestions for amendments and additions to the draft text are based on the experience of local residents of Salcombe Regis where the current owners of the Camping & Caravan park have utilised loopholes in planning policies to avoid proper public scrutiny of a full planning application. These includes the use of ‘variation’ applications to historic planning permissions and the use of Section 73 Applications to remove historic conditions that would result in fundamental changes to the way the site operates and impact on the amenity of the local community and historic environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Suggested addition to second Introductory paragraph to deter proposals that challenge or undermine policies designed to protect sensitive and historic landscapes:

"Proposals for the extension of, or related and ancillary facilities on, existing sites will be permitted provided they align with all relevant policies and existing designations and meet the following criteria in full:"

Suggested additional text to follow criteria A to prevent trend of converting grass camping pitches to hardstanding touring pitches and then to permanent static caravans and lodges: "A.1: No re-designation of camping pitches to touring pitches or of touring pitches to permanent pitches are to be provided; To address the creep of open amenity space lost to hard standings and permanent structures" "A.2: No reduction of on-site green spaces or recreational amenities is to be provided;"

Suggested amendment to wording of criteria C to acknowledge the impact can be wider than just the adjoining residents (e.g. traffic congestion, light pollution).

C. The proposal would not have an adverse impact on local character or the amenities of the local community;

Suggested new criteria 'F'. In the case of Salcombe Regis Campsite - the applicant has used a section 73 variation application that would remove the condition on historic planning permission that prevents winter occupation of the site. The removal of the condition would result in the site's status changing from seasonal (closed over winter months) to all-season which would be a fundamental change in the way the site operates and have a significant impact on the amenity of the local community and the historic environment.

"F. If the proposal would result in a significant change to the way the site currently operates full planning permission will be required."

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Lin Salter

Full name: Lin Salter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. This shared path is a wonderful amenity and was originally constructed as Councils had to provide cycle paths, but now you don't care about it or its users.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Heather Sanham

Full name: Heather Sanham

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The emerging Local Plan states that it aims to preserve and enhance the distinctive qualities of East Devon's glorious thriving natural environment; that it is underpinned by principles that seek to protect our outstanding landscapes and wildlife...that it will ensure that there is greater care of the natural world with biodiversity improvements, etc; and that EDDC will work with partner bodies to secure new expanded and improved physical, social and community facilities and infrastructure delivered alongside development.

But for Seaton, the emerging Plan is proposing new development sites on the town's Green Wedges which not only ensure that the principles of the Plan in respect of the natural environment cannot be delivered in Seaton, they are also directly in conflict with the following policies:

- Policy OL05: Green wedges Within green wedges..... development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.

- Strategic Policy OL01: Landscape features East Devon's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute to the character of East Devon's landscapes, in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located.
- Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty) The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon: Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant). Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest;
- Strategic Policy PB01: International followed by nationally designated wildlife sites are of greatest importance and must be given upper most protection.
- Policy PB02: Protection of regionally and locally important wildlife sites
- Policy PB03: Protection of irreplaceable habitats and important features Development proposals which would result in the destruction or degradation of irreplaceable habitats will be refused unless
- Strategic Policy PB04: Habitats Regulations Assessment

- Nutrient neutrality in the River Axe SAC catchment. East Devon District Council requires development proposals within the River Axe SAC catchment to demonstrate how nutrient neutrality will be achieved.

- Protection of Beer Quarry Cave SAC bat pinch points between Seaton and Colyford, and between Colyford and Colyton. In order to protect the pinch points and secure their long-term suitability for the SAC bat species, the council will not support any applications which reduce the quality or functionality of the bat foraging and commuting habitats within these pinch points, such as through hedgerow\tree loss and adverse impacts from lighting.

Therefore for all the above reasons, I believe that proposed sites Seat_02, Seat_03, Seat_05 and Seat_09 should be removed from the emerging Plan

Further policies within the emerging Plan which are inaccurate are :

- Transport TR01 Exmouth, Honiton, Seaton, and Ottery St Mary have bespoke bus services, with several high-frequency routes linking East Devon settlements to Exeter. Seaton's bus services have declined considerably over the last few years making it difficult - and in some cases impossible - to travel to other towns for work.
- Policy OL10: Development on high quality agricultural land This policy restricts development on the best and most versatile agricultural land (Grades 1, 2, and 3a) unless there is an overriding need and no suitable lower-grade land is available.

EDDC's commitment to Seaton in the emerging Plan is much reduced compared to its commitment in the current adopted Plan which seeks to support the town's economy, building its reputation as a destination for green tourism:

1) HOUSING

- Strategy 25 - The adopted Plan (2013 – 2031) stated that any further significant housing developments beyond the build-up area boundary would be restricted by locating the majority of the required 150 within the existing town. But the emerging Plan not only states that “The population and range of community facilities and services in Seaton make it an appropriate place to locate a relatively large amount of housing and employment development” it now proposes significant housing in the Green Wedge.

In the time since the current Plan was adopted and now, Seaton has delivered more houses than allocated whilst its infrastructure and facilities have reduced.

Therefore the proposal to allocate further land for housing is unsustainable, and to do so in the town's Green Wedges is against EDDC's own vision and policies relating to protection of the natural environment.

I therefore do not support the inclusion of sites Seat_02, Seat_03, Seat_05 or Seat_09 in the emerging Plan for future development.

2) COMMUNITY FACILITIES

- The adopted Plan in 2013, stated: “community facilities, school, health, social and cultural, are seen as borderline or inadequate with no capacity to serve additional residents”.
- Despite those facilities having reduced further since 2013, in 2025 the emerging Plan now states that “Seaton has a wide range of community facilities, with a variety of shops, sports facilities, a library, GP, hospital, and regular bus service around the settlement and to areas elsewhere”.

The emerging Plan statement that Seaton has a wide range of community facilities is incorrect. The town cannot support an increase in population; doctors and dentists are at capacity; the hospital has lost facilities; bus services have been reduced; community facilities at Colyford Road have been demolished. The inclusion of Seat_02, Seat_03, Seat_05 and Seat_09 for future development is therefore unsustainable.

3) TOWN CENTRE

The adopted Plan stated in 2013 that “priority will be given to the enhancement of the environment and the promotion of business opportunities within the Town Centre to improve the attraction of the town for residents, visitors and businesses.”

This statement has been removed from the emerging Plan but needs to be restored to meet the emerging Plan's commitment to "preserve and enhance the distinctive qualities of East Devon's glorious thriving natural environment", and to "promote business opportunities within the Town Centre to improve the attraction of the for residents, visitors and businesses", all of which are essential to secure the town's future economy.

4) NATURAL ENVIRONMENT

- The adopted Plan states “Seaton's outstanding natural environment especially its Wetlands is its most precious and defining asset, and policies for the conservation, enhancement and sensitive management of the landscape, heritage and wildlife of the area will be prominent. The Axe Wetlands, Dorset and East Devon Coast World Heritage Site (Jurassic Coast) and surrounding exceptional coastline will be key environmental assets that will be integral to the future success of the town.”
- The emerging Plan no longer commits to policies for the conservation, enhancement and sensitive management of the landscape for Seaton and simply states: “Seaton is set within a stunning natural environment with the coast to the south (including the Jurassic Coast World Heritage Site), Seaton Wetlands along the eastern boundary, and the East Devon AONB located beyond to the east. Two scheduled monuments in close proximity indicate the high historic value in the area, along with a conservation area and several listed buildings in and around the town centre.”

Again, despite the statement that the emerging Plan will "preserve and enhance the distinctive qualities of East Devon's glorious thriving natural environment", in respect of Seaton EDDC's previous commitment to protect, conserve and enhance the town's unique natural environment has been removed in the emerging Plan. This should be reinstated. In order to deliver on the Plan's commitment to preserve and enhance the distinctive qualities of East Devon's glorious thriving natural environment... its principles that seek to protect our outstanding landscapes and wildlife...ensure that there is greater care of the natural world with biodiversity improvements, etc, I believe that the following amendments need to be made:

- In respect of the Seaton/Colyford Green Wedge, the land which has been designated for employment/recreational use but has remained undeveloped for over 25 years should have the designation removed. All land north and east of the Harepath Road industrial site which is ear marked for employment or housing in the emerging Plan should be re-designated Green Wedge.
- The Seaton/Beer Green Wedge should be extended to include the land between the built up area boundary and parish boundary to preserve Seaton's distinctive topography.

Only then can the town's unique natural environment be protected, conserved and enhanced; can flooding of the surrounding housing and Wetlands in which EDDC have made considerable investment be averted; can the town's future economy based on Natural Seaton be supported; and the town's infrastructure be sustainable and meet the needs of its current population.

5) FUTURE DEVELOPMENT

- The adopted Plan states: The Future: We will Restrict any further significant housing developments beyond the existing Built-up Area boundary Ensure that the integrity of the European wildlife and habitats sites adjoining and near the town are not compromised..... Extending the network of green links within the settlement and to surrounding countryside and settlements

Seaton will be supported in its role as an important visitor destination on the East Devon Coast, with the onus placed on conservation and enhancement of the surrounding natural environment. There will be limited housing development in the short term beyond that already proposed in the regeneration area. Note - housing in the regeneration area is still to be completed along with development at Fossey Court and the Hook & Parrot on the town's seafront.

- In contrast the emerging Local Plan states: The population and range of community facilities and services in Seaton make it an appropriate place to locate a relatively large amount of housing and employment development. But then goes on to say: The amount of development should be limited to an extent, as new residents will need to travel elsewhere to access some strategic facilities which are lacking in Seaton (train station, secondary school, swimming pool).....The environmental constraints around Seaton also limit its growth, with the River Axe and associated flood zone to the east, AONB also to the east, a rising landscape to the west, and sea to south, all limiting the realistic options for future development.

So whilst first stating in the emerging Plan that Seaton is an appropriate place to locate a relatively large amount of housing and employment development, it goes on to acknowledge that development should be limited with environmental constraints also limiting the town's growth. As previously stated, infrastructure has decreased since the adopted Local Plan; housing has exceeded that required in the adopted Plan with more still to be completed; and any additional housing will compromise the integrity of wildlife and habitat sites and is likely to lead to flooding of surrounding housing and the Wetlands. Therefore proposed development sites Seat_02, Seat_03, Seat_05 and Seat_09 should be removed from the emerging Plan.,

6) FLOODING

Seaton has increasingly experienced flooding east of Harepath Road and at Seaton Wetlands Nature Reserve. Any development on the Green Wedge would inevitably result in further flooding of the Reserve and would put its future as a significant tourist attraction at considerable risk.

Additional flooding risk comes from Stafford Brook which no longer follows its natural, low-lying route through its flood plain to the main river, and in places the water level in the Brook is now above the ground level of its flood plain at Stafford Marsh.

Any increase to the flow of water into the Brook, no matter how small, increases the risk of flooding at Seaton Wetlands, and will therefore impact on visitors to this National Nature Reserve and to users of the Stop Line Way (National Cycle Route 33) that passes through it.

This is further reason why the Green Wedges should be protected from development and extended to prevent flooding of the Wetlands. Because of the risk of surface water flooding, it has become critical that Seat_02, Seat_03, Seat_05 and Seat_09 as well as the newly proposed Seat_13a to the west of Axe View Road, are also included within the Green wedges and that the emerging Plan is amended to ensure future protection of this important site.

7) SOCIAL HOUSING

An area that could be used to provide housing for the town is the site at Seat_06 Former Depot, Colyford Road, Seaton, EX12 2DQ which is close to all amenities and within the town's built up area boundary. It was made derelict in 2013 with the intention of delivering work units. Loss of employment space is given as the reason for not allocating this land for housing but the case has never been made for more work units in Seaton with those at Riverside Workshops largely used for storage.

The emerging Local Plan states that a section of Seaton Marshes Local Nature Reserve is within the northern boundary of site Seat_06 but that is incorrect and this statement needs amending. To give it protection from development claiming that it is part of the Nature Reserve is false.

In short, the proposals in the emerging Plan are significant in respect of the town's Green Wedges and, if the Plan is approved, are likely to lead to uncontrolled building which will no longer provide protection, enhancement and conservation of Seaton's unique natural environment and will threaten the town's future economy based on Natural Seaton. It will lead to flooding of surrounding homes and of the Wetlands; to loss of biodiversity and rare wildlife; loss of prime agricultural land; would result in coalescence of the settlements of Seaton and Colyford; and would change the character of this area from open rural to virtually continuous urbanised. As the Planning Inspector stated in upholding refusal of development at Harepath Road when it last came forward for development, "the housing shortfall although significant is - arguably - relatively short term, whereas the erosion of separation between Colyford and Seaton would be permanent".

The proposals in the emerging Plan are unsustainable. Seaton's doctors, dentists and hospital facilities which have been much reduced over the last few years, are already struggling. They also serve the residents of surrounding towns and villages where further additional homes are being proposed. A development of over 70 new homes at Colyton is currently being built with another large site planned. Our infrastructure is insufficient for any new developments, in Seaton or outside.

To preserve Seaton's way of life and future, and to deliver on the emerging Plan's vision, now is the time for the site Seat_05 (Harepath Road), which for over 25 years has been allocated for mixed use employment/recreation, to be removed from the emerging Plan altogether and returned to Green Wedge so that the town can build on all the work that has been put in during that time into developing Seaton as a destination for green tourism. This land has remained undeveloped for years because without housing to support it, it is not viable. Removal of this site would also ensure that any future retail/employment is based close to the town centre to support the town centre and therefore meet Strategy SE06 which says: Tier two towns (Seaton) form focal points of activity in East Devon towns and will be the preferred location for the development of new retail, leisure and other uses that attract and are used by people for commercial or community activities....."Development proposals that would result in the loss of existing local shops and services will be resisted where it would result in the significant or absolute loss of that facility to the community." Town centre shops have almost unanimously expressed their concern at the prospect of out of town shopping facilities at Harepath Road and many believe their businesses won't survive if such development were to go ahead. This is borne out by the statement to them that Tesco would bring shoppers to the town centre, but that never happened - people shop at the store and go home. It's also borne out by significant evidence from SavetheHighStreet.org as well as

acknowledged by the developer currently proposing retail warehouses at Harepath Road, that their development would have an adverse affect on Seaton town centre shops.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: So, as evidenced above, unless sites Seat_02, Seat_03, Seat_05 and Seat_09 are removed from the emerging Local Plan then EDDC's vision for and commitment to East Devon remains only aspirational for Seaton and can never be delivered for the town.

Mr and Mrs Satterly

Full name: Mr and Mrs Satterly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors, contrary to paragraph 13.23 of the Local Plan. As well as causing harm to irreplaceable habitats, veteran trees and species rich hedgerows contrary to paragraph 13.9.

The heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth (already under pressure from climate change) which conflicts with policy AR01B.

In addition, the Exmo_20 development would increase the need for car travel, contrary to Figure 7 and conflict with paragraph 11.2 The isolated location would mean residents would need to travel much further than 800m to existing key services and facilities which is contrary to paragraph 11.6. The location is also too far and too steep from any town centre to use walking or cycling as a main choice of transport for most people which is contrary to policy TR01.

I also believe that with the almost 200 houses currently being built up the road from this proposed site (Exmo_20) at the new Goodmores development, Exmouth does not have the jobs, dentists, GPs or school spaces to support an additional 700 households. Buses and trains to Exeter are frequently delayed or full and the roads are busy and not well maintained (potholes) due to the constant use. Add to this the additional pressures from students visiting from the language schools and Sandy Bay from spring -

summer, that is a lot of people in a town that is already buckling under inadequate sewage infrastructure with regular raw sewage leaks and problems with drainage.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

To remove the Exmo_20 site from the Local Plan altogether. Alternatively, reducing the size of Exmo_20 and removing the access to the site via Southern Wood would reduce some of the issues above, but not solve them.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sandra C Satterly

Full name: Sandra C Satterly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: the main access point of Exmo_20 is significantly closer to Budleigh Salterton than it is to Exmouth thus making Budleigh Salterton the most convenient and accessible town. The services and infrastructure of Budleigh Salterton (the High Street, Doctors, School, beach etc) would be the preferred choice for residents of Expo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh salter ton & Exmouth, contrary to POLICY OL05 of the local Plan.

An alternative site to Exmou_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebeds Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is country to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in Integrity in relation to ...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via Southern Wood.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Nigel Savery

Full name: Nigel Savery

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 and its development is contrary to * Policy PB01 and is not in accordance with the mitigation strategy. Exmo_20 should be located on an alternative site so there is less harm to the pebbled heaths. Exmo_20 would harm the wilderness, dark skies and peacefulness of the area which is contrary to *Policy OL01. EXmo_20 would destroy wildlife habitats and their corridors contrary to Paragraph 13.23. it would kill habitats, trees, heather, never to be seen or replaced again so is contrary to *Paragraph 13.9. *The habitats regulations assessment of 30.01.25 confirms that there is currently not sufficient certainty to *RULE OUT adverse effects in integrity in relation to the air quality regarding the Devon pebbled heath *SAC/SPA. Exmo_20 and it is in conflict with Policy OL09 and *Policy PB04. EXmo_20 would have adverse effect on Grade 11 listed St John's church which is a peaceful place of worship and its setting this is contrary to *Policy HE02. Exmo_20 is a catchment area of rainwater for Exmouth and most of the Withycombe brook. Exmo_20 would be built on heavy claymaking soakaways ineffective therefore allowing water to flow and possibly flood which is in conflict with *Policy AR01B. Exmo_20 would cause more traffic in an already congested area with bad road access to Exmouth and Budleigh, Access to the site will not work and would need rethinking. to suggest people will ride or walk into town is a joke, people use cars. contrary to *Policy TR01. Not enough Shops, need a large supermarket to rival Tesco. not enough Doctors, Schools the area would be over run, which is contrary to *Policy OL05.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Anthony Sayers

Full name: Anthony Sayers

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Main access point much closer to Budleigh than Exmouth. This would lead to coalescence of Budleigh and Exmouth contrary to Policy OL05 of the LP. EXMO-20 would cause harm to nearby heritage sites contrary to Policy HE02. A detrimental effect on the open countryside contrary to policy OL01. EXMO-20 would increase traffic congestion, contrary to policy TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO-20 from the local plan. Do not access site from the already very busy B3179. Revert to EXMO-20b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Melanie Schwarzin

Full name: Melanie Schwarzin

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To whom it may concern

I write to you today as a very concerned resident of Broadclyst Village. I have been living in the village since 2011 and i am extremely worried about the pending development at the Winter Gardens .

The village is situated in a very small historic location and I am horrified that this location has been put forward for potential development.

And here are my reasons....

The whole site and surrounding area is susceptible to immense flooding which already causes many problems and angst to the residents of the village trying to navigate their day today living. (please see photographic evidence provided)

The number of houses proposed will be extremely detrimental to an over stretch infrastructure . The Doctors surgery is not able to cope with the amount of people in the village already (some of the residents are very elderly are heavily reliant on this service and struggle to get an appointment) The schools are full and residents are having to send their children else where outside the village .

The situation of the proposed site is surrounded by small country lanes with no pavements which is already extremely hazardous for the residents to navigate especially small children walking to school. And the lanes are used by disabled residents in mobility scooters, cyclists, horse riders, dog walkers and farm machinery and delivery vans making it ALREADY difficult to access and get around particularly around Dog Village which is a bottle neck nightmare .

There has already been planning passed for 15 houses (23/1537/MOUT) which is already going to be difficult for a weak infrastructure to cope with .

SEWAGE SEWAGE SEWAGE !!!

I would also like to inform you that our sewage is up to max capacity with lorries pumping sewage out regularly and not coping at all !

The sewage problem will only be exacerbated . SEWAGE mixing with FLOODWATER will be a monumental environment disaster for the community .

I implore you to give very careful consideration to not pass this plan as this village is already struggling to survive as it is.

The points i have raised are very valuable points indeed and our elderly residents and parents of young children are seriously frightened and anxious and peoples mental health is being compromised !

Sam Scotcher

Full name: Sam Scotcher

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Whim_08 site is on a scale of development incompatible with spatial strategy. Furthermore, the site lacks safe and convenient pedestrian access to services and facilities in the village. The site also forms part of the 'Green Wedge' between Whimble and Cranbrook. This land forms an important part of the very attractive rural landscape setting for the settlement. It is also highly likely to have a negative impact on wildlife. Of great concern is the risk of flooding, and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation. The decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made to partially allocate the site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As the decision to allocate Whim_08a was made without solid evidence provided by the Planning Officers report and recommendations, I do not believe that any modifications can make this a sound plan. Therefore, it should be removed from the EDDC Emerging Local Plan and the homes should be allocated elsewhere in the district (outside of Whimble Village), where there is appropriate infrastructure. It is my view that further work should be

carried out on all of the sites by the professional Planning Officers before any allocation is made in Whimple.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Tom Scott

Full name: Tom Scott

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Policies Map

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: The Exmouth Settlement Boundary at the area designated Bystock Village in the Exmouth Neighbourhood Plan has been changed.

This change is only shown in the Local Plan Policies Map and mentioned in the Settlement Boundaries Evidence Paper. It is not explicitly described in any of the Local Plan Chapters published online for Regulation 19 consultation but it fundamentally changes the basis for development on the north eastern edge of Exmouth.

The proposed change is based on an unsound application of the Settlement Boundary Criteria B2, false statements about alignment with local allocations and creates specific and avoidable policy conflict between Local Plan (LP) and Exmouth Neighbourhood Plan (ENP) contrary to NPPF guidance. The proposal is thus unsound.

The effect of this settlement boundary shift is to change the Local Plan presumption in favour of development. The made Exmouth Neighbourhood Plan is very clear that Bystock Village is "the last place the community wants to see development" (made ENP Plan). This protective position has been explicitly supported under the current LP&ENP policies and by the Planning Inspectorate in determining recent planning refusals. Creating ambiguity and specific conflict between Local Plan and Neighbourhood Plan policies is pointless if there is no compelling reason to do so.

Paragraph 13.4 of the Settlement Boundary Evidence deals specifically with changes to the Exmouth Settlement Boundary at Bystock Village. The Evidence flaws are:

1. There are no community facilities, either extant or with permission, within the proposed new settlement boundary and so the area does not comply with settlement boundary criteria B2 as asserted in the Evidence. The boundary criteria have been incorrectly applied and the Evidence is incorrect and hence the Plan is unsound.

2. There are no allocations near the new settlement boundary, as stated in the Evidence. The basis for extending the settlement boundary as shown in the Plan is thus false and the Plan unsound.

3. The assertion that, other than allocations, the Old Bystock Estate is largely excluded from the settlement boundary is wholly misleading and untrue. The Evidence was presented to the Strategic Planning Committee who have thus been misled in the basis for decision making and the Plan is therefore unsound.

4. The new settlement boundary creates a direct and specific conflict with the made Neighbourhood Plan. The new settlement boundary enables no new strategic numbers of houses, it is not required by any Local Plan Policy and it is not required by the NPPF. It is however explicitly contrary to the heritage protection policies in the made Neighbourhood Plan. The Neighbourhood Plan is not out of date and there is no evidence that its heritage protection policies need to change. Creating explicit and unnecessary policy conflict between a new Local Plan and made Neighbourhood Plan is contrary to NPPF guidance on the relationship between Local and made Neighbourhood Plans making the Plan unsound.

5. The only outcome of the proposed settlement boundary change is to change a smooth and soft settlement boundary into a crude, irregular penetration into the countryside. The enabling of infill housing will eviscerate the heritage protections in the made Neighbourhood Plan and result in the obliteration of the unique “sense of place” that currently exists in Bystock Village. It will also irrevocably destroy the original spatial and architectural integrity that currently surrounds the Grade 2 listed Bystock Court.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The simplest solution is to remove the proposed settlement boundary change, returning the Exmouth Settlement Boundary at Bystock Village to its existing position (Local Plan 2013-2031). This modification would require no other changes to any element of the proposed Local Plan. The outcome would be wholly consistent with the LP settlement boundary criteria and new LP Spatial Strategy; it

would follow NPPF requirements; would be aligned with draft Strategic Policies 05 and 06; would be consistent with draft Heritage policies in the LP; would leave ENP heritage protection policies undiminished and leaves a wholly clear planning policy position that has already been specifically validated by previous Planning Inspectorate decisions.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jennie Scott

Full name: Jennie Scott

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Policies Map

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: The Exmouth Settlement Boundary at the area designated Bystock Village in the Exmouth Neighbourhood Plan has been changed.

This change is only shown in the Local Plan Policies Map and mentioned in the Settlement Boundaries Evidence Paper. It is not explicitly described in any of the Local Plan Chapters published online for Regulation 19 consultation but it fundamentally changes the basis for development on the north eastern edge of Exmouth.

The proposed change is based on an unsound application of the Settlement Boundary Criteria B2, false statements about alignment with local allocations and creates specific and avoidable policy conflict between Local Plan (LP) and Exmouth Neighbourhood Plan (ENP) contrary to NPPF guidance. The proposal is thus unsound.

The effect of this settlement boundary shift is to change the Local Plan presumption in favour of development. The made Exmouth Neighbourhood Plan is very clear that Bystock Village is "the last place the community wants to see development" (made ENP Plan). This protective position has been explicitly supported under the current LP&ENP policies and by the Planning Inspectorate in determining recent planning refusals. Creating ambiguity and specific conflict between Local Plan and Neighbourhood Plan policies is pointless if there is no compelling reason to do so.

Paragraph 13.4 of the Settlement Boundary Evidence deals specifically with changes to the Exmouth Settlement Boundary at Bystock Village. The Evidence flaws are:

1. There are no community facilities, either extant or with permission, within the proposed new settlement boundary and so the area does not comply with settlement boundary criteria B2 as asserted in the Evidence. The boundary criteria have been incorrectly applied and the Evidence is incorrect and hence the Plan is unsound.

2. There are no allocations near the new settlement boundary, as stated in the Evidence. The basis for extending the settlement boundary as shown in the Plan is thus false and the Plan unsound.

3. The assertion that, other than allocations, the Old Bystock Estate is largely excluded from the settlement boundary is wholly misleading and untrue. The Evidence was presented to the Strategic Planning Committee who have thus been misled in the basis for decision making and the Plan is therefore unsound.

4. The new settlement boundary creates a direct and specific conflict with the made Neighbourhood Plan. The new settlement boundary enables no new strategic numbers of houses, it is not required by any Local Plan Policy and it is not required by the NPPF. It is however explicitly contrary to the heritage protection policies in the made Neighbourhood Plan. The Neighbourhood Plan is not out of date and there is no evidence that its heritage protection policies need to change. Creating explicit and unnecessary policy conflict between a new Local Plan and made Neighbourhood Plan is contrary to NPPF guidance on the relationship between Local and made Neighbourhood Plans making the Plan unsound.

5. The only outcome of the proposed settlement boundary change is to change a smooth and soft settlement boundary into a crude, irregular penetration into the countryside. The enabling of infill housing will eviscerate the heritage protections in the made Neighbourhood Plan and result in the obliteration of the unique “sense of place” that currently exists in Bystock Village. It will also irrevocably destroy the original spatial and architectural integrity that currently surrounds the Grade 2 listed Bystock Court.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The simplest solution is to remove the proposed settlement boundary change, returning the Exmouth Settlement Boundary at Bystock Village to its existing position (Local Plan 2013-2031). This modification would require no other changes to any element of the proposed Local Plan. The outcome would be wholly consistent with the LP settlement boundary criteria and new LP Spatial Strategy; it would follow NPPF requirements; would be aligned with draft Strategic Policies 05 and 06; would be consistent with draft Heritage policies in the LP; would leave ENP heritage

protection policies undiminished and leaves a wholly clear planning policy position that has already been specifically validated by previous Planning Inspectorate decisions.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

rachel Scott

Full name: rachel Scott

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: to ensure our objections are taken into account

Peter William Scott

Full name: Peter William Scott

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan will have a detrimental impact on the quality of life of those like myself living in Budleigh Salterton.

Michelle Seabrook

Full name: Michelle Seabrook

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The local area is already struggling with parking. Amenities are also already under extremem pressure, the water company, hospital just to name a few. Exmo_20 would cause harm to the heritage assetts at the medieval settlement, most significantly the st john in the wilderness grade 2 listed church and the rural setting for worship and burials which currently exists, this is contrary to policy HE02

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

Do not access via southern wood

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a local resident i would like to be included in future plans for the area

James Seabrook

Full name: James Seabrook

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade I1* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan., It would

cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo 20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to..air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY ARO1B

Exmo_20 would increase the need for car travel, contrary to Figure 7- the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: While I recognise the continual need for more homes, there is nothing I find suitable about the exmo_20 area. Such an enormous development is wholly unsuitable for the environment and the surrounding infrastructure. Suggestions for a road connection through Southern Wood

are laughable - clearly no-one has looked at the state of Meadow View Road's parking in recent years. The road could not possibly cope with becoming a shortcut for an estate that size.

Exmo_20 should be removed from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Daphne Searle

Full name: Daphne Searle

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: It's unclear if the draft local plan referring to Feniton has been developed in a legally compliant way, as there was a petition signed by 500+ residents, plus emails & comments which were NOT taken into consideration in previous consultations, as it was not submitted via Common Place. The result being that these reports weren't put to the Strategic Planning Committee by EDDC, & therefore depriving the local community of having it's - very vocal!! – voice heard. This is totally undemocratic, & makes a mockery of the whole system. This Common Place system is really difficult to navigate, & extremely time consuming, thereby deterring the average person from pursuing this way of commenting – yet another way for the opinions of the locals being diminished - again is totally undemocratic.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

This development is totally unsuitable for Feniton in many ways:-

1) Flooding – I've lived in Feniton for almost 25 years & have seen the village constantly being flooded in many areas time after time, with houses, gardens & roads repeatedly flooded – including mine ! Fortunately it didn't actually enter our house, but we had a 'moat' (with raw sewage) around our house more than once. Terrifying for all concerned. We have the final stages of the Flood Alleviation scheme being built as I

write this. Hopefully it will fulfil its remit of keeping flooding from the resident's homes, however, we have been assured that this will just move the flood water down to under the bridge at Pattesons Cross, thereby cutting off the village by its main artery – the very road which large vehicles will be using to go to & from the industrial site!!. They will then be forced to go through Feniton old village, which is a complete nightmare, as the roads are too narrow – single track in many places, all with no pavement for pedestrians & esp for school children, and we saw the havoc & chaos this caused during 6th -31st January this year when Kier construction company had to close this Ottery Rd/ Broad St for construction of the FAS. There were buses & lorries coming in opposite directions not able to pass each other, & causing a nightmare esp at commuter & school times. The village tolerated this inconvenience as we knew it was for – hopefully – a better Feniton, with fewer - hopefully, no - houses being flooded, but to have this situation as 'normal' is beyond intolerable. There WILL be accidents!!! Let's pray they won't be serious ie a pedestrian (child!?) seriously injured - or worse.

2) We had the Super Enquiry in 2014 (which I & many other Fenitonians attended) which deemed that Feniton is unsuitable for further development. Even with the, as yet untested, FAS, nothing has changed :-

a) The village will still have roads flooded. b) There is inadequate public transport. c) Schools are at capacity, as are the Doctors surgeries. d) Don't get me started on the over flowing sewage system!!! Raw sewage being spewed onto the roads & pavements where pedestrians - esp children - get sprayed with this deadly mix daily! This raw sewage is often backed up into people's homes!! More development guarantees more raw sewage. e) Promises made by previous developers have not materialised.

3) The number of houses planned for Feniton in the draft plan is disproportionate & doesn't match to the DCT survey, funded by EDDC. The DCT identified a local need for just 13 dwellings up to 2027. On top of that, there are still brand new houses in Acland Rd still empty & up for sale! So why do we need any more??

There is now a mismatch between vision & strategy because when the Strategic Planning Committee realised that the number of houses allocated for Feniton were far higher than local needs, the chairman (unbelievably!) instructed the officer to rewrite the Strategic Policy SP01 in the reg 19 version, in order to justify the increased development proposed for Feniton!!! This then makes the proposed development in Feniton from ‘limited’ to huge for a tier 4 village

4) Sites Otry_20 & Feni_08 are both in unsafe locations as the roads are totally unsuitable. As previously stated, the roads are too narrow with no pavements, with 2 hump back railway bridges, one with a blind bend. The junctions at either end of this lane (Green Lane) are especially dangerous. All this highlights the dangers & unsuitability of adding more traffic to this area, plus, putting in an industrial site as well on such roads with heavy lorries will cause untold havoc, to say nothing of the further deterioration of the roads locally (we all know about the innumerable, dangerous potholes everywhere!)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

To remove Feni_08 from the draft local plan – or at least reduce the number of houses allocated for Fen_08

To remove Feni_20 totally from the draft local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Amanda Seymour

Full name: Amanda Seymour

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

amelia sgroi

Full name: amelia sgroi

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development should be located in another place where it will not cause harm to the Pebblebed Heaths.

Exmo_20 will destroy the 'tranquility, wildness and dark skies' of the countryside. It would fragment and isolate habitats and destroy wildlife corridors. It would be detrimental to irreplaceable habitats. All contrary to policies OL01, OL09, PB04

I will increase the need for car travel and increase congestion. It is very isolated so people will need to drive to leave and enter the site. It is too far and too steep for people to use walking and cycling as their choice of transport. Contrary to policy TR01

The main access point is closer to Budleigh than it is to Exmouth, making Budleigh the most accessible town, but without the services and infrastructure to support this influx in the Dr's, pharmacy, school etc. Contrary to policy OL05

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Lara Shaddick

Full name: Lara Shaddick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (Doctors/dentists, schools, high street, beach etc) would be the preferred choice for new residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. In addition, the sewage and waste water systems are already failing to cope, this development would make an already unacceptable situation worse

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Rebecca Shand

Full name: Rebecca Shand

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I don't normally get involved with building plans as I understand that folks need somewhere to live - but this too much, too big and impractical.

I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Please consider the impact this would have on land that is historically and environmentally important and reject this application. Not on your watch, as they say.

Deb Shatford

Full name: Deb Shatford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The services and infrastructure of Budleigh Salterton are insufficient to cope with this development. Budleigh being closer to the access point than Exmouth. The plan would cause significant harm to the pebbled heaths against the SSS, SAC, SPA & NNR as its a significant foraging habitat, contrary to Policy PB01. It would cause harm to irreplaceable habitats, trees and hedgerows. Car travel and congestion would be increased, and the B3179 often has accidents as road entrances are on bends and difficult to access.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Deb Shatford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD08

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There is insufficient infrastructure in Budleigh to support these new houses. There is already a 3 week wait for a doctors appointment, the roads are in poor condition and further traffic would contribute more to this. The school children are in portacabins. The sea has almost daily sewage spills from South West Water, as sewers unable to compete with demand, especially if we have small amount of rain. Additional houses would make this even worse.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Martin Shaw

Full name: Martin Shaw

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

2. Do you consider that this part of the High Quality Design chapter is legally compliant?: Yes

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: Picture shows two buildings, each of which is reasonably well designed, but which do well together. So instead of illustrating good overall design, this image highlights problem of failing to make neighbouring buildings compatible, which is an all too common problem with planning in the district.

Full name: Martin Shaw

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.8

2. Do you consider that this part of the vision chapter is legally compliant?: Yes

3. Do you consider that this part of the vision chapter is sound?: No

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Because the plan proposes that new infrastructure be delivered alongside development, but includes no mechanisms for ensuring this.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Propose mechanisms and/or specify that where new infrastructure will not be delivered alongside development, there will be a presumption that applications will be refused.

4. Do you consider that this part of the vision chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

Fiona Shaw

Full name: Fiona Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. ? The Habitats Regulations assesment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sara Shaw

Full name: Sara Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth. The Services and infrastructure of Budleigh (High Street, GP Surgery, School and the Beach) would be compromised. This contravenes Policy 0L05 of the local plan.

Exmo_20 development contravenes Policy PB01.

Exmo_20 would cause harm to the heritage assets including St John In the Wilderness Grade II listed Church and Churchyards. This is contrary to Policy HE02.

Exmo_20 would have a detrimental effect on designated wildlife sites. Contrary to Policy 0L01.

Exmo_20 development would be in direct conflict with the Strategic Nature Area 368.

Exmo_20 would be in direct conflict with Policy 0L09, and PB04.

Exmo_20 Development on heavy subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk. Conflict with Policy AR01B.

Exmo_20 would increase the need for car travel, increasing traffic congestion. The isolation of the Development would mean people travelling much further to access key services. It is too far and steep from any Town to be cycled or walked. Contrary to Policy TR01.

Remove Exmo_20 from The Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from The Local Plan.

Full name: Martin Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Housing on sites 03 and 05 will contradict other policies of the plan. TR01 specifies wheeling cycling cycling and public transport as ‘first choice’ but wheeling and walking will not realistically be viable choice for most residents due to distance from centre. TR01 also specifies ‘high quality public transport’ but this will not be available. SP01 specifies development to match local needs but development on this site will inevitably be mainly larger detacheds which will attract incomers. HN01 specifies priority for affordable housing and young people but development on this site will inevitably be mainly non-affordable and attract older people. Seaton already has a large shortage of social housing and a huge population imbalance (almost 45% 65+) so any development should specify social housing only. OL01 protects important local landscapes and the council’s Landscape Architect as well as an Inspector have previously emphasised the detrimental effects of development on this site. Policies emphasise protecting landscape which is relevant to tourist attractions and the proximity of this site to the Wetlands should exclude it. Policies also emphasise prevention of settlement coalescence (Green Wedge) and the inclusion of this site will contribution to that. Altogether the inclusion of this site makes the plan as a whole incoherent as well as having detrimental effects on the local environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To make the local plan coherent, these sites should be deleted from the policy. The policy should also

include new paragraphs addressing Seaton's population imbalance and the specific need for social housing, in more central locations. Seaton does not need any more developments of larger detached houses (there have been several large developments of this kind in recent years) until this is addressed.

Hannah Shaw

Full name: Hannah Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I do not know what this means or where to find information about it, therefore I cannot agree that it is legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I do not believe that Whimple can cope with a big increase in number of new homes due to the existing infrastructure and the lack of opportunity to be able to improve it. For example, the road through the village is narrow, with blind bends and houses on either side, preventing it from being widened. An increased number of cars, delivery vehicles as well the initial construction traffic, will make it dangerous to both drive and walk through Whimple.

Whimple Primary School has already expanded the buildings to meet pupil needs and even now, uses the Victory hall every day because of a lack of suitable hall space. Building 33 homes on Whim_11 (and the proposed 50 homes on Whim_08) will increase the number of pupils (and therefore the associated traffic to and from school)- how does the council plan to meet the needs of all these pupils?

I also do not believe that Whim_11 is a sound choice due to the flood risk and the associated risk to properties nearby. What will happen to existing homes if the stream floods further downstream near Slewton Crescent?

Also, the loss of another green field is extremely disappointing, especially as there are thousands of homes that have, and are, still being built only a few miles from the village in Cranbrook.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not develop the site!

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I do not believe that the best interests of the residents of Whimble have been considered. There is a lack of planning relating to how the infrastructure will cope with the additional homes and what will be implemented to improve or help the situation. The transport connections have also not been fully considered as although Whimble has a train station, there are limited stops and also no regular bus service into Exeter. The numbers of home proposed to be built in Whimble (83), far exceeds the housing needs of residents already living nearby (according to the Parish Council Housing Needs Survey). The environmental protection is lacking due to the flood risk and loss of natural environment.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Hannah Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I cannot comment on this as I do not know if this part is legally compliant as I do not know where to access information about it.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I do not believe that the plan has been positively prepared. I believe that Whim_08a is not a sound site for a housing development in the village for the following reasons:

- The Parish Council commissioned a housing needs survey and the results showed that at least 4 affordable homes may be needed within the next 5 years. Allocating 83 new homes to Whimble far exceeds the needs of the village. This is especially true considering that the new town of Cranbrook is only 4.5 miles away and 500 homes for that settlement actually fall within the boundary of the parish of Whimble, which therefore more than makes-up this need.
- Councillor Geoff Jung's reason for supporting the Whimble 08a site during the Strategic Planning Committee 1st October 2024, was that "We have allocated 35 homes for Whimble and it has a train station. How can I justify that to the residents that I represent and villages that are have taken far far more, I want to see some development at this site". This is not a sound reason to develop a particular site and illustrates that

the plan has not been positively prepared. I do not believe that the strategies and policies are justified and have not been based on solid evidence. Professional planning officers assessed Whim_08 and recommended that the site was not allocated for a number of reasons, see the bullet points below:

- The proposed site forms part of the green wedge between Cranbrook and Whimble.
- Whim_08a is an important part of the attractive rural landscape.
- There is a potential impact on wildlife.
- Part of the site is at risk of flooding.
- The scale of the development is not compatible with the special strategy.
- There is very limited safe pedestrian access to the facilities in the village.

Building upon the green wedge will lead to the possibility of settlement coalescence of Cranbrook with Whimble. This would result in the loss of the individual character of the village, as well as the loss of the surrounding countryside, which gives Whimble its unique identity. Also, it sets a precedent for further development in this area. The infrastructure of the village is not sufficient for the increase in number of homes: o

Whimble Primary School is not of a sufficient size for an increase in number of pupils. o Church Road is single track in many places, with very few pavements, making it unsafe for an increased number of children to be walking to and from school.

o Building homes at Whimble 08a will result in more traffic driving through the village to access the facilities. The roads are narrow and visibility poor in many places, making it dangerous. o Church Road near the school is frequently congested, due to families driving to school. o There is very limited parking elsewhere in the village.

Developing Whim_08a is not a sound and effective proposal. This is due to the many sustainability issues involving the lack of suitable infrastructure including a primary school which cannot cope with the influx of many more pupils, the narrow road with blind bends and the lack of pavements. There is also the issue of potential flood risk which could cause problems not only on the site but may also affect nearby properties that are currently unaffected. There is also the loss of green field and habitat, which will never be recoverable as well as the erosion of the green wedge, which is supposed to prevent development from spreading from one settlement to another. The National Planning Policy Framework, Identifying land for homes 72. states that planning policies should identify a supply of both a) sites for 5 years following the date of adoption and b) developable sites or broad locations for growth for years 6-15 of the remaining plan period. If 50 homes are built upon Whim_08a in the near future, I can fully imagine where the next quota of houses will be situated: on Whim_08a. This site is not sustainable and therefore not an effective and sound choice.

Although the Government have decided that a certain number of new homes must be built and allocated in East Devon, I do not believe that local priorities have been fully addressed. For example, the number of houses allocated far exceeds the needs that the Parish Council Housing Needs Survey identified. Furthermore, the Site Selection report states that: ‘Contribution to spatial strategy Whimple is a is a 'Tier 4' settlement, where the draft local plan seeks to promote limited development to meet local needs. The development of up to 180 dwellings on Whim_08a is considered to be excessively high in relation to the scale of the existing village.’

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Whim_08a should not be developed at all.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

- Transport connections: I do not believe that the full implications of the extra traffic that a development of 50 homes would create, have been fully considered. The main road to the village is single track in many places, with blind bends and buildings/gardens flanking the road, therefore widening the road is impossible. It cannot safely and sustainably support the increase in the traffic that a development of this size would create. Whimple is often promoted as having a train station, however, the service is not reliable and the number of stops reduced significantly after the creation of the train station at Cranbrook. Furthermore, being realistic, residents may drive to the train station, therefore putting the limited parking facilities under greater pressure.

- Housing needs: The Parish Council commissioned a housing needs survey and the results showed that at least 4 affordable homes may be needed within the next 5 years. Allocating 83 new homes to Whimble far exceeds the needs of the village. Also, when studying the numbers on the Regulation 19 Publication Draft, February 2025, Appendix 2 – Designated Neighbourhood Area Housing Requirement Figures Breakdown, states that Whimble has 500 homes allocated under the Adopted Cranbrook Plan Allocations. If these homes fall within the boundary of the parish of Whimble, then a further 83 homes is completely unnecessary. The nearby village of West Hill has only been allocated 64 homes and doesn't include any homes from Cranbrook encroaching the village.

- Environmental protection: Planning officers have already dismissed Whim_08a as being unsuitable in part due to the resulting loss of very attractive rural countryside and the potential impact on wildlife sites. The officers also highlighted concerns over potential flooding on the site. There has been no mention how building 50 homes here will affect the flood risk, not only to new homes but existing homes. Protecting the existing homes must be a priority, not only considering flooding but also from a visual, environmental pollution, light pollution and noise pollution perspective.

- Infrastructure planning: The infrastructure of the village is not sufficient for the increase in number of homes. There has been no communication of ways that the following issues could be rectified:

- o Whimble Primary School is not of a sufficient size for an increase in number of pupils. The school already relies daily on using the Victory Hall to be able to provide sufficiently for the current pupils. This in turn means that other users, cannot access and benefit from the hall.

- o The road through the village is single track in many places, with very few pavements. It is therefore not safe for an increased number of children to be walking to and from school (see photos)

- o Church road near the school already becomes congested, especially in the morning and at school collection time, but also during the daytime, as many cars remain parked along the road opposite the Hive all day. This, combined with the existing road usage of tractors, school buses, delivery drivers etc, make the idea of further increasing the vehicular and foot traffic a nonsensical notion. The Headteacher at Whimble Primary School has voiced concerns over safety regarding drop off and collection times and parking whilst doing so. This is a quote from a school newsletter dated 24.01.25: (also see attachment)

“PARKING: Due to the requirements of the start and end of the day, schools by their very nature end up causing congestion around them. It is important, particularly in villages with narrow roads, like Whimble, that we all do what we can together to help minimise the impact of this for the locals who live here. We have had reported a number of near misses with cars and children, particularly in the hall car park but also, from older children walking home. We want to keep all our children and families safe so it is up to you to help with this. How you can help: Reduce your speed - do not zoom across to park beside the road near to the school. Parents are asked not to park in the hall car park as this is for hall users and the doctors surgery. The Thirsty Farmer continues to support the school by allowing parents to park there - please do this with consideration for others. Be considerate of pedestrians - look around, especially when opening car doors.”

Building homes at Whimble 08a will result in more traffic driving through the village to access the facilities such as the school and the village stores. The roads are narrow and visibility poor in many places, making it dangerous for both pedestrians and drivers.

- o There is very limited parking in the village, with the Victory Hall car park often full, cars often parked extremely close to the roundabout near the Thirsty Farmer, the Square

often being full of parked cars and the car park off Webbers Close, also often full to capacity. (see photos attached)

o Sandfords doctor surgery is also quoted as a positive reason to increase the number of homes in the village. However, this is purely a different setting, manned by Coleridge Medical Centre in Ottery. I do not believe that it provides a greater number of appointments to users of the surgery and is also used by patients outside of the area, who drive in to the village, if they are offered an appointment here, instead of in Ottery. It is already difficult to receive the medical care that we are all entitled to and currently hard to get an appointment- Councillor Todd Olive implied as such as he put forward Whim_08a as a potential site. No doubt, any additional patients using the surgery will only increase the traffic and parking issues.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I wish to represent the voice of Whimple residents.

Justin Shaw

Full name: Justin Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This comment relates to the whole paragraph. It argues that the Whimple 11 is NOT a sound site for development.

Positively prepared: As part of the work on the Whimple neighbourhood plan, the Parish Council commissioned a Housing Needs Survey. The Whimple Parish Housing Needs Report states ‘The survey identified a need for at least 4 affordable homes within the next 5 years.’ The allocation of 33 houses to Whim_11 is not consistent with the requirement established by the Parish Council. The counter argument to this is that the wider local plan needs to ‘consider how we might help neighbouring areas meet their needs too’. However, Whim_11 and the wider plan for Whimple seems to ignore the expansion of Cranbrook, the erosion of the Green Wedge between the two settlements, the allocation of 611 - 500 of which relate to Cranbrook expansion - to the Whimple Parish between now and 2042. In summary, I contest the requirement to develop in Whimple and, when considering the wider needs of the Local Plan, I argue that Whimple has more than its fair share of development planned within its Parish boundaries.

Justified: I believe Whimple 11 to not be a justified site for development because the site is not sustainable - a key justification point for the policy in paragraph 3.2. The sustainability issues are: it lacks safe pedestrian access to services and facilities; there is a stated 20% risk of flooding which must be fully analysed by the developers before building starts – this doesn’t consider the wider water run-off and impact on The Green

which is an area of Whimble which consistently suffers from flooding; it will likely have an impact on unconfirmed wildlife sites.

Effective: The policy of aligning growth with infrastructure has clouded the judgement of the local plan because ‘on paper’ Whimble is an attractive potential Service Village with good facilities, services and infrastructure. When viewed against the mandate to build circa 20,000 homes in East Devon by 2042, I understand the appeal of allocating development to Whimble. However, the reality of living in Whimble is that access to the village from the A30 and throughout the settlement to the associated facilities, is already heavily limited – I would argue it is at capacity but have no hard evidence to back this up. Subjectively, it can take over 10 minutes to get out of the village at rush hour (normally a 4 minute drive) due to congestion at bottlenecks throughout the settlement. There is no opportunity to develop better access owing to immovable objects such as properties and the church. Based on this I argue that further development, and an increase in the population of Whimble, targeting the preexisting facilities, is unsound and unsustainable due to the limited access bandwidth. This doesn’t consider the impact, albeit temporary, during the construction phase of any new development which would be considerable. At the 1 November SPM it was also highlighted that no significant development had occurred in Whimble for around 20 years. Instead of assuming that this makes Whimble prime for development in the 2020 - 2042 Local Plan, I contend it reinforces my argument that Whimble 11 is an unsound site for development. Whilst I assume development in Whimble has previously been considered, it has been discounted for over 20 years. I suspect part of the reason for Whimble being rejected is because of the practicality issues associated with access to the settlement. In summary of this paragraph, development of Whimble 11 will further exacerbate the aforementioned issues, detract from the rural appeal of the village be dangerous because the infrastructure (roads, paths, parking) lack the bandwidth for further development.

Consistent with national policy: No comment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Flooding risk and mitigation must be mandated in this chapter.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Transport connections. Access to Whimble is limited by bottlenecks caused by pre-existing infrastructure. This limits access to the village by large vehicles (construction vehicles, buses etc) and cars. An alternative is to use the pre-existing train station but again there is limited access to the facility by pedestrians (no continuous path connecting one side of the village to the other), cars (bottlenecks) and very limited parking throughout the village and at the train station itself.

Housing needs. As part of the work on the Whimble neighbourhood plan, the Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states 'The survey identified a need for at least 4 affordable homes within the next 5 years.' The 83 houses allocated to Whimble (Whim_08a and Whim_11) exceed the need highlighted by this survey.

Environmental protection. The Whim_11 site comes with a known flooding risk but does not consider the wider flooding issues downstream of the proposed site and which are already a notable issue in the village.

Infrastructure planning. The plan does not mandate appropriate improvements to the pre-existing supporting infrastructure (specifically improvements to roads and paths to alleviate access bottlenecks throughout the settlement). Practically, these would be difficult to incorporate given very limited opportunity to widen the bottlenecks through the village owing to pre-existing houses and the church. Flood protection for pre-existing properties must be mandated in the text.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Justin Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

This comment relates to the whole paragraph. It argues that the Whim_08a is NOT a sound site for development because it is at odds with the justification for the policy laid out in Chapter 3, the Spatial Strategy.

Positively prepared: At the 1 November 2024 SPM, when Whim_08a was allocated, there was clear pressure from Councillors to allocated new housing to Whimble because they wanted to justify wider their development decisions to the residents of their parishes. This undue pressure created a perceived need and urgency to allocated housing to Whimble in this Local Plan. Conversely, the decision did not consider the wider 611 houses allocated under the Whimble Designated Neighbourhood Area (page 37 of the Local Plan). Whilst the majority of these houses form part of the Cranbrook development in the vicinity of Cobden Lane, they are clearly stated as being in the Whimble Parish. Between the expansion plan of Cranbrook and the Whim_08a development there is an erosion of the Green Wedge and therefore increased risk of Whimble becoming consumed by Cranbrook in subsequent future development plans – again I would argue Whimble 08 is unsound based on this.

Justified: I believe Whim_08a to not be a justified site for development because the site is not sustainable - a key justification point for the policy in paragraph 3.2. This view was captured by the professional planning officers Site Selection Report, Whimble dated September 2024. They stated that the proposed 08 development (originally proposed as

180 homes) was: incompatible with the Spatial Strategy; lacked safe pedestrian access to services and facilities; encroached on part of the green wedge between Whimble and Cranbrook (an critical area required to maintain the identity of Whimble); proposed in an important part of the attractive rural landscape; likely to have an impact on unconfirmed wildlife sites; caused a potential risk of flooding and further survey work would be required on the site before being allocated. It was the recommendation of the report that the site should not be developed, nor should a reduced development be accepted. At the 1 October 2024 Strategic Planning Committee, Whim_08a was rejected as a site for development. With no new evidence presented, this decision was overturned at the 1 November 2024 Strategic Planning Meeting (SPM). This alone demonstrates that Whimble 08 is an unsound choice for development.

Effective: The policy of aligning growth with infrastructure has clouded the judgement of the local plan because ‘on paper’ Whimble is an attractive potential Service Village with good facilities, services and infrastructure. When viewed against the mandate to build circa 20,000 homes in East Devon by 2042, I understand the appeal of allocating development to Whimble. However, I believe this strategic pressure has created a pressure to allocate sites which have previously been discounted as being unfit for development – resulting in unsound decisions - and Whimble 08 is one of those sites. The reality of living in Whimble is that access to the village from the A30 and throughout the settlement to the associated facilities, is already heavily limited – I would argue it is at capacity but have no hard evidence to back this up. Subjectively, it can take over 10 minutes to get out of the village at rush hour (normally a 4 minute drive) due to congestion at bottlenecks throughout the settlement. There is no opportunity to develop better access owing to immovable objects such as properties and the church. Based on this I argue that further development, and an increase in the population of Whimble, targeting the pre-existing facilities, is unsound and unsustainable due to the limited access bandwidth. This doesn’t consider the impact, albeit temporary, during the construction phase of any new development which would be considerable. At the 1 November SPM it was also highlighted that no significant development had occurred in Whimble for around 20 years. Instead of assuming that this makes Whimble prime for development in the 2020 - 2042 Local Plan, I contend it reinforces my argument that Whim_08a is an unsound site for development. Whilst I assume development in Whimble has previously been considered, it has been discounted for over 20 years. I suspect part of the reason for Whimble being rejected is because of the practicality issues associated with access to the settlement. In summary of this paragraph, development of Whim_08a will further exacerbate the aforementioned issues, detract from the rural appeal of the village be dangerous because the infrastructure (roads, paths, parking) lack the bandwidth for further development.

Consistent with national policy: No comment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I propose that Whim_08a be removed from the local plan. I don't believe it to be a sound proposal for the reasons highlighted in 3b. I am unable to propose an alternative site but based on my argument no sites in Whimble are appropriate.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Transport connections. Access to Whimble is limited by bottlenecks caused by pre-existing infrastructure. This limits access to the village by large vehicles (construction vehicles, buses etc) and cars. An alternative is to use the pre-existing train station but again there is limited access to the facility by pedestrians (no continuous path connecting one side of the village to the other), cars (bottlenecks) and very limited parking throughout the village and at the train station itself.

Housing needs. As part of the work on the Whimble neighbourhood plan, the Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states 'The survey identified a need for at least 4 affordable homes within the next 5 years.' The 83 houses allocated to Whimble (Whim_08a and Whim_11) exceed the need highlighted by this survey. Additionally, at the 1 November 2024 SPM, when Whimble 08 was allocated, there was clear pressure from Councillors to allocate new housing to Whimble because they wanted to justify wider their development decisions to the residents of their parishes. This undue pressure created a perceived need and urgency to allocate housing to Whimble in this Local Plan. Conversely, the decision did not consider the wider 611 houses allocated under the Whimble Designated Neighbourhood Area (page 37 of the Local Plan). Whilst the majority of these houses form part of the Cranbrook development in the vicinity of Cobden Lane, they are clearly stated as being in the Whimble Parish. Between the expansion plan of Cranbrook and

the Whimble 08 development there is an erosion of the Green Wedge and therefore increased risk of Whimble becoming consumed by Cranbrook in subsequent future development plans – again I would argue Whimble 08 is unsound based on this.

Environmental protection. The professional planning officers site survey report (September 2024) of Whim_08a did not recommend the site for development with flooding concerns being raised.

Infrastructure planning. The plan does not mandate appropriate improvements to the pre-existing supporting infrastructure (specifically improvements to roads and paths to alleviate access bottlenecks throughout the settlement). Practically, these would be difficult to incorporate given very limited opportunity to widen the bottlenecks through the village owing to pre-existing houses and the church.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

christopher shell

Full name: christopher shell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The land in Station Road Whim 11 is unsuitable for housing development for a large number of reasons. Part of the field is a flood plain and the field in general is permeable land acting as a sponge during the increasingly heavy rainfall that we are experiencing. If it is built upon the rainfall will add further to the already existing floodplain and floodwater will flow to the area of Whimble that has already suffered severe flooding in the past. There is also the risk of floodwater mixing with sewage further downstream which will eventually enter the Exe estuary with all the environmental issues that will be created as a result. The field also has numerous mature trees that have tree preservation orders placed upon them. There is an abundance of wildlife in and around the field including bats, owls, woodpeckers, field mice and no doubt other species that need protection. The proposed development of 33 houses would be completely out of character with the existing nearby houses which includes a grade 2 listed house and a number of detached houses. Incongruous development would damage this field which is a delightful hay meadow. Planning permission for Whim 11 has already been refused on at least two previous occasions and is precisely the reason why we purchased the house as we have open views across the field from the rear of our home.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: No further housing development should take place in Whimble.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The access through Whimple is narrow and unsuitable for an increase in traffic that any future development would bring. There are no pavements in a large area of the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: No further developments in Whimple.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Housing development has already been refused three times for Whim 11. That status should remain.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Diane Shell

Full name: Diane Shell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This field was not developed by Bovis homes 28 years ago as planning permission was refused on the grounds of green site in Whimple. Farmers who rented the land and later bought it from Allied Domecq on the understanding that it would be for agricultural use.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This land should remain a green site, considering flood issues, preservation orders on the trees and wild life habitats. This small piece of land could not possibly contain 33 homes and potentially 66 cars plus pavement and roads.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This land is not sound due to flooding issues not only for near by properties but also properties in The Green at lower levels within the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This land should not be modified but remain green site to prevent flooding issues in the village and protect wildlife and preserved trees and hedges.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No development plans have been sent to neighbouring properties most affected by housing that could cause flooding to their properties and light pollution. My property which is next to the field and built at a lower level to the field after heavy rain causes water logged lawn and pooling of water in patio area. If 33 properties were built this could cause water to enter the house.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Thomas Shillitoe

Full name: Thomas Shillitoe

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11.6

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: This paragraph is ambiguous, the figure of 1,600 metres should not be used, distance to services/facilities etc should be 800m as the 1600m is total trip 'there and back' [All links reference on p.186 of the Local Plan are broken/out of date but the Government's National Design Guide does states 800m. "Sustran, Walkable neighbourhoods" also states 800m as standard walkable distance and 1600m total trip]. Distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. All site sustainability / accessibility must be reassessed using the above criteria.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All site sustainability / accessibility must be reassessed using the above 800m / centre point of site criteria.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Sites have not been assessed in accordance with a corrected 800m figure and now should be.

Full name: Thomas Shillitoe

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: SP01 Point B sets out EDDC's strategy that significant development will be at the Principal Centre of Exmouth. This is becoming an issue as Exmouth has sprawled so much that many of the housing sites proposed are nowhere near the centre of the town, where services and facilities are predominantly located. A much more logical strategy should be a measure of local population per service/facility throughout the district, to see where there is over or under capacity currently in East Devon. To have continuous development on one peninsula town is unsustainable. All sites throughout the district should measure against the same requirement for proximity to services with capacity (or per capita ratio)(schools / doctors etc). Prioritising an existing town irrespective of whether it has spare service/infrastructure capacity or not does not seem strategic. Of note for Exmouth as due to its peninsula location and significant late 20th century sprawling suburbs, distances to services can be significant.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All sites throughout the district should measure against the same requirement for proximity to services and per capita capacity assessed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : To understand why EDDC believe the largest town, Exmouth should keep getting bigger and growing unsustainably.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Claire Rodway confirmed by email that in accordance with the Site Selection Methodology May 2022 in response to the question: “If a site fails the HELAA site sifting test, being deemed available but not suitable or achievable, can it then be considered for allocation in the Local Plan?” She replied: “No it wouldn’t be considered for allocation because it would have been sifted out earlier in the process so wouldn’t have progressed to site assessment stage, in accordance with the methodology.”

This is applicable to Exmo_20, therefore it’s allocation is not sound.

Email chain attached & SSM May22

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of Exmo_20 from the Local Plan, consider other site which did passed the HELAA stage.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure the inspector is referring to the May 22 site selection methodology

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20, a supporting habitat for foraging Nightjars would be contrary to this, furthermore Exmo_20 is located on the SNA 368 which is being allocated as a site with the Devon Local Nature Recovery Network (LNRS) as required by the Environment Act 2021, so allocation would be in conflict with this strategy of conserving and enhancing the habitat and wildlife of our natural environment. This is unjustified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Other sites, not falling within Nature Recovery Network areas, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: East Devon seem to be completely unaware of this conflict in proposed land use for this high biodiversity and supporting habitat site.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Withycombe Brook, which has significant identified flood risk in Exmouth and has not been assessed in the Strategic Flood Risk Assessment of this draft Local Plan [EDDC Level 1 Strategic Flood Risk Assessment – Final Report February 2024 p.69 states “This table does not provide information on all Main Rivers in East Devon. Other Main Rivers within East Devon are: Grindle Brook, Wotton Brook, Withycombe Brook, Budleigh Brook, Back Brook, Snod Brook, The Gissage and Woodhayne Range.”]. Considering the existing conditions, that the Brook runs through the centre of the largest settlement in East Devon, and the substantial size of the proposed Exmo_20 allocation upstream, this is unjustified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Undertake a Flood Risk Assessment for Withycombe Brook, or remove all sites within its upstream catchment area and select alternative sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To provide local knowledge on the drainage issues.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The procedure for approving the site selections and the draft regulation 19 draft Local Plan relies on the Strategic Planning Committee (SPC) performing in accordance with the councillor Code of conduct and Code of practice for councillors and officers dealing with planning matters. There have been multiple occasions where proceeding appears to have not been in accordance with protocol. Firstly Councillor Ben Ingham's behaviour on 3rd September 2024 and 29th October 2024 is currently under investigation for breaches of the Code of conduct. It has been acknowledge by the EDDC monitoring officer that he breached the Code of practice on 3rd September 2024 by speaking regarding Lymp_07, then taking part in debate, then voting, then not ensuring his actions were recorded suitably. Of note is the complete omission of him speaking to the committee from the meeting's minutes. The significance of these episodes is that the Councillor's conduct potentially influence the Lymp_07 vote and due to the sequential way the site allocations were considered, had implications for all subsequent decisions, as mentioned by the Chair, Councillor Todd Olive, immediately after the Lymp_07 vote, stating, "and we now have 100 more houses to find". The decision making process is potentially not sound and not lawful.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site selection process for all SD01 site allocations needs to be rerun

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The procedure for approving the site selections and the draft regulation 19 draft Local Plan relies on the Strategic Planning Committee (SPC) performing in accordance with the councillor Code of conduct and Code of practice for councillors and officers dealing with planning matters. There have been multiple occasions where proceeding appears to have not been in accordance with protocol. Firstly Councillor Ben Ingham's behaviour on 3rd September 2024 and 29th October 2024 is currently under investigation for breaches of the Code of conduct. It has been acknowledged by the EDDC monitoring officer that he breached the Code of practice on 3rd September 2024 by speaking regarding Lymp_07, then taking part in debate, then voting, then not ensuring his actions were recorded suitably. Of note is the complete omission of him speaking to the committee from the meeting's minutes. The significance of these episodes is that the Councillor's conduct potentially influence the Lymp_07 vote and due to the sequential way the site allocations were considered, had implications for all subsequent decisions, as mentioned by the Chair, Councillor Todd Olive, immediately after the Lymp_07 vote, stating, "and we now have 100 more houses to find". The decision making process is potentially not sound and not lawful.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site selection process for all SD01 site allocations needs to be rerun

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be able to make representation in any debate.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Exmo_20 site is located adjacent to the Pebblebeds Heath, designated as the most significant wildlife site in the south-west, being the only double internationally designated SAC & SPA land based site, and also being a SSSI, NNR and part of the National Landscape. The maps used for the site selection process [attached] include multiple designations from national, county level and local authority level, but omit these SAC & SPA international designations. The LPA must provide all the relevant information so that informed decision can be made. With the above in mind, it is clear that decision makers, such as the Strategic Planning Committee could have been misinformed, relying on incorrect information to form opinions, such that their judgement was unjustified and therefore not sound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 and select alternative sites that will not have a likely significant effect on the Pebblebeds Heath SAC / SPA and will not required significant mitigation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am concerned regarding EDDC's cavalier attitude

towards development adjacent to the Pebblebeds Heath and their ability to undertake their duty as the "competent authority" under the Habitats Regulations.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Resubmitting due to ongoing issues with commonplace: The Regulation 19 Draft Local plan voted for on 11th December 2024 had no Habitats Regulations Assessment (HRA). This is the plan that was used for the Regulation 19 process, please note that minor amendments were made subsequently and agreed on 3rd February 2025, but the vote on that day was strictly for the amendments, not the Regulation 19 Draft Local plan agreed on 11th December 2024. The HRA was published by Footprint Ecology on 30th January 2025. This HRA stated that the draft Local Plan had an inherent conflict. This needed to be address for the plan not only to be deemed sound but also legally compliant. Clearly as the LPA had agreed to proceed with the Regulation 19 Draft Local plan on 11th December 2024, there was no option to address this, in fact the entire Regulation 19 Draft Local was not informed by the HRA, rather that the LPA expected the HRA to support the Plan, as Matt Dickins states in his email dated 4th December 2024 [Dickins email attached] “We will be having an assessment under the Habitat Regulations produced for us in support of the plan”. Throughout the Local Plan preparation process, EDDC, as the ‘competent authority’ have demonstrated a widespread cavalier attitude, or a fundamental misunderstanding, regarding their obligations under the Conservation of Habitats and Species Regulations. The HRA should have informed the decision making and must not show conflict prior to progressing to Regulation 19 publication. By producing the HRA after agreeing the Regulation 19 Draft Local plan, the LPA have possibly erred in law. The NPPF states “Significant adverse impacts on these [environmental] objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.” Which is part of the Mitigation Hierarchy, which does not appear to have been applied to the site selection process. I was concerned of the lack of consultation with Natural England regarding the allocation of Exmo_20, as until the 3rd September 2024 it was not proposed to be allocated (and owing to the fact it failed the HELAA assessment, in accordance with the Site Selection Methodology May 2022,

could never be). A freedom of information request was made to Natural England, who confirmed that they had at no point been consulted regarding Exmo_20 being allocated [attached FOI NE] therefore EDDC have failed with their Duty to Co-operate obligation. Please note that this observation is for one site with one statutory body, so it is possible that non compliance with Section 33A of the PCPA 2004 and Section 18 of the The Town and Country Planning (Local Planning) (England) Regulations 2012 is applicable to multiple site allocations and multiple statutory bodies. On 4th February, despite the HRA published on 30th January stating under 9.9 “there is inherent conflict in that the growth proposed in the Plan would exceed threshold levels and there is, as yet, no means to mitigate or address the risks.”, Ed Freeman advised the SPC councillors that “we are satisfied it can be mitigated”, based on conversations he has had. After the meeting I emailed Ed Freeman to ask for evidence to back up the assertion he gave to the SPC, but he replied stating “I do not intend to respond to these messages or future messages on these matters” [Freeman emails attached]. I feel the SPC were misled by Ed Freeman assertion upon which he has provided no foundation or evidence to substantiate his claim. Furthermore, having a Plan in conflict with the HRA makes it not sound and not lawful and the Plan should not have progressed to Regulation 19 publication stage. The Procedure Guide for Local Plan Examinations states: Section 1. The LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. Procedure Guide for Local Plan Examinations - GOV.UK

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and select sites giving consideration to the mitigation hierarchy.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Resubmitting due to ongoing issues with commonplace: The Regulation 19 Draft Local

plan voted for on 11th December 2024 had no Habitats Regulations Assessment (HRA). This is the plan that was used for the Regulation 19 process, please note that minor amendments were made subsequently and agreed on 3rd February 2025, but the vote on that day was strictly for the amendments, not the Regulation 19 Draft Local plan agreed on 11th December 2024. The HRA was published by Footprint Ecology on 30th January 2025. This HRA stated that the draft Local Plan had an inherent conflict. This needed to be address for the plan not only to be deemed sound but also legally compliant. Clearly as the LPA had agreed to proceed with the Regulation 19 Draft Local plan on 11th December 2024, there was no option to address this, in fact the entire Regulation 19 Draft Local was not informed by the HRA, rather that the LPA expected the HRA to support the Plan, as Matt Dickins states in his email dated 4th December 2024 [Dickins email attached] “We will be having an assessment under the Habitat Regulations produced for us in support of the plan”. Throughout the Local Plan preparation process, EDDC, as the ‘competent authority’ have demonstrated a widespread cavalier attitude, or a fundamental misunderstanding, regarding their obligations under the Conservation of Habitats and Species Regulations. The HRA should have informed the decision making and must not show conflict prior to progressing to Regulation 19 publication. By producing the HRA after agreeing the Regulation 19 Draft Local plan, the LPA have possibly erred in law. The NPPF states “Significant adverse impacts on these [environmental] objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.” Which is part of the Mitigation Hierarchy, which does not appear to have been applied to the site selection process. I was concerned of the lack of consultation with Natural England regarding the allocation of Exmo_20, as until the 3rd September 2024 it was not proposed to be allocated (and owing to the fact it failed the HELAA assessment, in accordance with the Site Selection Methodology May 2022, could never be). A freedom of information request was made to Natural England, who confirmed that they had at no point been consulted regarding Exmo_20 being allocated [attached FOI NE] therefore EDDC have failed with their Duty to Co-operate obligation. Please note that this observation is for one site with one statutory body, so it is possible that non compliance with Section 33A of the PCPA 2004 and Section 18 of the The Town and Country Planning (Local Planning) (England) Regulations 2012 is applicable to multiple site allocations and multiple statutory bodies. On 4th February, despite the HRA published on 30th January stating under 9.9 “there is inherent conflict in that the growth proposed in the Plan would exceed threshold levels and there is, as yet, no means to mitigate or address the risks.”, Ed Freeman advised the SPC councillors that “we are satisfied it can be mitigated”, based on conversations he has had. After the meeting I emailed Ed Freeman to ask for evidence to back up the assertion he gave to the SPC, but he replied stating “I do not intend to respond to these messages or future messages on these matters” [Freeman emails attached]. I feel the SPC were misled by Ed Freeman assertion upon which he has provided no foundation or evidence to

substantiate his claim. Furthermore, having a Plan in conflict with the HRA makes it not sound and not lawful and the Plan should not have progressed to Regulation 19 publication stage. The Procedure Guide for Local Plan Examinations states: Section 1. The LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. Procedure Guide for Local Plan Examinations - GOV.UK

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and select sites giving consideration to the mitigation hierarchy.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Resubmitting due to ongoing issues with commonplace: The Regulation 19 Draft Local plan voted for on 11th December 2024 had no Habitats Regulations Assessment (HRA). This is the plan that was used for the Regulation 19 process, please note that minor amendments were made subsequently and agreed on 3rd February 2025, but the vote on that day was strictly for the amendments, not the Regulation 19 Draft Local plan agreed on 11th December 2024. The HRA was published by Footprint Ecology on 30th January 2025. This HRA stated that the draft Local Plan had an inherent conflict. This needed to be address for the plan not only to be deemed sound but also legally compliant. Clearly as the LPA had agreed to proceed with the Regulation 19 Draft Local plan on 11th December 2024, there was no option to address this, in fact the entire Regulation 19 Draft Local was not informed by the HRA, rather that the LPA expected the HRA to support the Plan, as Matt Dickins states in his email dated 4th December 2024 [Dickins email attached] “We will be having an assessment under the Habitat Regulations produced for us in support of the plan”. Throughout the Local Plan preparation process, EDDC, as the ‘competent authority’ have demonstrated a widespread cavalier attitude, or a fundamental misunderstanding, regarding their

obligations under the Conservation of Habitats and Species Regulations. The HRA should have informed the decision making and must not show conflict prior to progressing to Regulation 19 publication. By producing the HRA after agreeing the Regulation 19 Draft Local plan, the LPA have possibly erred in law. The NPPF states “Significant adverse impacts on these [environmental] objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.” Which is part of the Mitigation Hierarchy, which does not appear to have been applied to the site selection process. I was concerned of the lack of consultation with Natural England regarding the allocation of Exmo_20, as until the 3rd September 2024 it was not proposed to be allocated (and owing to the fact it failed the HELAA assessment, in accordance with the Site Selection Methodology May 2022, could never be). A freedom of information request was made to Natural England, who confirmed that they had at no point been consulted regarding Exmo_20 being allocated [attached FOI NE] therefore EDDC have failed with their Duty to Co-operate obligation. Please note that this observation is for one site with one statutory body, so it is possible that non compliance with Section 33A of the PCPA 2004 and Section 18 of the The Town and Country Planning (Local Planning) (England) Regulations 2012 is applicable to multiple site allocations and multiple statutory bodies. On 4th February, despite the HRA published on 30th January stating under 9.9 “there is inherent conflict in that the growth proposed in the Plan would exceed threshold levels and there is, as yet, no means to mitigate or address the risks.”, Ed Freeman advised the SPC councillors that “we are satisfied it can be mitigated”, based on conversations he has had. After the meeting I emailed Ed Freeman to ask for evidence to back up the assertion he gave to the SPC, but he replied stating “I do not intend to respond to these messages or future messages on these matters” [Freeman emails attached]. I feel the SPC were misled by Ed Freeman assertion upon which he has provided no foundation or evidence to substantiate his claim. Furthermore, having a Plan in conflict with the HRA makes it not sound and not lawful and the Plan should not have progressed to Regulation 19 publication stage. The Procedure Guide for Local Plan Examinations states: Section 1. The LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. Procedure Guide for Local Plan Examinations - GOV.UK

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As EDDC have not demonstrated they understand their duty as the "competent authority" under the Habitats Regulations

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As a local resident I have had no opportunity to object to the proposed allocation. Every consultation and document seen shows Exmo_20 as rejected and not to be allocated, ever since it was deemed “not suitable or achievable” at HELAA stage. This is a breach of the LPA’s duty to co-operate. Under the Town and Country Planning (Local Planning) (England) Regulations 2012, LPAs must engage with relevant stakeholders, including town and parish councils, as part of the Duty to Cooperate and the public consultation process. Key points include:

1. Duty to Cooperate – LPAs must engage with local councils and other statutory bodies in plan-making.
2. Regulation 18 Consultation – Early-stage consultation where town councils can provide input.
3. Regulation 19 Consultation – Formal publication of the draft plan, where the town council can submit representations before it goes to examination. Section 18 of the Regulations state: 18.—(1) A local planning authority must— (a)notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and (b)invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain. (2) The bodies or persons referred to in paragraph (1) are— (a)such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan; (b)such of the general consultation bodies as the local planning authority consider appropriate; and (c)such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

Taking into account that from the main site access point of Exmo_20 the nearest town centre is Budleigh Salterton, the nearest Primary School is in Budleigh Salterton and the nearest doctors is in Budleigh Salterton, I cannot see why EDDC determined that Budleigh Salterton was not “relevant” to the proposed Exmo_20 allocation so did not consult the Town Council. This is a breach of the LPA’s duty to co-operate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure I have a formal opportunity to object to the proposed allocation of Exmo_20, as there has not been no opportunity yet.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Resubmitting due to ongoing issues with commonplace: The three tests of the HELAA are of availability, suitability and achievability. The site was deemed available, however this is a false statement, it was unquestionably not and it appears no checking was undertaken by the LPA to confirm that the 'Call for Site' submission was factually correct. The submission covers two land owners (redacted information), however, the site included multiple properties outside of the submitter's noted ownership and control, none of which have given consent or been notified that their property is included for allocation. The owners of the properties, including the church and multiple privately owned dwellings have confirmed their property is not available. This false claim of availability was raised by an owner, Mr Winn, in August 2022 [emails attached] and not addressed, and I raised this after the site was allocated on 3rd September 2024 (notably with EDDC stating no reconsideration of allocated sites permitted). Matt Dickins (EDDC Planning Policy) confirmed by email to me [attached] that no ownership checks were done prior to the vote to allocate, stating: "The large numbers of paper that have been going to committee have been prepared over several weeks and have drawn on data and information that has been logged in records over a longer period. We lack the resources to scrutinise every record in full detail and up to a point have to rely on third party submissions. Site 20, in total, was favoured by committee as a potential allocation, rather than being an officer recommendation, and as such we as officers, until committee endorsement, had not explicitly examined all site aspects in full detail, rather we were drawing on information held in records. We do not have signed papers from all landowners that they all wish to bring development forward, rather we are working on the basis that Eagle Investments (or under subsidiary or partner company or organisation names and their agents) are acting for and on behalf of all landowners."

This confirms that the HELAA process relating to ‘availability’ is unjustified and of no merit and the LPA have displayed a cavalier attitude to checking availability, contrary to the HELAA methodology 5.16. The conclusion of HELAA for Exmo_20 should have been “not available, not suitable & not achievable.”

It is worth noting that the SPC councillors on 3rd September 2024 were evidently attracted by the apparent size of this site shown on the map to deliver significant housing numbers, again demonstrating how the incorrect information provided by the Planning Policy team was misleading. The Planning Policy team knew that the site was not available [Mr Winn’s email dated 14.08.22 attached], yet presented it that it was, this is unlawful.

The site as shown on p.326 of the February 2025 Publication draft Local Plan Sustainability Appraisal shows the Exmo_20 site which is evidently not available, for the LPA to present it as available is unsound and unlawful.

The LPA failed in its duty to co-operate, as by EDDC considering and allocating this site, there were relevant stakeholders, such as Mr Winn, that were at no point made aware that their land has been allocated and still to date have not been consulted or notified.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site allocation Exmo_20 must be removed from the Local Plan and sites that were stated as preferred in the agenda of the 3rd September 2024 Strategic Planning Committee meeting allocated as alternative sites.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

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not available [Mr Winn's email dated 14.08.22 attached], yet presented it that it was, this is unlawful.

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The LPA failed in its duty to co-operate, as by EDDC considering and allocating this site, there were relevant stakeholders, such as Mr Winn, that were at no point made aware that their land has been allocated and still to date have not been consulted or notified.

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4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Resubmitting due to ongoing issues with commonplace: The three tests of the HELAA are of availability, suitability and achievability. The site was deemed available, however this is a false statement, it was unquestionably not and it appears no checking was undertaken by the LPA to confirm that the 'Call for Site' submission was factually correct. The submission covers two land owners (redacted information), however, the site included multiple properties outside of the submitter's

noted ownership and control, none of which have given consent or been notified that their property is included for allocation. The owners of the properties, including the church and multiple privately owned dwellings have confirmed their property is not available. This false claim of availability was raised by an owner, Mr Winn, in August 2022 [emails attached] and not addressed, and I raised this after the site was allocated on 3rd September 2024 (notably with EDDC stating no reconsideration of allocated sites permitted). Matt Dickins (EDDC Planning Policy) confirmed by email to me [attached] that no ownership checks were done prior to the vote to allocate, stating: “The large numbers of paper that have been going to committee have been prepared over several weeks and have drawn on data and information that has been logged in records over a longer period. We lack the resources to scrutinise every record in full detail and up to a point have to rely on third party submissions. Site 20, in total, was favoured by committee as a potential allocation, rather than being an officer recommendation, and as such we as officers, until committee endorsement, had not explicitly examined all site aspects in full detail, rather we were drawing on information held in records. We do not have signed papers from all landowners that they all wish to bring development forward, rather we are working on the basis that Eagle Investments (or under subsidiary or partner company or organisation names and their agents) are acting for and on behalf of all landowners.”

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The site as shown on p.326 of the February 2025 Publication draft Local Plan Sustainability Appraisal shows the Exmo_20 site which is evidently not available, for the LPA to present it as available is unsound and unlawful.

The LPA failed in its duty to co-operate, as by EDDC considering and allocating this site, there were relevant stakeholders, such as Mr Winn, that were at no point made aware that their land has been allocated and still to date have not been consulted or notified.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure shortcomings in the HELAA process are given due consideration.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Submitting again due to ongoing Commonplace issues: EDDC have tried to change the Site Selection Methodology (SSM) to justify Exmo_20. The SSM dated May 2022 is the one used for the Regulation 18 process [attached]. After 11th December 2024 (the date the draft local plan was approved to proceed to regulation 19 publication) this was amended and this December 2024 amended version put in the evidence library for the Regulation 19 consultation. The original May 2022 version, used for the Regulation 18 stage, has wording that does not allow Exmo_20 to be selected. Extracts below:

- Stage 2: Site Sifting 1.8 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further. Only sites which meet criteria a), b) and c) are carried forward to Stage 3. These criteria are shown in figure 2 below.
- criteria a) Site is assessed as ‘suitable, available and achievable’ in the HELAA6
- Subtext point 6 states: It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but, if not, such sites should be sifted out at Stage 2. The revised December 2024 version, not used but presented in the evidence library (the only version present), has been amended to ensure the Site Selection Methodology evidence document does not show conflict with the Reg19 draft Local Plan, specifically the Exmo_20 allocation.

Revised December 2024 version amendments noted:

- Stage 2: Site Sifting 1.7 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further (see figure 2). Only sites which meet criteria a), b) and c) are carried forward to Stage 3. In exceptional circumstances, sites may continue to Stage 3 even if

they fail to meet the sifting criteria – such cases will be clearly justified. This could include potential gypsy and traveller site allocations, which are often located in the countryside. Similarly, some sites may pass the site sifting criteria but may not be considered a ‘reasonable alternative’ for other reasons and therefore should not be assessed at Stage 3 – again, this will need to be clearly justified on a site-specific basis.

- Subtext point 6 from May 2022 version deleted.

As the HELAA methodology is a key early stage of plan development based on broad planning policy context derived from the NPPF, to insert a clause that trumps the HELAA conclusions in essence is a clause to trump the NPPF. Therefore sites, such as Exmo_20 that were deemed “not suitable or achievable” in the HELAA process but are now allocated, cannot be considered ‘justified’, ‘effective’ or ‘consistent with national policy’ and the Plan is therefore not sound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the site allocations and select alternatives from those shown as preferred in the agenda for 3rd September 2024 Strategic Planning Committee meeting.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand how a site that is not suitable or achievable for development (HELAA) can be considered to be able to deliver significant levels of development, as to date the LPA have not demonstrated how this contradiction will be overcome.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The allocation of Exmo_20 with SD01 is unsound & not legally compliant and the LPA failed in their duty to co-operate in the process of allocating this site.

Firstly, Exmo_20 was deemed available but not suitable or achievable in the HELAA process, as shown in HELAA Appendix E(v)1. On 3rd September this site was selected as allocated by the Strategic Planning Committee, despite the fact that there was no justifiable way, based on the May '22 Site Selection Methodology (attached) it could be. The Draft Local Plan was approved to progress to Regulation 19 consultation stage by the Strategic Planning Committee on 11th December 2024 with Exmo_20 allocated.

At some in December, after the publication of the new NPPF on 12th December, the Site Selection Methodology and this December 2024 version that is loaded into the Evidence Library as the "Site Selection Methodology", with no mention of the one that was used for the Regulation 18 stage. There appears to be no formal discussion or approval process for the revised "Site selection Methodology" and it appears that the supporting evidence has been altered to suit the draft Local Plan, which would be unlawful. The original May '22 version, used for the Regulation 18 stage, has wording that does not allow Exmo_20 to be selected. Extracts below:

- Stage 2: Site Sifting 1.8 Following the 'long list' of sites identified in Stage 1, a 'sifting' process will be carried out to ensure that only 'reasonable alternatives' are considered further. Only sites which meet criteria a), b) and c) are carried forward to Stage 3. These criteria are shown in figure 2 below.
- criteria a) Site is assessed as 'suitable, available and achievable' in the HELAA6

- Subtext point 6 states: It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but, if not, such sites should be sifted out at Stage 2. The revised Dec24 version, not used but presented in the evidence library (the only version present), has been amended to ensure the Site Selection Methodology evidence document does not show conflict with the Reg19 draft Local Plan, specifically the Exmo_20 allocation.

Revised Dec24 version amendments noted:

- Stage 2: Site Sifting 1.7 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further (see figure 2). Only sites which meet criteria a), b) and c) are carried forward to Stage 3. In exceptional circumstances, sites may continue to Stage 3 even if they fail to meet the sifting criteria – such cases will be clearly justified. This could include potential gypsy and traveller site allocations, which are often located in the countryside. Similarly, some sites may pass the site sifting criteria but may not be considered a ‘reasonable alternative’ for other reasons and therefore should not be assessed at Stage 3 – again, this will need to be clearly justified on a site-specific basis.
- Subtext point 6 from May22 version deleted. Furthermore, the Sustainability Appraisal is incorrect and misleading, stating that Exmo_20 was deemed “Available, suitable & achievable” in the HELAA process. The Site Selection Report - Exmouth (February 2025) omits Exmo_20 from the paragraph 1.7 list of site which did not pass site sifting. This report summarises "to pass site sifting and therefore be considered as a potential allocation, the site should be identified as suitable, available, achievable in the HELAA".

Because the site failed site sifting and was not preferred or alternative/second choice, it missed significant consideration or consultation through the Regulation 18 stage therefore the LPA failed in their duty to co-operate in the process of allocating this site.

With the above in mind, it is clear that decision makers, such as the SPC could have been misinformed, relying on incorrect information to form opinions, such that their judgement was unjustified and therefore unsound. Amending supporting evidence documents is unlawful.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the allocation of Exmo_20 from the Local Plan. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 with SD01 is unsound & not legally compliant and the LPA failed in their duty to co-operate in the process of allocating this site.

Firstly, Exmo_20 was deemed available but not suitable or achievable in the HELAA process, as shown in HELAA Appendix E(v)1. On 3rd September this site was selected as allocated by the Strategic Planning Committee, despite the fact that there was no justifiable way, based on the May '22 Site Selection Methodology (attached) it could be. The Draft Local Plan was approved to progress to Regulation 19 consultation stage by the Strategic Planning Committee on 11th December 2024 with Exmo_20 allocated.

At some in December, after the publication of the new NPPF on 12th December, the Site Selection Methodology and this December 2024 version that is loaded into the Evidence Library as the “Site Selection Methodology”, with no mention of the one that was used for the Regulation 18 stage. There appears to be no formal discussion or approval process for the revised “Site selection Methodology” and it appears that the supporting evidence has been altered to suit the draft Local Plan, which would be unlawful. The original May '22 version, used for the Regulation 18 stage, has wording that does not allow Exmo_20 to be selected. Extracts below:

- Stage 2: Site Sifting 1.8 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further. Only sites which meet criteria a), b) and c) are carried forward to Stage 3. These criteria are shown in figure 2 below.
- criteria a) Site is assessed as ‘suitable, available and achievable’ in the HELAA6
- Subtext point 6 states: It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but, if not, such sites should be sifted out at Stage 2. The revised Dec24 version, not used but presented in the evidence library (the only version present), has been amended to ensure the Site

Selection Methodology evidence document does not show conflict with the Reg19 draft Local Plan, specifically the Exmo_20 allocation.

Revised Dec24 version amendments noted:

- Stage 2: Site Sifting 1.7 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further (see figure 2). Only sites which meet criteria a), b) and c) are carried forward to Stage 3. In exceptional circumstances, sites may continue to Stage 3 even if they fail to meet the sifting criteria – such cases will be clearly justified. This could include potential gypsy and traveller site allocations, which are often located in the countryside. Similarly, some sites may pass the site sifting criteria but may not be considered a ‘reasonable alternative’ for other reasons and therefore should not be assessed at Stage 3 – again, this will need to be clearly justified on a site-specific basis.
- Subtext point 6 from May22 version deleted. Furthermore, the Sustainability Appraisal is incorrect and misleading, stating that Exmo_20 was deemed “Available, suitable & achievable” in the HELAA process. The Site Selection Report - Exmouth (February 2025) omits Exmo_20 from the paragraph 1.7 list of site which did not pass site sifting. This report summarises "to pass site sifting and therefore be considered as a potential allocation, the site should be identified as suitable, available, achievable in the HELAA".

Because the site failed site sifting and was not preferred or alternative/second choice, it missed significant consideration or consultation through the Regulation 18 stage therefore the LPA failed in their duty to co-operate in the process of allocating this site.

With the above in mind, it is clear that decision makers, such as the SPC could have been misinformed, relying on incorrect information to form opinions, such that their judgement was unjustified and therefore unsound. Amending supporting evidence documents is unlawful.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the allocation of Exmo_20 from the Local Plan. Other sites, shown as preferred within the

Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The allocation of Exmo_20 with SD01 is unsound & not legally compliant and the LPA failed in their duty to co-operate in the process of allocating this site.

Firstly, Exmo_20 was deemed available but not suitable or achievable in the HELAA process, as shown in HELAA Appendix E(v)1. On 3rd September this site was selected as allocated by the Strategic Planning Committee, despite the fact that there was no justifiable way, based on the May '22 Site Selection Methodology (attached) it could be. The Draft Local Plan was approved to progress to Regulation 19 consultation stage by the Strategic Planning Committee on 11th December 2024 with Exmo_20 allocated.

At some in December, after the publication of the new NPPF on 12th December, the Site Selection Methodology and this December 2024 version that is loaded into the Evidence Library as the “Site Selection Methodology”, with no mention of the one that was used for the Regulation 18 stage. There appears to be no formal discussion or approval process for the revised “Site selection Methodology” and it appears that the supporting evidence has been altered to suit the draft Local Plan, which would be unlawful. The original May '22 version, used for the Regulation 18 stage, has wording that does not allow Exmo_20 to be selected. Extracts below:

- Stage 2: Site Sifting 1.8 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further. Only sites which meet criteria a), b) and c) are carried forward to Stage 3. These criteria are shown in figure 2 below.
- criteria a) Site is assessed as ‘suitable, available and achievable’ in the HELAA6
- Subtext point 6 states: It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but, if not, such sites should be sifted out at Stage 2. The revised Dec24 version, not used but presented in the evidence library (the only version present), has been amended to ensure the Site Selection Methodology evidence document does not show conflict with the Reg19 draft Local Plan, specifically the Exmo_20 allocation.

Revised Dec24 version amendments noted:

- Stage 2: Site Sifting 1.7 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further (see figure 2). Only sites which meet criteria a), b) and c) are carried forward to Stage 3. In exceptional circumstances, sites may continue to Stage 3 even if they fail to meet the sifting criteria – such cases will be clearly justified. This could include potential gypsy and traveller site allocations, which are often located in the countryside. Similarly, some sites may pass the site sifting criteria but may not be considered a ‘reasonable alternative’ for other reasons and therefore should not be assessed at Stage 3 – again, this will need to be clearly justified on a site-specific basis.
- Subtext point 6 from May22 version deleted. Furthermore, the Sustainability Appraisal is incorrect and misleading, stating that Exmo_20 was deemed “Available, suitable & achievable” in the HELAA process. The Site Selection Report - Exmouth (February 2025) omits Exmo_20 from the paragraph 1.7 list of site which did not pass site sifting. This report summarises "to pass site sifting and therefore be considered as a potential allocation, the site should be identified as suitable, available, achievable in the HELAA".

Because the site failed site sifting and was not preferred or alternative/second choice, it missed significant consideration or consultation through the Regulation 18 stage therefore the LPA failed in their duty to co-operate in the process of allocating this site.

With the above in mind, it is clear that decision makers, such as the SPC could have been misinformed, relying on incorrect information to form opinions, such that their judgement was unjustified and therefore unsound. Amending supporting evidence documents is unlawful.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure the unreasonable behaviour of the LPA is adequately considered.

Full name: Thomas Shillitoe

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: On p.340 it states “Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:

- Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment, though for areas of Exmo_04 and 20 within 400 metres of the Pebblebed Heaths mitigation would not be seen as possible. Exmo_04 can be amended to exclude the most sensitive area, resulting in Exmo_04a.”

Why is it only Exmo_04 that can be amended? It’s inconsistent and therefore not justified. The site allocation and the settlement boundary must be repositioned 400 metres from the Pebblebed Heaths.

On page 342 Exmo_20 is listed as a preferred alternative for Exmouth, yet as it failed HELAA being deemed “not suitable or achievable”, in accordance with the 2.4 of this Sustainability Appraisal report, it cannot be a preferred alternative. The document is inconsistent, not justified and therefore not sound.

On p.343 the reason for rejecting sites lists: Exmo_04b – Land at Marley Drive is rejected due to major adverse biodiversity effect arising from its location within 400 metre Pebblebed Heaths exclusion zone. This is inconsistent with the Exmo_20 allocation and therefore not justified and not sound. The site allocation and the settlement boundary must be repositioned 400 metres from the Pebblebed Heaths.

Full name: Thomas Shillitoe

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: In the Exmouth Sites climate change adaption commentary (p.336), there is no mention Exmo_20 having flood risk at the lowest end of the site. Nor is it mentioned that this large greenfield area entirely drains into Withycombe Brook, which has significant identified flood risk in Exmouth and has not been assessed in the Strategic Flood Risk Assessment of this draft Local Plan [EDDC Level 1 Strategic Flood Risk Assessment – Final Report February 2024 p.69 states “This table does not provide information on all Main Rivers in East Devon. Other Main Rivers within East Devon are: Grindle Brook, Wotton Brook, Withycombe Brook, Budleigh Brook, Back Brook, Snod Brook, The Gissage and Woodhayne Range.”]. Considering the existing conditions, that the Brook runs through the centre of the largest settlement in East Devon, and the substantial size of the proposed Exmo_20 allocation upstream, this is unjustified.

In the Exmouth Sites access to services commentary (p.338), a figure of 1,600 metres is used, this should be 800m as the 1600m is total trip ‘there and back’ [All links reference on p.186 of the Local Plan are broken/out of date but the Government’s National Design Guide does states 800m. “Sustran, Walkable neighbourhoods” also states 800m as standard walkable distance and 1600m total trip]. Distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. As the main site access point is now out onto the B3179 country road, this should be a material consideration in this section. Using the 1,600 metre figure is unjustified.

In the Exmouth Sites connectivity and transport commentary (p.340), It is claimed that Exmo_20 is within 800m of the A376, this is not true, therefore unjustified. Also of note is that distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. As the main site access point is now out onto the B3179 country road, this should be a material consideration in this section.

Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Full name: Thomas Shillitoe

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: In the Exmouth Sites Biodiversity objective on (p.331/332), two sites, Exmo_04 and Exmo_20 score double negative (--). The commentary and conclusions between the two sites are inconsistent and unjustified. Exmo_04 results in part allocation outside of the 400m yet Exmo_20's allocation runs right up to be adjacent to the protected site.

In the Exmouth Sites Hist. built env. commentary (p.334), the large size of the site is assumed to enable the adverse impacts to have a minor negative effect. Firstly the site has significantly shrunk since the ownership was actually checked after allocation on 3rd September 2024, secondly the top 400m of the site cannot accommodate housing and thirdly it is the size required to accommodate 700 houses, therefore I do not believe an assumption that mitigation can be incorporated is sufficient justification.

In the Exmouth Sites climate change carbon emissions commentary (p.335), a figure of 1,600 metres is used, this should be 800m as the 1600m is total trip 'there and back' [All links reference on p.186 of the Local Plan are broken/out of date but the Government's National Design Guide does states 800m. "Sustran, Walkable neighbourhoods" also states 800m as standard walkable distance and 1600m total trip]. Distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. As the main site access point is now out onto the B3179 country road, this should be a material consideration in this section. This site is not in a sustainable location and its allocation is therefore not consistent with national policy.

Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: Sustran walkable-neighbourhoods.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743212983/projects/6734d674023a1f95dd0a926c/respondent-upload/jksvegsejufdq6g5k5qt.pdf>

Full name: Thomas Shillitoe

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.:

On page 18, figure 2.4: Site criteria to be considered as a 'reasonable alternative' confirms that Exmo_20 cannot be a reasonable alternative as it failed the HELAA stage being deemed "not suitable or achievable" (HELAA Appendix E(v)1). Its allocation is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).:

appendix-e-v-1-available-not-suitable-or-achievable-housing-sites.pdf: [https://res.cloudinary.com/commonplace-](https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743211873/projects/6734d674023a1f95dd0a926c/respondent-upload/qf7mynx6kedotcqu7mj.pdf)

[digital-limited/image/upload/v1743211873/projects/6734d674023a1f95dd0a926c/respondent-upload/qf7mynx6kedotcqu7mj.pdf](https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743211873/projects/6734d674023a1f95dd0a926c/respondent-upload/qf7mynx6kedotcqu7mj.pdf)

Full name: Thomas Shillitoe

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.:

Figure 2.2 (p.11) states “1. Biodiversity: to conserve and enhance the habitat and wildlife of our natural environment. Natural habitats and biodiversity; flora and fauna Ensure current, and potential future, habitat connectivity is not compromised”. Allocation of Exmo_20, a supporting habitat for foraging Nightjars would be contrary to this, furthermore Exmo_20 is located on the SNA 368 which is being allocated as a site with the Devon Local Nature Recovery Network (LNRS) as required by the Environment Act 2021, so allocation would be in conflict with this strategy of conserving and enhancing the habitat and wildlife of our natural environment. This is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

On page 11/12 it states “4. Climate change and carbon emissions. Development that minimises the need to travel by providing access to public transport, cycle.” Allocation of Exmo_20 would not minimise the need to travel, as it is in an unsustainable location with the main site access point now out onto the B3179 country road. Allocation of this site is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Full name: Thomas Shillitoe

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.:

The Sustainability Appraisal Framework should make reference to the Mitigation Hierarchy which prioritises avoidance over mitigation. This is the structured approach to managing environmental impacts embedded in several key pieces of legislation. Some of the most relevant include:

1. The Environmental Impact Assessment (EIA) Regulations (2017)
2. The Environment Act 2021
3. The National Planning Policy Framework (NPPF)
4. The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations)
5. Defra's Biodiversity Metric and Biodiversity Net Gain Guidance To not implement this in the site selection methodology or process is not consistent with national policy and therefore not sound. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Grant Shipcott

Full name: Grant Shipcott

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As a resident of Exmouth I have strong objections to the proposal to build over 400 houses on the eastern edge of Exmouth. Firstly the area is protected by National Landscape status, being truly an area of outstanding beauty, and its expedient acquisition will be greatly regretted. Secondly, there is already inadequate infrastructure for a growing town which is notorious for its overwhelmed sewage system and single-carriageway road from the M5. My chief concern however is that, if the development is primarily aimed at addressing the housing problem, it will fail in this intention because the location in AONB/NL land will inevitably attract "high-end" buyers who will require appropriately sized and equipped properties. Is the "housing problem" connected to £500k+ buyers? No, I don't believe it is - it's about lower-income families and 1st-time buyers who could never aspire to own a property such as the ones which EDDC plan to have built on this prime green space. This whole shameful proposal will do nothing for the most needy families. It may be remembered more as a cash grab by Clinton Estates, who must have rubbed their hands with glee when they heard about the plan.

C Shipton

Full name: C Shipton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (high street, doctors, school, existing SEWAGE FAILURES) would be the preferred choice of Exmo_20 residents. This undermines the settlement hierarchy and would lead to the coalescence of Budleigh & Exmouth contrary to POLICY OL05 of the local plan.

Full name: C Shipton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

Karen Sims

Full name: Karen Sims

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Chris Sims

Full name: Chris Sims

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sally Sinclair

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. Water containment at Goodmoores already proving ineffective.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, (as has already happened with Topsham and the Exeter suburbs)with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship and contemplation which currently exists for the congregation.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be severely impacted by the development of Exmo_20.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network,

part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could completely undermine the conservation objectives of the SPA.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out increased pollution and adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not a 'modest' nor in the least sensitive development. It is a 'comprehensive development scheme' within a rural part of East Devon.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard, with a high vehicular accident rate.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has; which is detrimental to a town reliant on visitors in the summer.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles thereby emitting more co2.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion and hardship.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179, which is quite narrow and consistently breaking up with the present traffic load) to access them within Exmouth or neighbouring settlements

Full name: Sally Sinclair

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5. Development in the Towns and Villages

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 in my opinion is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

GORDON SINCLAIR

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

Full name: GORDON SINCLAIR

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5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycomb, where the water level has risen significantly over the last few years due to already increased building at the top of Dinan Way with no effective run-off.

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Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths, leading to a significant erosion of our habitat.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. Parking in Budleigh Salterton is already at a premium.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation and the deer that visit the graveyard. (POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings).

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network,

part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA).

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon, and certainly not sensitive in anyway.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard, the B3179 probably one of the worst maintained roads in the county.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has, with raw sewage being tankered hourly for many weeks only a few months ago.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

vALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few and mainly for pleasure or exercise not to convey goods. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide the necessary key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast with only two roads in and out. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development on the EXMO20 site will be a long distance from the town such that it is an unsustainable location.

Ellen Singleton-Wood

Full name: Ellen Singleton-Wood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Introduction This development would destroy the natural beauty of the approach to Budleigh with its extensive views across the fields to the sea. It would impact on nature in the surroundings areas - nesting nightjars at Pebble bed heaths; noise and light pollution at our beautiful Bystock ponds and heathland. We are supposed to be giving nature a chance not destroying it further. Infill and use brown field sites - build homes for essential workers within existing communities where people can walk and cycle to local facilities.

Objections with reasons

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan. ? An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. ?

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site contrary to paragraph 13.9

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the “tranquility, wildness and dark skies”, which is contrary to POLICY OL01. ? Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA. ? Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I consider this planning to be contrary to the character of East Devon and shows lack of knowledge and expertise from those on the planning committee.

Peter David Sinton

Full name: Peter David Sinton

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.:

Para 7.9 states that CCMA's are not necessary where there is a shoreline Management Plan to 'hold the line' . There is a plan which includes measures relating to the beach adjoining the Cliff Road area of the Map which may 'hold the line' but could and should be modified to 'hold the line.' permanently.

2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The CCMA policy is premature and based on highly suspect academic studies encouraged by Natural England to destroy our precious cliffs. They have no National or Local Democratic Mandate and should be ignored by our locally elected Authorities. As the country is still a member of the European Court of Human Rights the issuing of a CCMA blights the value of all properties within it and as such breaches the residents human rights.

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: The loss of any of the cliff is entirely and cheaply preventable even by natural means. If the 'experts' study the cliffs between Shaldon and Babbacombe they will see large sandstone boulders at the base of the cliffs that have prevented erosion from even severe Easterly winter storms. Here the problem is that our Sandstone is friable and when slabs of it fall due to undermining , it breaks into small pieces which quickly get washed away .Then

the base of the cliff continues to be undermined by wave action and shingle impact. There are plenty of local sites where more durable sandstone could be obtained to place a natural looking line of large boulders at the base of the cliff. Alternatively a Sandstone coloured concrete and sandstone aggregate could be used . The current cost of a cubic metre of this would be less than £130 and as such each house could be protected by say 20 large natural looking pre-cast boulders at a material cost less than £10000. In conjunction with the already planned groyne and shingle recharge this would satisfy clause 7.9 and render the CCMA unnecessary . Better still would be a narrow cast in-situ reinforced concrete strip similar to that around Jacob's Ladder and which could hardly be considered an eyesore by normal people. Every seaside town has such works and again render the CCMA unnecessary.

3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: Abandon issuing the CCMA and improve the Beach Defence scheme to permanently 'hold the line' for the benefit of all local people .

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Adapting to Climate Change chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Yes but shouldn't . Locally elected Authorities should operate to carry out the wishes of their electorate not those of unelected and unrepresentative Bodies such as Natural England.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The views of local people are not being supported or even considered by Councillors or Councils.

Cheryl Skeggs

Full name: Cheryl Skeggs

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17

Sarah Carolyn Skerratt

Full name: Sarah Carolyn Skerratt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Too far from all services. No public transport nearby so increased use of cars because hilly and E.D. population is older than many places.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Inadequate infrastructure, medical services, schools, public transport, sewage

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It will permanently damage the countryside including the Pebblebed Heaths which have rare species i.e. nightjars. There are supposed to be connecting wildlife corridors and these are already being built over. Extra lights at night will be harmful, i.e. car headlights. Mature trees hedgerows etc will be permanently damaged and not quickly replaced. One settlement is not supposed to be joined to another and Exmouth and Budleigh Salterton will be. Roads are already congested and this will make it much worse. Medical services are already overstretched, schools are not adequate, there will be greater flood risk and the sewage disposal is already poor and not easily improved.. There has been a lack of consultation and I think this is not legally compliant.

Mr Julian Clive Sleeman

Full name: Mr Julian Clive Sleeman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo20 Will cause harm to heritage assets including St John in the Wilderness a grade 2 listed church eroding the purpose of this site. Exmo20 will have a detrimental effect on the Pebble bed heathland, also in contrary to Policy OL01 and strategic nature area 368. Development of Exmo20 on heavy clay sub soil will exacerbate downstream flood risk via Withycombe brook which is already beyond its design capacity therefore in conflict with policy AR01B. There is no capacity to cope with extra run off water and sewage, until these points are in place there should be no further planning applications passed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the local plan, site should not have access via B3179 or southern wood as neither options could cope with higher levels of traffic in particular around rush hour traffic.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Andrew Sly

Full name: Andrew Sly

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

4.1

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: It's not sound because local residents are having to suffer because of the increased traffic, disruption & at the moment the roads cannot cope at peak times.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Cancel the redevelopments as the community will be over saturated.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There are too many homes being built & the infrastructure cannot cope-sewage & water.

Mr Graham Smith

Full name: Mr Graham Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the

Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment

area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying

land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key

services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is

contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

MR ANTHONY SMITH

Full name: MR ANTHONY SMITH

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Kerin Smith

Full name: Kerin Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: *

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

* The Habitats Regulations assessment (30.01.25) confirms that there is?"currently not sufficient certainty to rule out adverse effects in integrity in relation to... air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

* Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. * Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use

walking or cycling as their choice of transport. This is contrary to POLICY TRO1. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: * Remove Exmo_20 from the Local Plan * Reduce the size of Exmo_20 * Do not access the site via the B3179 * Do not access the site via Southern Wood * Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Stephen Bower Smith

Full name: Stephen Bower Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

...Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

...Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

...Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE 02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

...Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

...The main access point to Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Diana smith

Full name: Diana smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach, parking etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary TO POLICY OL05 of the Local Plan. It would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. Residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6 and too far and too steep from any town centre to walk or cycle to. Contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

David Smith

Full name: David Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less harm to the pebbled Heaths (SAC/SPA). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the tranquillity, wildness and dark skies of the countryside contrary to Policy OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species, and rich hedgerows across the site, contrary to Paragraph 13.9. The Habitats Regulations assessment (30/01/25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to.....air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with Policy OL09 and Policy PB04. Exmo_20 would have significant adverse effects on St. John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship for the congregation. This is contrary to Policy HE02. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with Policy AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion in conflict with Paragraph 11.2. It is an unsustainable development requiring the local population to travel much further than 800m to existing key services and facilities contrary to Paragraph 11.6. It is too far (and too steep) from any town centre for people to choose to walk or cycle. This is contrary to Policy TR01. The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Surgery, School, beach etc.) would be the

obvious choisce for the residents of Exmo_20. This would lead to progressive merging of Budleigh with Exmouth, contrary to Policy OL05 of the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MR ANTHONY SMITH

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. * The Habitats Regulations assessment (30.01.25) confirms that there is?"currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Hannah Smith

Full name: Hannah Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

The sewage infrastructure in Exmouth is not fit for purpose as it is. In 2024, there were 65 pollution incidents into the sea at Exmouth. Adding more houses to an already overloaded system would only exacerbate this.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Julia VAughan Smith

Full name: Julia VAughan Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: What is proposed is a huge development and the infrastructure is just not there to support it - the sewage outflow in this area is dreadful, they have been adding chlorine to the water for weeks as obviously the treatment plants can't cope; schools and GP surgeries are under intense pressure already - where is the funding for extra services in these and others essential to support such a big community. And, the impact of traffic on the road will be dreadful, it is already full of potholes, it will become very congested. Is there enough jobs for everyone to do and will people be using cars a lot to get to places of work adding to the carbon pollution or will there be additional public bus services - if there aren't this is unsustainable. Overall I consider this plan totally unsustainable. It is all about the infrastructure and I don't see this considered. Also there is the risk to heritage assets in St John and is in conflict with the Strategic Nature Area 368, and Policies OL09 and PB04. Overall this is a very damaging plan.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: REmove Exmo_20 from the Local Plan or seriously reduce its size by a considerable amount. Find other ways of accessing the site

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: see Above

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I want to know that proper consideration is being given to these serious objections.

A.R. Smith

Full name: A.R. Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I believe there are many reasons why the emerging local plan sites Seat_02, Seat_03 and Seat_05 should be deleted as candidate development sites. I therefore set out reasons why Seaton is totally unsuitable for consideration for any further housing development. The proposal to include three new development sites on the town's Green Wedges conflict with the following policies:

Strategic Policy OL01: Landscape features: East Devon's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute to the character of East Devon's landscapes, in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located.

Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty): The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon: Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant). Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest.

Strategy 46 of the currently adopted local plan gives general protection for landscapes of value. We are surrounded by the East Devon AONB which forms the setting for sites Seat_03 and Seat_05.

Policy OL05: Green wedges Within green wedges..... development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.

Paragraphs 142 to 144 of the National Planning Policy Framework (NPPF) address the protection of Green Belt Land, and Green Wedges have been interpreted to be included under this definition. Green Belt/Wedges are defined as serving the following purposes:

a) To check unrestricted sprawl of large built-up areas. b) To prevent neighbouring towns from merging into one another. c) To assist in safeguarding the countryside from encroachment. d) To preserve the setting and special character of historic towns, and. e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Of these at least a), b), and d) are applicable to Seat_05 because it is a buffer between Seaton and the Ancient Borough of Colyford.

The adopted plan in 2013 stated : ‘community facilities, school, health, social and cultural are seen as borderline or inadequate with no capacity to serve additional residents’.

The 2025 the emerging plan now states that ‘Seaton has a wide range of community facilities, with a variety of shops, sports facilities, a library, GP, Hospital, and regular bus services around the settlement’.

With reference to the adopted plan quotation, the emerging plan statement is clearly untrue and needs amending. These facilities have reduced considerably since 2013, e.g. closure of hospital in-patient beds.

There is also a threat to Seaton Wetlands. This is a very precious asset to Seaton where numbers of visitors have increased exponentially since it opened, and must be preserved at all costs. These sites all fall within the corridor for bat migration and foraging between the Beer Quarry caves and Seaton Wetlands and development will compromise their continued occupation of the Seaton area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe the key to protecting Seaton from unsustainable and inappropriate development which will threaten so much of Seaton's way of life and future is to remove sites Seat_02, Seat_03 and Seat_05 from the emerging Local Plan.

I believe that the site at Harepath Road that has been allocated for mixed use Industrial/recreation should also be removed from the emerging plan and returned to the Green Wedge so that the town can build on all the work that has been put in during that time into developing Seaton as a 'destination for Green Tourism'. Removal of this site would also ensure that any future retail/employment is based closer to the town centre to support it and therefore meet strategy SE06.

I therefore request that the above mentioned sites be removed as potential development sites from the emerging Local Plan and return to Green Wedge status and that the Built-up Boundary be restored to that in the adopted 2013 plan.

Diane Smith

Full name: Diane Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are many reasons why the emerging local plan sites Seat_02, Seat_03 and Seat_05 should be deleted as candidate development sites. I therefore set out reasons why Seaton is totally unsuitable for consideration for any further housing development. I would like to start with infrastructure. Vitally important is the insufficient, infrastructure to support development of these sites. We have an old sewage system that would come under severe pressure. Local schools are full which begs the question of how far children would have to travel to fulfil their education. I discussed the potential for development of these sites with a local Medical Practice recently who have confirmed that, I quote - 'the Practice could not manage with present resources' should further housing development go ahead. Taking into account developments presently under construction at the Waterfront (30 properties), Seaton Quay (90 properties) and 72 houses under construction in Colyton, the GP Service position will be further exacerbated and will cause further disruption to an already stretched health service. We all know from recent news that Dental Services throughout the West of England are in crisis such that very few people are able to access NHS Dental care. There are few places left for the air ambulance to land and it is well to note this area is used as a landing area in an emergency, and has been used twice in the last few weeks. The adopted plan in 2013 stated : 'community facilities, school, health, social and cultural are seen as borderline or inadequate with no capacity to serve additional residents'. Despite these facilities having reduced considerably since 2013, in 2025 the emerging plan now states that 'Seaton has a wide range of community facilities, with a variety of shops, sports facilities, a library, GP, Hospital, and regular bus services around the settlement'. With reference to the first quotation of this paragraph this second statement is clearly untrue and needs amending. I emailed Richard Foord about my deep concerns regarding this development – I quote his reply of 15/8/24 'Your email

raises very important points specific to that site, but also about development in general. Broadly speaking, I am in favour of more homes – as they are so desperately needed - but at the correct price point and on appropriate sites. Building for profit, with no real appreciation or action regarding infrastructure is clearly wrong. Flooding is a factor that must always be given serious consideration now'. End quote There is also a threat to Seaton Wetlands. This is a very precious asset to Seaton where numbers of visitors have increased exponentially since it opened, and must be preserved at all costs. The disruption caused both during and after development would have an enormous impact on the wildlife at this very important site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

I believe the key to protecting Seaton from unsustainable and inappropriate development which will threaten so much of Seaton's way of life and future is to remove sites Seat_02, Seat_03 and Seat_05 from the emerging Local Plan. I believe that the site at Harepath Road that has been allocated for mixed use Industrial/recreation should also be removed from the emerging plan and returned to the Green Wedge so that the town can build on all the work that has been put in during that time into developing Seaton as a 'destination for Green Tourism'. Removal of this site would also ensure that any future retail/employment is based closer to the town centre to support it and therefore meet strategy SE06. I therefore request that the above mentioned sites be removed as potential development sites from the emerging Local Plan and return to Green Wedge status.

Ian Devonshire Smith

Full name: Ian Devonshire Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EAST DEVON LOCAL PLAN SD 16: Allocation of new housing to East Budleigh li to Policies Map East Budleigh's quota of 22 houses should not be in Frogmore Road because of location, planning history and preferable alternative(s). Reasons

1. A 2014 outline application for 18 houses on a site fmcluding area Ebud 01 proposed for the 22 homes) was withdrawn, after objections, and replaced by a 2016 outline application for 5 houses on part of the site south-east of Ebud 01. Despite 47 public objections, detailed planning approval was obtained in 2021 on the basis of reduced scale and lack of impact on existing residents. A further application was made in 2022 for a single house, which has been built between the existing houses and the proposed 5,e of which has been built

2. Objections that continued to apply to the 5 (now 6) houses were, and remain- a. the danger of significantly increased traffic into a narrow =al road much used by pedestrians accessing the public footpath to the river and cyclists (mute 52), b. the proximity to Flood risk areas 2 and 3 c. the eastwards spread of the Village boundary into an AONB (National Landscape area) towards the Otter Valley (now also home to a nature reserve).

3. The effect of putting 28 houses on the area, where an application for 18 was withdrawn, greatly increases the above objections. In addition, the gardens and back of existing houses would be overlooked by houses on the slope up to Syon House. Crucially, the allocation of 22 houses to East Budleigh is tied to facilities in the Village (school, shop, pub etc). It is better that the residents of the 22 houses should have access to these facilities without having to cross the main mad. It also avoids all the extra traffic having to negotiate the difficult crossing by the Rolle Arms.

4. An alternative site, I believe called Collins Park as shown on the accompanying plan, can easily accommodate the area of Ebud 01, leaving free the footpath across the site for access into the Village (which could be connected to the path across the road by a pedestrian crossing). Also access to the flat section of the main road can be direct, avoiding existing congestion at the Rolle Arms crossroads (and access onto the main road below the brow of the hill, if Ebud01 were to be connected there). Unlike Ebud 01, the site is level and construction access is better. Extending the 30mph limit north beyond Salem Chapel would give extra safety. Other ways (Rolle Aims?) of distributing the 22 houses mandated by the District may be identified and it seems right for the Village to decide where they are to be placed. The settlement boundary should be amended to reflect the choice.

5. Obviously the views of the landowner and tenant of Collins Park (who either way lose a field but EB_01 seems to have been more used, for young cattle) are key but we trust the interests of the Frogmore residents and the residents around Collins Park and elsewhere in the Village will also be given appropriate weight. Nimby allegations may be raised but they are a two-edged sword and the residents at the west end of Frogmore Road already face a 50% increase in adjacent housing.

6. Finally, further housing density within around 500 metres of the Otter Valley and its new nature reserve is problematic in itself. New developments within 10 kilometres are reported to have adverse effects on sensitive nature locations.

Full name: Ian Devonshire Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: I do not wish to allege illegality without evidence but this is a question for lawyers, not lay residents. There should be a don't know button.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site, E_Bud01 is wrong because it was recently successfully opposed in planning, is outside the current settlement boundary, on farmland, near Flood Risk 2/3 areas, would cause dangerous traffic congestion and there is/are better alternative(s)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see attached note and accompanying plan showing an alternative site and changed settlement boundary

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Again there should be a don't know button but only learning of a site near our homes so apparently close to a decision does not seem to indicate cooperation

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: My neighbours in 19 houses in Frogmore Road support this application. That is all but 6 houses in the road - one derelict and empty, one new and empty, one where the neighbours are on a lengthy cruise (but would also support, I am fairly sure), one where the neighbour has submitted her own objection and two owned by Clinton Devon, whose views will have been heard. There is elaboration that the inspector may wish to examine.

Martyn Smith

Full name: Martyn Smith

Other party name (if relevant): Feniton Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Feniton Parish Council's comments on the Regulation 19 Publication Draft of the East Devon Local Plan. The Parish Council has commented at all stages of the Local Plan and taken every opportunity to attend and speak at the meetings of the Strategic Planning Committee. It is dismayed that the Planning Authority has never formally acknowledged the Parish Council's legitimate concerns or responded directly to any of the issues and objections that it has raised. It is the Parish Council's view that the process of preparing the Local Plan has been flawed and that elements of the plan, particularly as they relate to Feniton, are unsound. Pre-determination On the one occasion when the Parish Council was invited to meet face to face with the Leader of the Council, the Chief Executive and the Assistant Director responsible for planning, the planning officer stated that as Feniton was not in the AONB and had a railway station it was effectively ripe for development. This set the tone for the way in which Feniton has been viewed throughout this Local Plan process and in the view of the Parish Council demonstrated a pre-determined position from the out-set. This in spite of the fact that in 2014 the District and Parish Councils were united in their opposition to unfettered development at a "Super-Inquiry" that considered the appeals of 4 refused planning consents for large scale housing in the village. The Inspector at that Inquiry agreed with the District and Parish Councils and concluded that Feniton was not a sustainable location for large scale housing. The Call for Sites and "Common Place" Early in the plan preparation there was a call for sites where landowners and developers were encouraged to identify development sites. A total of 13 sites were identified at Feniton, vastly more than at any other tier 4 "service village". While initially only one was recommended for inclusion, the majority were categorised as "Second Choice" sites that could be developed dependent on the quantum of development deemed appropriate for a service village like Feniton. The District Council determined that it was to use the "Common Place" system for public consultation on the plan. It became clear

very early on that the system was not suited to a consultation at this scale. There were broken hyper-links and other glitches that led to huge frustration and dissatisfaction with the general public and District Councillors alike. Many were simply put off commenting at all. Because of this system failure and with additional encouragement by the District Council Chief Executive, Feniton Parish Council organised a clearly worded petition setting out reasoned objections to all the sites in Feniton except the site formally recommended for inclusion. This was signed by more than 500 residents but was never reported to the Strategic Planning Committee when it considered site allocations. Neither was there detailed reporting of the careful responses that a large number of residents persisted in putting on the Common Place system or sending by e-mail. The residents of Feniton do not believe that their views have been acknowledged, let alone given due consideration in the planning and site selection process. Mis-application of policy and arbitrary changes The Vision of the Local Plan states that “rural East Devon will retain its outstanding charm and character with modest and sensitively planned development to meet local needs”. The Spatial Strategy of the plan is logically based on a hierarchy of settlements. In order to achieve the greatest sustainability, more development is to be concentrated in the Principal, Main and Local Centres where there are existing infrastructures and employment. The Parish Council supports this approach. In the Regulation 18 version of the Local Plan, the Strategy stated that for the smaller settlements in rural East Devon, the tier 4 “Service Villages”, there would be “modest development to meet local needs” - in line with the Vision. When a member of the Strategic Planning Committee pointed out that the committee was allocating in Feniton housing numbers greater than necessary to meet local need the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version so that it now reads: “...E. allowing limited development at the Service Villages...” This was clearly a device to avoid the charge that the unsustainable proposals at Feniton are not in line with the plan’s intended strategic policy of only meeting local housing need in rural villages. However, the Vision in the Regulation 19 Draft remains “modest....development to meet local needs”. There is now a mis-match between Vision and Strategy because of the deception. As a result Feniton is burdened with housing proposals for 102 dwellings far exceeding the definition of modest development to meet local need. A Feniton housing need survey was funded by the District Council and undertaken by Devon Community Together in 2022. The identified local need then was for 13 dwellings in the following 5 years. The site Feni_08 Beechwood was recommended for housing late in the site allocation process as it became clear to the Strategic Planning Committee that it was not going to achieve the housing numbers required by national targets. Inadequate and inappropriate consideration was given by the committee to the sustainability consequences of agreeing this site. The site was already rejected by the Planning Inspector at the 2014 “Super-Inquiry” when it was the District Council arguing (at great public expense) that this was not a suitable site to achieve sustainable development. Nothing in the village has changed to make

development here in the 2020s any more sustainable than it was in 2014 - in fact it can be realistically argued that the circumstances have worsened. The frequency and reliability of public transport to the village has declined, the volume of journeys by private vehicle has increased, there has been no significant increase in employment in the village, the village school is over capacity and the nearest GP practice in Ottery is drastically over-subscribed. There is no credible evidence in the plan that sustainable development will be achieved from this allocation. Furthermore, there is imperfect understanding of both the foul and surface water drainage systems in the village. A flood alleviation scheme is currently being constructed in Feniton with the intention of capturing run-off from Cheriton Hill to the east of the village, diverting it around the village on its eastern side, taking it under the railway line and discharging it via an open watercourse to Ottery Road. This scheme is untested in practice. It is not known whether the scheme will completely solve the flooding in Feniton. Indeed it is quite possible that downstream flooding will occur on Ottery Road, the main access from the A30 to the village. This could have dramatic impact on vehicular access to the village at times of high rainfall and diversion of traffic onto entirely unsuitable country lanes. In particular, it is not clear whether the flood alleviation scheme will stop the surcharging of the foul sewer system in the village that currently occurs at times of high rainfall. At the moment this frequently results in the village foul pumping station on Ottery Road being overwhelmed. The outcome is foul sewage backing up into people's homes, discharge onto the public highway and discharge into the watercourse designed to carry storm water from the village parallel to Ottery Road. Allocating further development in Feniton that will increase surface run off and further burden the foul system, while these issues remain unresolved, is unsound planning. Late introduction of an employment site After the original Call for Sites and the Regulation 18 draft consultation, a late site was brought forward by the landowner and introduced into the local plan. Now known as Otry_20, it is a site of 4.64 hectares comprising an active orchard and a former poultry house. The site is adjacent to but outside the current built area boundary of the village. By a quirk of ancient parish boundaries it is in Ottery parish rather than Feniton. It is far distant from and has no bearing on the functioning of Ottery St Mary as a settlement but is very significant for Feniton village. The site was not consulted on in the routine Regulation 18 round and very few residents had the opportunity to comment. What comments there were, were not discussed at the Strategic Planning Committee. This site is very controversial. It is proposed in the plan as an employment site for general industrial, distribution and office/R&D uses. At 4.6 hectares it is totally disproportionate to the scale of Feniton. It represents more industrial/distribution land to be allocated in Tier 4 Feniton than in Tier 1 Exmouth (the Principal Centre) and in Tier 2 Axminster and in Tier 3 Ottery and Seaton. This is completely out of scale and not in line with the plan's stated spatial strategy of concentrating development proportionately across the settlement hierarchy. The Regulation 19 Local Plan Draft proposes redrawing the Feniton settlement boundary to newly include site Otry_20 to

which the Parish Council has objected. The Parish Council contends that this change in boundary is a contrivance to ensure that employment Policy SE01 applies to the site. In reality the site is outside the village (in fact in another Parish altogether). As such it would normally be considered as “Employment development in the countryside” to which employment Policy SE02 of the Local Plan would apply. In these circumstances the site allocation and its intended uses would fail the policy tests set out in Policy SE02. The business is not close to full occupancy nor is there a proven need from new or expanding functions. Expansion is not proportionate to the size and scale of operations nor prioritising re-use of existing buildings. Development will not be readily accessible via a range of modes of transport, nor would it be socially and environmentally acceptable. Development of this countryside site for industrial, distribution and research purposes would not be compatible with overall plan strategy and other local plan considerations. Were it to be argued that the proposal is a form of farm diversification, the Parish Council would contend that it fails the policy tests in Employment Policy SE03. The allocation does not represent an ancillary or subordinate component of an existing enterprise. Development would prejudice the existing agricultural undertaking on the site. New building, parking and other structures on a 4.6 hectare site would not be modest in scale. Quite apart from the policy failure, the site itself is totally unsuitable. It is accessed off a narrow country lane with an unconventional junction to the village “main” road. The site entry point is between two humped, narrow railway bridges and where there is no footway. It is wholly unsuitable for large commercial vehicles and largely incapable of improvement at a realistic cost. The site is beyond the natural village boundary formed by Green Lane and in open countryside. A recent planning application further east on Green Lane was refused by the District Council for the same reasons. Gagging of the Parish Council When the site proposal Otry_20 came before the Strategic Planning Committee the Parish Council came to the meeting prepared to make its case against the proposed inclusion of the employment site. However, at the meeting the Chair of the Committee ruled that no representative of the Parish Council could address the Committee because the site was technically in Ottery St Mary Parish. This was totally undemocratic and an abuse of process. As stated above, the site has no bearing on Ottery St Mary but is very important to the functioning of Feniton and the Parish Council was prevented from raising residents’ legitimate concerns with the Committee. Flawed Sustainability Appraisal The Sustainability Appraisal includes a lengthy section on the sites that emerged from the Call for Sites. A member of the Parish Council’s Local Plan Working Group made detailed comments on the original appraisal of the Feniton sites which have never been acknowledged or reported to the Strategic Planning Committee. No changes have been made to the Sustainability Appraisal and no explanation given as to why the suggested amendments were rejected. The Parish Council remains concerned that this element of the Sustainability Appraisal is flawed and understates the sustainability impacts of development proposals in Feniton. Conclusion Because of the failings detailed above,

Feniton Parish Council questions whether the plan has been developed in a legally compliant way. It is further doubtful of the soundness of the plan as far as the proposals for Feniton village are concerned. The lack of evidence to support the allocation of 102 houses and 4.6 hectares of employment land in a small Tier 4 Service Village with poor infrastructure and a known flooding problem is very concerning. In the Council's view there has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy. The Parish Council proposes the removal of employment site Otry_20. It would support the inclusion of a more modest employment land allocation proportionate to its Tier 4 status and more appropriately located relative to existing infrastructure. The Parish Council proposes the removal of housing site Feni_08 until such time as the Flood Alleviation Scheme is completed and its efficacy tested and until the foul sewage system has been improved to eliminate excess storm water surcharge. In terms of achieving sustainable development in the village, the Parish Council doubts whether an allocation of more than half the land comprising Feni_08 would be appropriate within the plan period given the lack of evidence of need and the existing infrastructure constraints. The Parish Council supports in principle the inclusion of housing site Feni_05 but remains concerned that it too will be developed before the storm and foul water systems have been improved to cope with the current and new demands.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because throughout the Local Plan preparation the Parish Council has taken every opportunity to set out to the Strategic Planning Committee and the Council its well founded concerns about emerging proposals for Feniton village. These have been neither acknowledged nor acted upon. The Parish Council believes its only redress now is to provide its evidence to the Planning Inspector unless the Regulation 19 plan is amended before submission to prevent unsustainable and premature development in the village.

Benjamin James Smith

Full name: Benjamin James Smith

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.:
I believe that the CCMA implications for individual home owners contravenes their rights under European Law.

2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I understand why large infrastructure projects for the benefit of the wider community may be better developed elsewhere. Stopping individual homeowners developing their properties need to be removed though.

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: I believe that it is not sound for the following reasons:

1. The CCMA restricts what individual householders can do with their own properties. The ECHR asserts that individuals are entitled to 'peaceful enjoyment of their possessions' and this contravenes that right under European Law.

2. There is significant doubt and disagreement over the evidence on which the rate of erosion is based. There are multiple sets of data all generating differing predicted erosion rates. There is the Beach Management Plan data (BMP 216), the Shoreline Management Plan data (SMP 2010) and the University of Plymouth Study data (UofP 2022). All data sets differ and contradict one-another. The data on which the CCMA is based is therefore unclear and in doubt. The Local Plan has used multiple and differing data for erosion across drafts of the LP but this has not been explained. It is a very bold move to assert the rates that are being asserted based on the scientific evidence.

3. EDDC is responsible for the beach at East Beach Sidmouth and for sea defences. EDDC has not implemented sea defences to protect East Beach Sidmouth. In 2016 EDDC completed the Beach Management Plan (BMP) – which took 4 years to complete. No action has resulted in the 9 years since 2016 and no protections have been provided.

4. Most importantly, there is an imminent Beach Management Scheme (BMS) for East Beach Sidmouth that aims to reduce the rate of erosion. Environment Agency money has been secured - approx £16.5M to complete the works. This is crucial as these works will significantly improve erosion rates and alter the CCMA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Essential modifications are as follows:

1. I believe that the CCMA implications for individual home owners contravenes their rights under European Law and that this restriction should be changed

2. The Local Plan must clearly say that once the Beach Management Scheme has been implemented the CCMA will be immediately reviewed

3. The current predicted erosion figures only apply 'without further management of the site' - University of Plymouth. Further management of the site is about to happen. The CCMA is then immediately in doubt.

Proposed new wording is as follows - an addition to 7.7 - thank you for considering:

7.7.1 Coastal erosion retreat rates should and will be monitored and future shoreline positions updated using the most recent retreat rates, particularly where new coastal defence works have occurred. Specifically, given the planned and imminent coastal defences for Sidmouth's East Beach, reassessment of future shoreline predictions at East Beach will be essential as soon as works are complete as will amendments to Coastal Change Management Areas (CCMAs) where indicated.

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Adapting to Climate Change chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Yes, assuming that these representations are considered and taken into account - thank you

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like the opportunity to verbally articulate my concerns and my arguments - thank you for your consideration

Full name: Martyn Smith

Other party name (if relevant): Feniton Parish Council

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: Flawed Sustainability Appraisal The Sustainability Appraisal includes a lengthy section on the sites that emerged from the Call for Sites. A member of the Parish Council's Local Plan Working Group made detailed comments on the original appraisal of the Feniton sites which have never been acknowledged or reported to the Strategic Planning Committee. No changes have been made to the Sustainability Appraisal and no explanation given as to why the suggested amendments were rejected. The Parish Council remains concerned that this element of the Sustainability Appraisal is flawed and understates the sustainability impacts of development proposals in Feniton.

Lisa Blood Smyth

Full name: Lisa Blood Smyth

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. the services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies" which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to the irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Michael and Tamara Snell

Full name: Michael and Tamara Snell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: With reference to the above Plan and particularly to Station Road Whimble which is referred to as Whim_11 (land at Station Road), we have the following observations:

1. We thoroughly endorse the comments submitted by Whimble Parish Council.

2. In the last few months the stream which runs along one boundary of the proposed site has flooded over ten times. It is already a flood risk and more property close by will add to it, particularly at the bottom of Slewton Crescent. Our boundary wall faces the stream and we have first hand knowledge of just how frequently it breaks its banks. Doubtless, climate change with increased rainfall will add to what is already a serious problem.

3. The entry and exit has already been discussed in our Parish Council paper. Additionally we wish to reiterate the danger to pedestrians, wheelchair users and parents with prams as there is no pavement nearby. This applies throughout the village and any increasing vehicular traffic will obviously increase road safety problems.

4. Why doesn't EDDC respond to clarifications, changes or any questions?

5. We feel that the planners appear to overlook historical events, investigations, and existing regulations to suit the needs of fulfilling overall housing requirements. For instance, tree preservation and land of local importance, etc.

We consider that this project should be abandoned.

Jane Speake

Full name: Jane Speake

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

In addition, the local infrastructure is already stretched beyond capacity, especially in terms of the roads and our woefully inadequate sewage system.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Jane Speake

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I'm writing to express my major concerns about the plans to build 700 houses along St John's Road (Exmo-20). Currently and historically this area provides a natural boundary along the edge of Exmouth, with unique environmental value.

The road system, our woefully inadequate sewage system and infrastructure in terms of educational and health services is not fit for purpose. I regularly use this area as a pedestrian, including walking up to the churchyard at St John's where my parents are buried. Already, I take my life into my hands crossing Dinan Way and traffic issues will become much worse with the new road. The cars from 700 new houses will add to this, not least because people will be entirely dependent on cars to get anywhere.

I'm not opposed to new development in principle. I hope the new road will deliver what it has been promised in spite of the fact that it will impact on me in terms of traffic noise levels. However, there is nothing in these proposed plans that convinces me that this is just another opportunity for developers to make lots of money, selling expensive houses to people moving into the area, delivering nothing that is needed by local people.

I write with hope rather than optimism. I don't believe that the views of local people will be taken into account, and will be dismissed as nimbyism. However, the least I can do is voice my concerns, to stand up for what will be lost forever in our beautiful town.

Julie Stacey

Full name: Julie Stacey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17.

Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale buildings on it.

If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise.

The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. This is enjoyed by many local people and visitors alike.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

timothy steel

Full name: timothy steel

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: It's doubtful if we can argue too effectively that East Devon District Council (EDDC) have not been legally compliant. Therefore we suggest writing something like this:

In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

You may want to comment on the below:

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.
- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Please write how YOU feel in this box. The more personal the comments, the better.

These are suggestions to make on the soundness of the plan:

Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.

- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.

- It's well documented that roads and homes often flood with raw sewage.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.

- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.

- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

If the whole draft local plan is rejected, the whole of East Devon, including Feniton could be imposed with far greater development than has been suggested. Therefore suggestions for this section are:

To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: These are a bit like giving evidence in a court where you can be challenged by the Inspector and cross examined by a legal team acting for EDDC or developers.

Feniton Parish Council will probably do this if EDDC do not respond to our points by changing the draft local plan.

This is your choice.

Stefan

Full name: Stefan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Exmo_20 would increase the need for car and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Alison Mary Stenning

Full name: Alison Mary Stenning

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This site is adjacent to the pre-school nursery and youth centre, long established by Colyton Parish Council as the only central site for a new Primary School as the current school is land-locked and cannot expand further. With 72 new houses being built in Colyton, where are the children going to be educated? DCC have agreed this site should be retained for a Primary School when they have the funding (I can provide the evidence after the consultation has closed).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Another site has been offered to EDDC in the Green Wedge above Courtney Drive in the Old Orchard. It could accommodate at least 60 houses .

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It's taking away Colyton's ability to prepare for future generations. There's nowhere else for a Primary School to be built. It was earmarked by

the Parish Council more than 20 years ago for a new Primary School. Now that the CeramTec site has gone with 72 new houses being built, where else can one be built?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I think this is vital for Colyton and its future generations.

Full name: Alison Mary Stenning

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

1. Area of Great Landscape Value protected by the NPPF
2. Great Crested Newts breed in the attenuation pond in the field across from Clay Lane. Building and development work would harm them and their habitats which are protected by law.
3. Foraging ground of Grey Long-eared bats on the Red List of Endangered Species. There are only around 1000 of these mammals in the whole of the UK with a maternity roost just over 1000 metres away in Colyford. Radiotracked and registered over the past few years, they then fly down Burnards Field Road.
4. Beer Quarry and Caves SAC and bat activities over this field include foraging and the provision of connectivity between designated roosts for both the Lesser Horseshoe Bat and the Greater Horseshoe Bat, as well as the Key Lesser Horseshoe Bat Sustenance Zone (the area which includes critical foraging and commuting habitat for the bats). The Key Lesser Horseshoe Bat roost at Coles Mill is around 1,075 metres away, whilst the roost at Alaska Farm, Colyford is around 1,200 metres from the site. Colyton Rest House in the cemetery at the end of Burnards Field Road is a suspected mating site of Greater Horseshoe bats.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy

or paragraph. Please be as precise as possible.: This is an unsuitable site to develop for obvious reasons and cannot be modified to make it legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- 1.No consideration of the inevitable Ecological damage.
2. 20 houses were built at Seaway Head as a Rural Exception Site for Social Housing for local people and it is a blot on the landscape above the 200 foot contour specified by the Government Inspector not to be built above to preserve the setting of the historic town of Colyton and its conservation area in the late 1980s and which 92% of residents voted for in agreeing with the Colyton Parish Neighbourhood Plan (the other 8% were from Colyford who have since formed their own Parish Council) . There is no street lighting in this development and neither could there be in the proposed development because of the bats.
3. It's an unsustainable development on the skyline and can be viewed from across the Axe Valley and the Coly Valley, both in the East Devon National Landscape (AONB).
4. Lack of employment opportunities in Colyton will result in commuters. It would destroy Love Lane and Fair View Lane (Colyford) as commuters seek access to the A3150.
5. It's isolated from the town centre at the top of a very steep and narrow hill so residents would use cars. Colyton already has a traffic problem due to the medieval layout of its roads.
6. Lack of basic infrastructure - Primary School placement shortages and tiny GP practice.
7. Accessible only from single track lanes which run with surface water. Clay Lane is little more than a footpath whose banks keep collapsing.
- 8.High risk of flooding due to clay soil and too far from River Coly to drain surface water.
9. Blind bend at junction of Old Sidmouth Road and Hillhead which cannot be improved upon.
9. The properties at Burnards Field Road to the northwest of the site are at a considerable lower level and are at risk from flooding. The gardens already flood regularly and there are privacy and security concerns.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This is an unacceptable site for development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Mainly environmental protection and infrastructure planning. Another site has been offered to EDDC in the Green Wedge above Courtney Drive in the Old Orchard which is closer to the town centre, the river, sewage works and the main road B3161 without building above the 200 foot contour or destroying wildlife habitats. It could accommodate at least 60 houses and would not be visible from afar. It would constitute a natural development of Courtney Drive and would not stick out like a sore thumb.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am determined the proposed development is unlawful.

Marilyn Stephen

Full name: Marilyn Stephen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people living there would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. The development is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High St, doctors, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. Importantly the development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the Local Plan and not in accordance with the mitigation strategy. It would fragment and isolate habitats and destroy Wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Radically reduce the size of Exmo_20 or revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jason and Emma Stephens

Full name: Jason and Emma Stephens

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I am writing to formally raise concerns regarding the proposed development of a Traveller site at Langaton Lane. While we fully acknowledge and support the Government's policy to provide appropriate accommodation for Gypsy and Traveller communities, as outlined in the Planning Policy for Traveller Sites (updated 12 December 2024) (Government Policy Link), we strongly believe that the Langaton Lane site is unsuitable for several reasons.

Our key concerns are:

1. Site Suitability – Environmental and Infrastructure Issues
2. Access and Safety Concerns
3. Educational and Social Disadvantages for Traveller Children
4. Fairness and Transparency of the Site Selection Process
5. Cost-Effectiveness and Public Spending Considerations
6. Conflicts with Local and Regional Transport Policies
7. Failure to Adhere to Government Policy Guidelines

1. Site Suitability – Environmental and Infrastructure Issues

- **Floodplain Risk:** Approximately one-third of the proposed site lies within a floodplain, raising serious concerns about the safety and sustainability of this development. The Planning Policy for Traveller Sites (Policy C, Paragraph 11) explicitly states that local planning authorities should ensure Traveller sites are located in areas that do not pose undue environmental risks, including flooding.
- **Noise Concerns:** The site is adjacent to the M5, and other developments in the area have been refused due to excessive noise pollution. The Government's policy highlights that sites must provide a healthy and safe living environment (Policy H, Paragraph 27), which is not the case at Langaton Lane. The Site Selection Report notes that another site (Brcl_02) was considered "probably unachievable" due to noise impact from the M5. However, the report makes no mention of similar concerns regarding the Langaton Lane site, which is equally exposed to the motorway's noise.
- **Ecological Impact on Pin Brook (Minerva) Country Park** The Site Selection Report dismisses ecological concerns as 'minor' without providing evidence. Given the site's location adjacent to Pin Brook (Minerva) Country Park, the failure to assess ecological consequences raises concerns about the validity and thoroughness of the environmental assessment

2. Access and Safety Concerns

- **Narrow Road and Emergency Access:** The report overlooks Langaton Lane's narrowness, particularly in the section between the Pinhoe Rifle Club and the site entrance. This part of the road presents severe challenges for larger vehicles, particularly caravans and trailers, which are expected to use the site. The lane's width is inadequate for such vehicles, leading to previous issues with vehicles unable to turn past the Rifle Club or navigate tight corners, especially in winter when road conditions can be worse. There were historical road width restrictions in this area, and there is no evidence that these constraints have been taken into account in the current proposal. The narrowness of the lane also means that emergency vehicles, including fire trucks, would face difficulty accessing the site in the event of an emergency. This presents a serious fire safety concern, as proper access for fire engines cannot be guaranteed. The Planning Policy for Traveller Sites (Policy B, Paragraph 13) emphasizes that Traveller sites must not compromise emergency vehicle access.
- **Flooding of Langaton Lane:** The access lane to the site, Langaton Lane, is frequently flooded, particularly during heavy rains. This presents significant accessibility challenges, especially for larger vehicles, which would need to access the site. There is also a notable dip and narrow section in the lane near the bridge, making it impassable for double-length wheel-based vehicles. These access issues would severely hamper the movement of residents and pose safety risks in emergencies.

- **Pedestrian Safety:** The lane is used frequently by walkers and cyclists as a designated Green Lane under the Devon County Council Exeter Transport Strategy (2020-2030). The report makes no mention of the current use of the lane, which is a popular route for walking and cycling, noting Langaton Lane's link to Pinhoe Station and designation as a Green Lane. Furthermore, the suitability of access for a travelling community is not considered, with no acknowledgement of the possible requirement for road widening to ensure safe access of vehicles and pedestrians. This is evidenced by the reference to Langaton Lane as a 'relatively narrow road' in the Langaton Lane Green Lane report (CET/22/80), a Report of the Director of Climate Change, Environment and Transport. The level of detail provided in the site selection report is limited, and raises concerns that the full impact, particularly as it relates to safety in relation to the current usage, has not been considered. Increased vehicle movement from the proposed development could pose safety risks and contradict Devon County Council's goal to promote sustainable transport.

3. Educational and Social Disadvantages for Traveller Children Local schools are already oversubscribed, with currently no spaces being made available to pupils within the area (Tithebarn) to any of the three closest schools – Pinhoe, Westclyst and Monkton. According to the East Devon District Council's Gypsy and Traveller Plan, Traveller children should have access to education without barriers. However, the only alternative would be for Traveller children to travel long distances for schooling, which contradicts government policy to ensure sustainable site locations (Policy A, Paragraph 7). All traveller children if treated the same as non-traveller children would be allocated schools 2.4 miles away, a 45minutes walk – this is the same school as many children in the Minerva development.

4. Fairness and Transparency of the Site Selection Process

- **Contradictory Assessments:** The Site Selection Report notes that another site (Brcl_02) was considered "probably unachievable" due to noise impact from the M5. However, the report makes no mention of similar concerns regarding the Langaton Lane site, which is equally exposed to the motorway's noise. This inconsistency suggests a predetermination to favour Langaton Lane over other potentially more suitable sites.

- **Disregard for Community Input:** The Strategic Planning Committee (Meeting, 5 September 2023) noted that Langaton Lane had "little support" from the community, yet it remains the preferred site. This raises questions about the fairness of the consultation process.

- **Lack of Transparency in Methodology** The official Site Selection Report includes placeholder text for the methodology ('INSERT WEB LINK TO UPDATED VERSION'), suggesting that the assessment was published without a completed methodological framework. This omission further questions the rigour and transparency of the process.

- **Alternative Sites:** Why was Langaton Lane not considered a viable option when the larger Tithebarn plan was first put together eight years ago, especially when there was already a known shortage of Traveller spaces in the region? Had the site been considered earlier, perhaps a more suitable and better-served location could have been identified. This raises the question as to why larger, more appropriate sites, such as those between the A30 and Topsham, have not been explored. It is also confusing as to why this has been raised now that the sites in the surrounding areas are near completion.
- **Financial Bias in Site Selection** Council documents regarding Baxters Farm in Musbury indicate that the County Council dismissed it for Traveller accommodation to maximise its value for residential development. This suggests a financial bias that undermines the principle of fair site allocation, as set out in the Council's own Gypsy and Traveller Plan.

5. Cost-Effectiveness and Public Spending Considerations The proposed £600,000 allocation for just five plots seems disproportionate, especially considering the significant infrastructure challenges at Langaton Lane. The lane's narrowness and the impracticality of accessing the site with large vehicles mean that, in the long term, this will likely prove to be an inefficient use of public funds. Furthermore, fire safety concerns also arise due to the single access point and the previously reported limitations regarding vehicle size in the lane. The access issues, combined with the flooding, could present significant safety risks for residents.

6. Conflicts with Local and Regional Transport Policies Langaton Lane is classified as a "Green Lane," as part of the Devon County and Highways Exeter Transport Strategy, which promotes walking and cycling as primary modes of transport. The proposed Traveller site could potentially disrupt this goal, given that the increased vehicle movement would undermine the emphasis on sustainable transport in the region. It is important that the site selection aligns with the wider transport objectives, which would not be the case with Langaton Lane.

7. Failure to Adhere to Government Policy Guidelines The proposal does not align with multiple aspects of the Planning Policy for Traveller Sites, including:

- **Policy C, Paragraph 11 (Flood Risk)** – The site is partially within a floodplain.

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- Policy B, Paragraph 13 (Emergency Access) – The road width does not allow emergency vehicle access.
- Policy H, Paragraph 27 (Site Suitability) – The noise levels from the M5 compromise residents' wellbeing.
- Policy A, Paragraph 7 (Proximity to Services) – Local schools and essential services are already oversubscribed. Conclusion The selection of Langaton Lane for a Traveller site appears to contradict established planning principles and lacks transparency. We urge the Council to reconsider this decision, conduct a more thorough review of alternative sites, and ensure that planning decisions align with Government policies and community needs.

Ben Stephenson

Full name: Ben Stephenson

Organisation (where relevant): Overgrown Removals

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ? An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan ? Reduce the size of Exmo_20 ? Do not access the site via the B3179 ? Do not access the site via Southern Wood ? Revert to Exmo_20b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Cindy Stevenson

Full name: Cindy Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: All Exmouth people, including those who can't travel, need to see fields, open spaces and wild animals locally (within walking distance.) Exmo_20 would increase the need for car travel, increase traffic congestion, in conflict with PARAGRAPH 11.2. Too much concrete, roads and houses, all cramping roads, which is currently bad. (Potholes not being managed.) The Town is already full, and too busy. Holiday makers, visitors, traffic jammers, accidents, crime, vandalism and antisocial behaviour, More housing will further escalate the problem, and more strain on locals. It is an unsustainable development. Too isolated, people would need to travel much further than 800m to existing key services and facilities contrary to PARAGRAPH 11.6. Too far from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. Exmo_20 closer to Budleigh Salterton than Exmouth, Budleigh is the most convenient and accessible town. Services and infrastructure of Budleigh (Shops, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. We fear the collapse of Exmouth's popularity, by changing the layout that people from the city's come to visit and appreciate. The value of the land is priceless as it is. Protect it, or it will be gone. We need to appreciate the land which has its beauty naturally, adds true value to the look and health of Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I have local knowledge.

Full name: Cindy Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Look at the land, take a breath of the air and listen to the lovely sounds of the birds. Birds of prey, bats, foxes, badgers, deer, woodpeckers, hedgehogs, bullfinches, house sparrows, already live on the land. Sharing it with sheep and horses. All that will be gone if this housing goes through. Killing a lot of Exmouth animal residents, which when you stop, watch and get to know, are priceless. The ratio of domestic cats and wildlife would be unbalanced, killing the wildlife. The Habitats Regulations assessment (30.01.25) “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. Conflicting POLICY AR01B.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Local voice.

Full name: Cindy Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed development Exmo_20 should be located on an alternative site where it would cause no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. People make a personal choice to live with fields near, believing the outskirts are protected, however Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. Let Exmouth have the option. Exmouth's birds and mammals need Fields, Trees and Hedges away from the public to thrive, safe from human harm. The ratio of wildlife space, and biodiversity versus houses, roads and people would be unbalanced. Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. Detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I have a local voice.

Gareth Stevenson

Full name: Gareth Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed development Exmo_20 should be located on an alternative site where it would cause no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. People make a personal choice to live with fields near, believing the outskirts are protected, however Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. Let Exmouth have the option. Exmouth's birds and mammals need Fields, Trees and Hedges away from the public to thrive, safe from human harm. The ratio of wildlife space, and biodiversity versus houses, roads and people would be unbalanced. Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. Detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I have local voice.

Full name: Gareth Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase car traffic congestion, conflicting with PARAGRAPH 11.2. It is an unsustainable development, isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far from the town centre for people to use walking or cycling as their choice of transport. Contrary to POLICY TR01.

The main access point to Exmo_20 is actually closer to Budleigh Salterton than Exmouth. So Budleigh it's most accessible town. The services and infrastructure of Budleigh (Shops, Doctor's, school, beach etc) would be the closest choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please remove Exmo_20 from Development Plans.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Local information.

Full name: Gareth Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

When the Habitats Regulations assessment was carried out on 30.01.25, this decided that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 being upstream of Exmouth is the main rainwater catchment area of Withycombe Brook, having a subsoil of heavy clay which makes soakaways ineffective. Exacerbating the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. Conflicting with POLICY AR01B.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Local opinions.

Full name: Gareth Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Exmo_20 proposed development should be at an alternative site, stopping any harm to the Pebblebed Heaths (SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 local plan and isn't in accordance with the mitigation strategy.

I believe Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, contrary to POLICY OL01.

Exmo_20 fragments and isolates habitats, destroying wildlife corridors, contrary to PARAGRAPH 13.23 Local Plan. Also being detrimental to habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20 should be removed from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I local person such as myself can personally explain why Exmo_20 needs removing from proposals.

Dr Richard Stewart

Full name: Dr Richard Stewart

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I think the proposed development at Exmo_20 should be located on an alternative site so it doesn't affect the pebble bed heaths (SAC/SPA). I believe that Exmo_20 is contrary to POLICY PB01 of the local plan and doesn't appear in line with the mitigation strategy. Exmo_20 would destroy the tranquility, wildness and dark skies of the countryside contrary to Policy OL01, in particular is adjacent to areas used by nightjars for feeding and display - a nocturnal and rare bird species well known to be adversely affected by additional lighting. Exmo_20 would affect wildlife corridors and be detrimental to irreplaceable habitats, trees and species rich hedgerows and be adjacent to the very special Bystock Pools nature reserve - a unique wildlife haven and habitat. I believe that Exmo_20 would adversely affect water drainage and increase flood risk on low lying land. It would also increase traffic congestion, and due to its location would adversely increase the pressure on local services in Budleigh Salterton contrary to Paragraph 11.6.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan. If not, reduce the size of Exmo_20 and do not access the site via to B3179 or via Southern Wood.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Paul Stock

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: · Remove Exmo_20 from the Local Plan, · Reduce the size of Exmo_20, · Do not access the site via the B3179, · Do not access the site via Southern Wood,

· Revert to Exmo_20b as previously proposed. THIS SEEMS THE MOST APPROPRIATE, AS IT WAS THE INITIAL RECOMMENDATION.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot

simply be mitigated by planting new trees. Exmo_20 also contains many long-established hedgerows across the site, the lengths of which are considerable.

The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council. Why has this position changed? Why was appropriate representation and consultation not put in place during the change of status?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. It appears to be misleading and of an underhand nature that the status was suddenly changed without opportunity for representation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. This does not fit in with the overall plan's objectives.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard.

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the massive problem it has.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of

0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and may well cause social exclusion.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements such as Woodbury or Budleigh Salterton.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages (e.g. Budleigh Salterton) and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Martin Stockley

Full name: Martin Stockley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: 1

The adequacy of local infrastructure has to be addressed as a consideration within any development proposals. The Primary School is near capacity and the medical centre is already struggling to cope with its existing patient load. Parking in the town centre is already very tight at busy times, as is traffic flow through the town. Will the Local Plan deal specifically with these issues, envisaging as it currently does a significant increase both population and traffic? Sewerage is another factor that will require careful assessment.

2 a) Regarding development on site Otry21, Policy OL10 says that development will not be permitted on Grades 1, 2 or 3a agricultural land except in exceptional circumstances. It seems doubtful that circumstances could be sufficiently exceptional to justify the proposed development at Gerway Farm as a priority over other options, particularly as a large number of grade 3 sites were offered around Ottery in the call for sites. By way of recent background, over the past seven years the Grade 2 field in question has been regularly fertilised and has grown at least one full crop of maize after ploughing; in the years when the farmer has chosen instead to sow or leave it to grass, it has produced several successive hay crops in each growing season. It is clearly a potentially highly productive piece of agricultural land. It has also been used, occasionally and on a temporary basis, to graze sheep. I note that one of the grounds for rejection of Appeal Ref: APP/U1105/W/24/3336475 (Land East of Sidmouth Road, Ottery St Mary EX11 1PW) by the Planning Inspector was because it contravened the then Local Plan policy in precisely this way.

b) There are already two traffic issues on the Sidmouth Road between the proposed site at Otry21 and Ottery town centre. One is where the road narrows just north of the entrance to Gerway Close where any large vehicles - tractors, buses, lorries etc - cause oncoming traffic to stop or reverse. The other is Tip Hill where: a) traffic has to wait/queue for oncoming vehicles to clear the parked cars at the side of the road and b) perhaps more importantly, the road past Luxtons is barely wide enough for two cars and has a pavement on the east side which narrows down to little more than 2½ feet width in places. Pedestrians are obliged to step into the road in order to pass one another. Vehicles pass so close to the footway as to create a hazard, and my wife is certainly not alone in having been hit by the wing mirror of a passing car. It is into this already constricted environment that the proposal to develop site Otry 21 would insert a further 100 or more additional vehicles and pedestrians. This is on top of the inevitable extra use arising from proposed new developments in other parts of Ottery, whose residents are bound to choose to drive this way to reach, for example, Sidmouth or the local recycling centre at Bowd. Anyone who uses this stretch of highway regularly knows that further development along the Sidmouth Road is simply not sensible.

Richard Stokes

Full name: Richard Stokes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Jane Stonham

Full name: Jane Stonham

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing concerning the plans for policy Sidmouth_31 and the access for this proposal. The access from Burscombe Lane and the alternative Windsor Mead are both narrow with very poor visibility and though the traffic speed is at 30 mph the narrowness of Sidford high street and speed and quantity of traffic let alone heavy goods vehicles means safety would be compromised and cause further congestion in this restricted area. Also sewage facilities in this area are an unknown quantity (SW water have no record of drains) which are old and barely cover this area let alone more housing. Access to the field is very restricted through private property or a single thoroughfare and the building encroaches on an area of national beauty. There are other sites more suitable and with better access and facilities Thank you for your consideration of these points. I would be interested in being at the hearings discussing this plan

Christine Stoodley

Full name: Christine Stoodley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Nigel Strawbridge

Full name: Nigel Strawbridge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmouth_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Robert Street

Full name: Robert Street

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. IT would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and opal would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to policy TR01.

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, school, beach etc) would b the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The development location should be moved to an alternate site, e.g. Exmo_20b as previously proposed. Any new development should include covenants for properties to only be available to those who have lived and worked in the area for a period of 3 years. This will ensure that Exmouth provides houses for those that need it and not those wishing to relocate, increase strain on infrastructure and services.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Dr. M. L. Street

Full name: Dr. M. L. Street

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Local Plan Sidmouth 31 – Land Off Burscombe Lane The application is for building in a zone designated as a protected zone known as “Natural Landscapes”, previously AONB. These areas should only be built on as a last resort when all other areas not part of “Natural Landscapes” have been considered. Some would argue that they should not be built on at all. Most landscapes are made by humans but nature does not have straight lines or have regular blocks. To make the site look more uniform by filling in to make a more regular block is a very poor argument and rather it would make the site look less natural. Also it will increase the likelihood of extending the building line in the future beyond the public footpath and in to the next field. The field in question has probably not been ploughed since the 2nd World War and could well be classed as an ancient meadow. Since it is private land and has been heavily grazed, it is difficult to examine but could well be rich in flora. The two hedge lines, one next to the public footpath and the other along Burscombe Lane both have the criteria needed to qualify for protected status. They are both very old but more importantly, they contain a very diverse flora. The hedgerow along Burscombe Lane contains the plant Dog`s Mercury which is recognised as a marker for identifying an ancient hedgerow. Access to the site would most likely damage this hedgerow.

2. The access and exit to the site from Burscombe Lane is only just one vehicle wide at one point, and is narrow along the whole length of the field to be built on. There is no public footpath and to be able to create these would damage the hedgerow and create an “urban” feeling in a rural site. Access to the A3052 from Burscombe Lane is already difficult and would be exacerbated by the increased travel.

3. Although not as steep as land further down Burscombe Lane, the hard landscaping on the site will add a large amount of water in to the brooks feeding the River Sid and increase the risk of flooding in the town. The grassland in the field will currently hold water which will mitigate against flooding.

4. The height of the proposed buildings is not in keeping with the mostly single storey bungalows in the adjacent areas and they are inappropriate for an area within the “Natural Landscapes”.

Jim Strong

Full name: Jim Strong

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo _20b as previously proposed.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am not convinced a balance of all voices will be heard without representation

Peter Strouts

Full name: Peter Strouts

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

2. Do you consider that this part of the High Quality Design chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the High Quality Design chapter is not legally compliant. Please be as precise as possible.: The houses on the front page are hideous. They will age extremely badly and stand out in a village that prides itself in aesthetically attractive old buildings. The windows are not like any window in the entire village, it stands out badly. Why would you advertise these house, that are actually next to an ancient stone finely crafted church?! Planners should focus on using local sustainable materials such as wood, lime mortar instead of cement is better for net zero.

2(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Planners should focus on using local sustainable materials such as wood, local stone. Lime mortar instead of cement is better for net zero.

3. Do you consider that this part of the High Quality Design chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Peter Strouts

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11.13

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not legally compliant. Please be as precise as possible.: You admit the developments will create substantial vehicle movements, this is not sustainable development in itself. Developments over a km from a train must admit that they are near to a rail station and this can not be factored into the sites assessment for planning.

2(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Why is there no investment in the infrastructure, such as improving the Exmouth to Exeter rail line. More services or even extending the track..

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Gerald Murton Strouts

Full name: Gerald Murton Strouts

Other party name (if relevant): For himself, and Mary Strouts

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL05

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.: The proposed plan includes the Property of Hillcroft, Burgmann's Hill in the green wedge. This Property is at the heart of the village, within metres of the village's shopping high street and the Lymestone train station. To propose putting this Property in the green wedge whilst accepting development on the periphery of the village goes against the key sustainability aims of the local planning policy (building with easy access to public transport and shops).

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The green wedge should stop along the Avenue, to the north of the Property.

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: The Property is at the heart of the village, within metres of the village's shopping high street and the Lymestone train station. To propose putting the Property in the green wedge whilst accepting development on the periphery of the village goes against the key aims of planning policy (building with easy access to public transport and shops).

Sustainability is a key theme to the new local plan. Including the Property in the green wedge which is located at the heart of the village, metres away from public transport, and all the village shops is completely contrary to sustainability and environmental values that the local plan is attempting to uphold. Furthermore, the planning officer's expert opinion was not heeded.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The green wedge should logically stop along the Avenue, to the north of the Property.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The reasons for the proposed green wedge and settlement boundaries have not been clearly explained, even after having exchanged with senior planning officers. I have understood that this proposal goes against the recommendations of the planning officer. I therefore would like to be present to ensure that the proposals are in line with planning policy, especially concerning sustainability considerations, and furthermore, our interests are protected.

Full name: Peter Strouts

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not legally compliant. Please be as precise as possible.: It sounds like a good idea to have 20% biodiversity net gain, however, in reality every development site East Devon has allocated houses for has seen the most appalling amount of destruction to the biodiversity. On Meeting Lane, Lymptone, they have destroyed a long ancient hedge, cut many trees down, so that they can claim from now onwards the gain is 20%. Also land being quantified as low grade agricultural by developers must be checked by biodiversity experts as it is clearly not true a lot of the time.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Net biodiversity must be independently verified, plus any destruction of the biodiversity in the previous 5 years must be taken into account.

Full name: Peter Strouts

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.15

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: East Devon have allocated a immense amount of housing in Lympstone and Exmouth. There is not a sustainable transport solution for these settlements. There is one train line which is accessible to the houses already developed near to the stations and a cycle path. The majority of the houses are not near these sustainable transport solutions and all proposed developments are not near, meaning a substantial increase in road use, and so higher risks of car accidents, CO2 and emissions, but also a larger delay for workers getting to work, reducing their productivity. All sites are green sites, meaning a reduction in farm land for sustainable living, plus a loss in biodiversity, trees, soil quality and worsening flash flooding.

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A dramatic reduction in the number of houses allocated to Lympstone and Exmouth.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: As mentioned above. Too many houses is unsustainable and makes net zero harder to achieve.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your

suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A dramatic reduction in the number of houses to be built.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: East Devon is allocating the lion share of houses in settlements like Lympstone and Exmouth because they have a local train, trying to justify the developments as sustainable. But the developments are at least a mile from the train, and never used by residents in these locations. For instance in Lympstone theses developments would lead to car use into the village, increasing pollution, accidents, and delays (meaning lower output of workers).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : I advise clients such as Legal and General and Network Rail on sustainable development of their land. I really do not think much sensible thought is going into these local plans.

Full name: Gerald Murton Strouts

Other party name (if relevant): For himself, and Mary Strouts

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP05

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: he proposed plan excludes the Property of Hillcroft, Burgmann's Hill from the settlement boundary. This Property is at the heart of the village, within metres of the village's shopping high street and the Lymptstone train station. To propose to exclude this Property from the settlement boundary whilst accepting development on the periphery of the village goes against the key sustainability aims of the local planning policy (building with easy access to public transport and shops).

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The Property should be reincluded within the settlement boundary and stop along the Avenue, to the north of the Property.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: The Property is at the heart of the village, within metres of the village's shopping high street and the Lymptstone train station. To propose excluding this Property from the settlement boundary whilst accepting development on the periphery of the village goes against the key aims of planning policy (building with easy access to public transport and shops). Sustainability is a key theme to the new local plan. Excluding the Property from the settlement

boundary which is located at the heart of the village, metres away from public transport, and all the village shops is completely contrary to sustainability and environmental values that the local plan is attempting to uphold. Furthermore, the planning officer's expert opinion was not heeded.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The Property should be reincluded in the settlement boundary, and stop along the Avenue, to the north of the Property.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : The reasons for the proposed green wedge and settlement boundaries have not been clearly explained, even after having exchanged with senior planning officers. I have understood that the proposed changes to the local plan go against the recommendations of the planning officer. I therefore would like to be present to ensure that the proposals are in line with planning policy, especially concerning sustainability considerations, and furthermore, our interests are protected.

Full name: Peter Strouts

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP05

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: Hillcroft, Burgmann's Hill has been allocated green wedge. It is in the centre of the village, bordering the rail station and the shop and pub. It is a sustainable location if development were to happen.

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: This should not be a green wedge, it is a garden with garages and sheds, however, the national trust fields nearby should be as correctly annotated.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: It should not be in the green wedge.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It should not be in the green wedge.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It means the planners are choosing to develop the village in unsustainable locations.

Full name: Peter Strouts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The two developments for 42 houses are nearly a mile from the centre of the village, meaning they are not served by the local rail service or the cycle path, nor convenient for the school, shops etc. This is against a net zero policy, as it would increase car use. They are located off very narrow country lanes, where visibility is very poor. There is no doubt that any access would be unsafe. I cycle my children every day to school along these roads, these developments would end my ability to do this. Pushing myself and more residents to have to use the car, a net zero target is laughable with this.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove these allocations for development. Certainly both 42 house developments must be axed.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Lymptone proposals are not sustainable developments and therefore not sound. They are in areas of poor access, Harefield cross onto the A376 is unsafe to use by car, Meeting Lane has a blind corner and already two large logistics buildings that block the road for one time when they are being accessed. The resident who lives in this field is young and yet drives to the primary school from here. There is not sufficient parking at the local primary school so they all park on Greenhill Avenue's pavements, making it

unsafe for children to actually walk to school. These developments will worsen the amount of car use in the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the proposed developments, especially the two 42 house sites on Meeting Lane and Strawberry Hill.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is making Lympstone unsafe for residents who rely on these roads to cycle to school and increasing car use. Why not put the houses in another village, where the effect is less pronounced?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As these development plans in Lympstone are not acceptable.

Full name: Peter Strouts

Proposal:

6. Mitigating Climate Change

1. To which part of the Mitigating Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: CC02

2. Do you consider that this part of the Mitigating Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not legally compliant. Please be as precise as possible. :

Development sites should be considered where it is likely the residents could not need to own a car. There is no mention of reducing the use of the car. Locating near to work hubs, shops etc

3. Do you consider that this part of the Mitigating Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.: There is no mention of any sustainable solutions to the area, such as river and rail freight and encouraging this with developing hubs and networks. No mention of sustainable materials. Or use of lime mortar rather than cement which dramatically reduces the carbon footprint of developments.

Ian John stuart

Full name: Ian John stuart

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It's too important to ignore

Hayley Sutton

Full name: Hayley Sutton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. ? The Habitats Regulations assesment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Martin Swallow

Full name: Martin Swallow

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accesible town. The services and infrastructure of Budleigh High St., Doctors, schools, beach etc would be the preferred choice for residents of Exmo_20 . This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth - contrary to POLICY OL05 of the local plan. Not supported by sufficient and necessary infrastructure. Current roads are in poor condition -extra users will worsen the situation. The current sewerage operation cannot adequately cope with current infrastructure. The principal applies to medical services, schools and shops. The development will detrimentally change the whole nature and character of the area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Amy Sweet

Full name: Amy Sweet

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heath (SAC/SPA).

Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy

- Exmo_20 would destroy the tranquillity, wildness and dark skies of the countryside, which is contrary to Policy OL01

- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to paragraph 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9

-The habitats regulations assessment (30.01.25) confirms that there is currently not sufficient certainty to rule out adverse effects in integrity in relations to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with policy OL09 and PB04

- Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to policy HE02

- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with policy AR01B

- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with paragraph 11.2. It is unsustainable development. It is isolated and people

would need to travel much further than 800m to existing key services and facilities, contrary to paragraph 11.6. It is too far and too steep from any town centre for people to use walking or cycling as their choice of transport, contrary to policy TR01

- The main access point for Exmo_20 is significantly closer to Budleigh than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh would be the obvious choice for residents of Exmo_20 and this would lead to coalescence of Budleigh and Exmouth, contrary to policy OL05 of the local plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Expo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Anthony Sykes

Full name: Anthony Sykes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN10

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Why mix old with cheap new infill unless new is in line with old character.

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: new is in line with old character.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: open to abuse

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Too expensive. So development should be dropped .

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Try another county. Devon is built on second homes that dont benifit locals financially or environmently.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Anthony Sykes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN11

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Why mix old with cheap new infill unless new is in line with old character.

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: new is in line with old character.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: open to abuse

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Too expensive. So development should be dropped .

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Try another county. Devon is built on second homes that dont benifit locals financially or environmently.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Keith Symes

Full name: Keith Symes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD22

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This development is part of a National Landscape (NL) and part of a Site of Special Scientific Interest (SSSI) and does not comply with the requirements for development within these areas.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I do not consider that this plan can be legally compliant in this area.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are a number of reasons I believe these plans for Newton Poppleford (NEWT04 & NEWT05) are not viable and are listed here.

1. In a National Landscape (NL) the conservation and enhancement of their natural beauty should be given priority over other considerations. Within these areas development should only be provided for where it would support the conservation or enhancement. National Landscape is afforded the same level of importance in terms of landscape importance as is enjoyed by National Parks. There is a duty of all relevant authorities to have the purpose of conserving these areas. These new plans are overbearing and would change the nature and outlook of the National Landscape.

2. This land is adjacent to a Site of Special Scientific Interest (SSSI) namely the Pebblebed Heath.
3. The wild life in this area requires protection. There are Deer, Bats, Badgers and I am informed Dormice. There are a large variety of bird species that include Owls and Buzzards plus many others. We are next to this plot of land and we have Newts, Frogs and Toads in our garden and they can be heard calling to others in the field (NEWT05).
4. Where is the justification for a need of this much expansion in Newton Poppleford. The proposals would increase the Village size by 5.6%, a major increase in a small Village. This proposal represents unsustainable development and is inappropriate in terms of social, economic and environmental roles that development should play in such settlements.
5. South West Water with their current infrastructure struggle to cope with the clientele they currently have, they are clearly not in a position to cope with more.
6. The small school is at capacity and not in a position to take what would almost certainly be a large increase in pupils.
7. In 2023 there was unprecedented rainfall that is becoming more common. The run-off from NEWT05 caused flooding in a number of houses in Badger Close. Building (i.e. impermeable material) on that area will only further increase the potential for surface water run-off onto Badger Close and the B3178 road.
8. On two previous occasions permission was sought to develop this land and even on appeal the permission was refused. These refusals were for very good reasons, those reasons still stand today.
9. There are minimal facilities in Newton Poppleford, No Doctor Surgery, No Pharmacy, No Access to a Dentist - NHS or Private. Just a small village shop, two takeaway restaurants and two car repair garages. Safe road crossing facilities are also inadequate as evidenced (but not acted upon) by the death of an elderly person attempting to cross the road.
10. The increased road traffic through the adjoining roads, Badger Close and potentially Beech Close, would be hazardous for current residents and generate further traffic entering the B.3178 with consequential risk of additional danger to and free flow of traffic.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The planning boundary has been shifted to encompass a site previously dismissed as inappropriate in a NL. This goes against co-operation with those who previously worked on and developed the previous plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This plan needs to take into account all of the points I have raised and obviously those raised by others in the community. Justice as they say "needs to be seen to be done".

Josephine Talbot

Full name: Josephine Talbot

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO_20 is much closer to Budleigh Salterton than Exmouth. The access from this development would be more convenient for the residents to go to Budleigh Salterton. It would lead to coalescence of BS and Exmouth, contrary to POLICY 0L05 of the Local Plan. This is not a good idea as both towns are very different in type of population and atmosphere. The road from the proposed settlement is fast, difficult and awkward to get on and off from the location of the proposed settlement. You can see this easily from other turnoffs on that road. 2. EXMO_20 is also contrary to Policy PB01 and would cause harm to pebble beds etc. It would also have a harmful effect on adjacent designated sites contrary to Policy 0L01. It is also in conflict with Policy 0L09 and PB04 as the Habitats Regulations Assessment (30/01/25) re; air quality etc. EM_20 would also be in conflict with Strategic Nature area 368. and contrary to Para 13.23 of local plan. Cause harm to irreplaceable habitats - contrary to Para 13.9. Floodrisks - and conflicts Policy AR01B. Car travel and increased traffic congestion. Isolated location would mean people would need to travel by car as the walk or bike ride is too dangerous and difficult. It is contrary to Policy TR01 and in conflict with Para 11.2. I live in BS and am very aware of the parking and congestion BS town has.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan. You have enough development around this area as it stands and Cranebrook is still only half built. So why do you need this?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be fully informed of discussions regarding this and to make sure they are fair and just.

Alexis Anne Taylor

Full name: Alexis Anne Taylor

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
Thoughtful expansion.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Perhaps provide a good sized shop on tyhe Broadway site

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Susan Thomas

Full name: Susan Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Who owns this land? If it is National Trust then it belongs to the people whose wishes and opinions should be addressed.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

Exmouth has been continually reported in 2024 as one of the most polluted towns on the coast. The red flag closing the beach area due to the dangers of sewage on the beach and in the sea was disgraceful. More housing leads to more sewage and other services.

Can the Council explain where and how the network of SW Water supply and disposal of water and waste can be maintained for the proposed building on such a massive scale in our town?

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Barrie Thomas

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Ref page 78 of the draft local plan-Vehicular access: I have concerns about what mechanisms will be put in place to prevent private cars from the upper site accessing roads where public transport buses will use to travel through southern wood and into meadow view road, therefore the whole site will be accessible by car through these two already congested roads, the on street parking in these roads with private vehicles is heavy, with cars parked on pavements through many areas, pedestrian access with prams and mobility scooters are forced into the road to pass. Buses through meadow view and southern wood will be difficult to progress with cars parked on both sides making it very narrow.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Attending hearing session(s) is vitally important, I believe, as I reside in one of the access roads on the southern boundary it is in my best interest to be present at such a hearing.

Karen Thomas

Full name: Karen Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, doctors, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to a coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. Exmo_20 would increase the need for car travel, contrary to fig 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan Reduce the size of Exmo_20 Do not access the site via B3179 Do not access the site via Southern Wood Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Health and well-being. In terms of health and well-being, the NPPF emphasises the importance of creating healthy and sustainable communities. The lack of school places , GP surgeries and additional cars on our heavily congested roads through the town (s) highlight the unattainable nature of the site for both people and climate, contravening the EDDC's own Climate Emergency Action Plan and pledge to achieve carbon neutral council by 2040. This application fails to address these important points

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe that it is an inappropriate access to the site from Southern Wood via Dinan Way via Meadow View Road, it is too convoluted, causing real time problems entering and exiting the proposed development Exmo-20 site.

Access to the site via the B3179 and Southern Wood should be denied as it will result in an additional 770 + cars travelling to surgeries, schools, shops and employment outside the town. It will also greatly contribute to increased: 1) gas emissions, 2) pollution, 3) noise, 4) risk of accidents and contribute to already high commuting traffic in the area. Waste services and emergency would struggle with access from the nominated sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. This application is unsustainable and inadequate in its design for flooding, waste-water and pollution prevention, South West West is already unable to control sewage flowing into the watercourse in this area.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Access to the site via the B3179 should be denied as it would contribute to already high traffic movement in the area and will result in an additional 770 + cars travelling to surgeries, schools, shops, and employment outside the town. It will also greatly contribute to increased: 1) gas emissions, 2) pollution, 3) noise, 4) risk of accidents and contribute to already high commuting traffic in the area. Waste services and emergency would struggle with access from the nominated sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, which I believe, our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The NPPF highlights the importance of sustainable transportation and connectivity to reduce the impact of urbanisation on traffic congestion, stresses the need to reduce traffic carbon emissions and minimise the impact of development on the environment. This application fails to address these important points.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, which I believe, our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe that it is an inappropriate access to the site from Southern Wood via Dinan Way via Meadowview Road, it is too convoluted, causing real time problems entering and exiting the proposed development Exmo-20 site.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development with the access road outside our front door intrinsically affects our health and wellbeing, I believe that our views should be heard.

Kelly

Full name: Kelly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo 20 could and should be located on an alternative site where it would cause less or no harm to the Pebble bed Heath (sac/spa). Developing Exmo 20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo 20 would destroy the tranquility wildness and dark skies of the countryside which is contrary to POLICY OL01

Developing Exmo 20 would fragment and isolate habitats and destroy wildlife corridors contrary to PARAGRAPH 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veteranary trees and species rich hedgerows across the site contrary to paragraph 13.9.

The habitats regulations assessment (30.01.25) confirms that there is currently not sufficient certainty to rule out adverse effects on st john in the wilderness grade 2 listed church and church yard drastically altering the peaceful setting for worship which currently exists. This is contrary to POLICY HE02 .

Exmo 20 is upstream of Exmouth on the main rainwater catchment area of Withycombe brook on a sub soil of heavy clay which makes soak ways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo 20 would increase the need for car travel and increase traffic congestion, in conflict with paragraph 11.2. It is unsuitable development it is isolated and people would need to travel much further than 800 m to existing key services and facilities, contrary to paragraph 11.6. It is too far and too steep from any town centre for people to use walking or cycling as a mode of transport. This is contrary to POLICY TR01.

The main access point to Exmo 20 is significantly closer to Budleigh salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and Infrastructure of Budleigh, high street, doctors, schools, dentists, beach etc would be the obvious choice for residents of Exmo 20 this would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Barrie Thomas

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: Objection On p.340 it states “Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:

- Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment, though for areas of Exmo_04 and 20 within 400 metres of the Pebblebed Heaths mitigation would not be seen as possible. Exmo_04 can be amended to exclude the most sensitive area, resulting in Exmo_04a.” Why is it only Exmo_04 that can be amended? It’s inconsistent and therefore not justified. The site allocation and the settlement boundary must be repositioned 400 metres from the Pebblebed Heaths. On page 342 Exmo_20 is listed as a preferred alternative for Exmouth, yet as it failed HELAA being deemed “not suitable or achievable”, in accordance with the 2.4 of this Sustainability Appraisal report, it cannot be a preferred alternative. The document is inconsistent, not justified and therefore on these grounds consequently not sound. On p.343 the reason for rejecting sites lists: Exmo_04b – Land at Marley Drive is rejected due to major adverse biodiversity effect arising from its location within 400 metre Pebblebed Heaths exclusion zone. This is again is inconsistent with the Exmo_20 allocation is not justified and accordingly not sound. The site allocation and the settlement boundary must be repositioned 400 metres from the Pebblebeds Heath.

Full name: Barrie Thomas

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.:

Objection In the Exmouth Sites climate change adaption commentary (p.336), there is no mention Exmo_20 having flood risk at the lowest end of the site. Nor is it mentioned that this large greenfield area entirely drains into Withycombe Brook, which has significant identified flood risk in Exmouth and has not been assessed in the Strategic Flood Risk Assessment of this draft Local Plan [EDDC Level 1 Strategic Flood Risk Assessment – Final Report February 2024 p.69 states “This table does not provide information on all Main Rivers in East Devon. Other Main Rivers within East Devon are: Grindle Brook, Wotton Brook, Withycombe Brook, Budleigh Brook, Back Brook, Snod Brook, The Gissage and Woodhayne Range.”]. Considering the existing conditions, that the Brook runs through the centre of the largest settlement in East Devon, and the substantial size of the proposed Exmo_20 allocation upstream, this is unjustified. In the Exmouth Sites access to services commentary (p.338), a figure of 1,600 metres is used, this should be 800m as the 1600m is total trip ‘there and back’ [All links reference on p.186 of the Local Plan are broken/out of date but the Government’s National Design Guide does states 800m. “Sustran, Walkable neighbourhoods” also states 800m as standard walkable distance and 1600m total trip]. Distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. As the main site access point is now out onto the B3179 country road, this should be a material consideration in this section. Using the 1,600 metre figure is unjustified. In the Exmouth Sites connectivity and transport commentary (p.340), It is claimed that Exmo_20 is within 800m of the A376, this is not true (over 2 miles), therefore unjustified. Also of note is that distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. As the main site access point is now out onto the B3179 country road, this should be a material consideration in this section. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Full name: Barrie Thomas

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: Objection In the Exmouth Sites Biodiversity objective on (p.331/332), two sites, Exmo_04 and Exmo_20 score double negative (--). The commentary and conclusions between the two sites are inconsistent and unjustified. Exmo_04 results in part allocation outside of the 400m yet Exmo_20's allocation runs right up to be adjacent to the protected site. In the Exmouth Sites Hist. built env. commentary (p.334), the large size of the site is assumed to enable the adverse impacts to have a minor negative effect. Firstly the site has significantly shrunk since the ownership was actually checked after allocation on 3rd September 2024, secondly the top 400m of the site cannot accommodate housing and thirdly it is the size required to accommodate 700 houses, therefore I do not believe an assumption that mitigation can be incorporated is sufficient justification. In the Exmouth Sites climate change carbon emissions commentary (p.335), a figure of 1,600 metres is used, this should be 800m as the 1600m is total trip 'there and back' [All links reference on p.186 of the Local Plan are broken/out of date but the Government's National Design Guide does states 800m. "Sustran, Walkable neighbourhoods" also states 800m as standard walkable distance and 1600m total trip]. Distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. As the main site access point is now out onto the B3179 country road, this should be a material consideration in this section. This site is not in a sustainable location and its allocation is therefore not consistent with national policy. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Full name: Barrie Thomas

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: Objection Figure 2.2 (p.11) states “1. Biodiversity: to conserve and enhance the habitat and wildlife of our natural environment. Natural habitats and biodiversity; flora and fauna Ensure current, and potential future, habitat connectivity is not compromised”. Allocation of Exmo_20, a supporting habitat for foraging Nightjars would be contrary to this, furthermore Exmo_20 is located on the SNA 368 which is being allocated as a site with the Devon Local Nature Recovery Network (LNRS) as required by the Environment Act 2021, so allocation would be in conflict with this strategy of conserving and enhancing the habitat and wildlife of our natural environment. This is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20. On page 11/12 it states “4. Climate change and carbon emissions. Development that minimises the need to travel by providing access to public transport, cycle.” Allocation of Exmo_20 would not minimise the need to travel, as it is in an unsustainable location with the main site access point now out onto the B3179 country road. Allocation of this site is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20. On page 18, figure 2.4: Site criteria to be considered as a ‘reasonable alternative’ confirms that Exmo_20 cannot be a reasonable alternative as it failed the HELAA stage being deemed “not suitable or achievable” (HELAA Appendix E(v)1). Its allocation is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Full name: Barrie Thomas

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.:

Objection 2 The Sustainability Appraisal Framework should make reference to the Mitigation Hierarchy which prioritises avoidance over mitigation. This is the structured approach to managing environmental impacts embedded in several key pieces of legislation. Some of the most relevant include:

1. The Environmental Impact Assessment (EIA) Regulations (2017)
2. The Environment Act 2021
3. The National Planning Policy Framework (NPPF)
4. The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations)
5. Defra's Biodiversity Metric and Biodiversity Net Gain Guidance To implement this in the site selection methodology or process is not consistent with national policy and therefore not sound. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Full name: Barrie Thomas

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: Objection 1 Exmo_20 is on the reasonable alternatives list (p.328), with the justification that all the sites were assessed as suitable, available and achievable in the HELAA, Exmo_20 was not. With this evidence it is clear that Exmo_20 plan does not have the capability of being achievable, its inclusion is unjustified and must be omitted. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Lisa Thomas-Jenkins

Full name: Lisa Thomas-Jenkins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative location should be used so that the pebble bed heath (SAC/SPA) should not be harmed. Developing Exmo_20 contradicts Policy PB01 of the local plan and is not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Robert Thomlinson

Full name: Robert Thomlinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Sarah Thomlinson

Full name: Sarah Thomlinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Sophie Thompson

Full name: Sophie Thompson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: LYM 07 is another inappropriate designation, lying in the flood catchment Wotton Brook and contravening policy OL03 stating no development should occur in coastal preservation areas.

It will also contravene policy OL05 causing coalescence with Exmouth

Policy 13.23 describes the importance of connected wildlife corridors and not fragmenting habitats. This area designation would effectively compromise this policy. It lies in an area of veteran trees and special hedgerow.

The development would also create additional traffic. Car ownership and usage in Devon is prolific and behaviours ingrained. People will drive to and from this development and not use more active travel methods.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I suggest that GH/ED/72A and 73 and LYM 07 be removed from the Local plan area designations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sophie Thompson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

GH/ED/72A and 73 lie in a coastal protection zone which is a sensitive landscape from a character and visual impact perspective and adjacent to pebble bed heaths. Policy OL03 states no development in Coastal Protection areas so this feels at odd with that. It is also adjacent to the Exe estuary RAMSAR.

The sites also include veteran trees and species that are important for nature conservation in the hedges, contravening other EDDC policy.

Impact these designations and fragment habitats and wildlife corridors. Contravening paragraph 13.23. These connect protected estuary wildlife with pebblebed heaths. We are in a catastrophic situation in the UK with habitat loss and biodiversity decline and these type of blanket changes have severe impacts that are widespread.

In addition, these roads experience regular flooding and can be impassable after a storm event, further development would exacerbate this.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I suggest that GH/ED/72A and 73 and LYM 07 be removed from the Local plan area designations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Louise Thompson

Full name: Louise Thompson

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: Yes

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The CCMA shouldn't be imposed because as I understand it the evidence base for the rate of erosion is not accurately determined within an acceptable margin of error due to the conflicting conclusions of several studies. This being the case until there is scientific consensus it does not seem fair to restrict what property owners can do with their own properties and money to improve and maintain their homes. I also believe that the long promised Beach Management Plan for which funding was secured years ago will make a significant difference and the public time and money going into this consultation would be FAR better spend IMPLEMENTING the actual PLAN to preserve the coastline. It took EDDC 4 years to complete the plan (which is astounding in itself) and NO ACTION has been taken since it was completed in 2016. 9 years ago! If EDDC are that concerned with this cliff eroding (which they should be) surely the focus should be on doing the actual WORK to protect it? This is less about individual property owners decisions and far more about why the £16.5M of funding secured from DEFRA in 2023 has not been spent to protect the east cliff.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Anne Thompson

Full name: Anne Thompson

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: The emerging Local Plan is proposing around 284 houses in and around Seaton, despite, I believe, a housing needs assessment not being undertaken and despite Seaton's unique natural environment which needs protecting. There are currently over 75 properties on the market in Seaton from £49,000-£450,000 plus those currently under construction at Fosseyway Court and Seaton Quay, with many other sites in the pipeline. It is also well known that so-called affordable housing frequently gets bought up by incomers, so increasing the already strained doctors, dentists and much reduced hospital facilities.

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I would like to see specific numbers related to what is actually required as affordable or required housing in the Seaton area, rather than what land can be grabbed and used to build on just to satisfy supposed government quotas. A development of over 70 new homes at nearby Colyton is currently being built with another large site planned. Our infrastructure is insufficient for any more new developments, in Seaton or outside.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: I believe that the key to protecting Seaton from unsustainable inappropriate development which will threaten

so much of Seaton's way of life and future, is for EDDC to remove the site for 130 at Harepath Road - which for over 25 years has been allocated for mixed use employment/recreation - from the emerging Plan altogether and return it to Green Wedge so that the town can build on all the work that has been put in during that time into developing Seaton as a destination for green tourism. Also, building these houses will bring the boundary of Seaton within a stone's throw of Colyford Village, which is an Ancient Borough of 800yrs standing, and will seriously impact on the life of the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Removal of this site would also ensure that any future retail/employment is based close to the town centre to support the town centre and therefore meet Strategy SE06 which says: Tier two towns (Seaton) form focal points of activity in East Devon towns and will be the preferred location for the development of new retail, leisure and other uses that attract and are used by people for commercial or community activities....."Development proposals that would result in the loss of existing local shops and services will be resisted where it would result in the significant or absolute loss of that facility to the community." Town centre shops have almost unanimously expressed their concern at the prospect of out of town shopping facilities at Harepath Road and many believe their businesses won't survive if such development were to go ahead. This is borne out by the statement that Tesco would bring shoppers to the town centre which never happened.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

The proposals in the Plan are significant in respect of our Green Wedges and, if the Plan is approved, it is likely to lead to uncontrolled building which will no longer provide protection, enhancement and conservation of our unique natural environment and will threaten the town's future economy which is based on Natural Seaton. It will lead to flooding of surrounding homes and of the Wetlands; to loss of biodiversity and rare wildlife; loss of prime agricultural land; would result in coalescence of the settlements of Seaton and Colyford; and would change the character of this area from open rural to virtually continuous urbanised. As the Planning Inspector stated when this site last came forward for development, "the housing shortfall although significant is - arguably - relatively short term, whereas the erosion of separation between Colyford and Seaton would be permanent".

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

John Thorne BA DipTP MRTPI(Rtd)

Full name: John Thorne BA DipTP MRTPI(Rtd)

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Policies Map

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Yes

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: An arbitrary, illogical and unjustified change has been effected in the southern settlement boundary of Lympstone in the interim between the Reg.18 and the Reg.19 versions of the proposals map. This has the effect of removing a site to the south of Underhill close from the settlement and affecting the Policy relevance of SP05 and SP06 despite the site having planning permission for redevelopment granted on appeal twice. The site is designated Lymp_16 on the Reg.18 map.

It lies to the west of Housing allocation site Lymp_01 between that site and the railway embankment. In the previous Reg.18 Local Plan Consultation map it was shown as Lymp_16 and shaded in blue (referred to in the key as 'Planning Permission Granted') and within the settlement boundary of Lympstone. Over 50% of the land is hard surfaced tarmac which was laid out as a car park during local works by a statutory undertaker.

On the regulation 19. Consultation inset to the Policies map, without any prior consultation, justification or explanation, a new and illogical rectangular inset has been drawn around the site, excluding it from the settlement boundary. On this plan it has been colour coded green as part of the 'Green Wedge' between Lympstone and Exmouth but is otherwise unmarked. The previous colour coding acknowledging it as land with 'planning permission granted' does not appear.

The circumstances of the site are that it benefits from planning permission for redevelopment (Granted on appeal on two occasions) and has been acknowledged by successive Planning Inspectors as capable of development with a negligible impact on the Green Wedge and Landscape Quality, to be in a sustainable location, and to read as infill which would relate very well to surrounding housing.

In the decision on the first appeal (1st March 2022) APP/U1105/W/21/3282445 The Inspector wrote: "The development would read as infill and would relate very well to surrounding housing, falling inside a notional building line across this southern extent of the village." " .. the scheme performs well against the sustainability objectives set out within the Framework." "...the site would be suitable for the proposal, having regard to the development plan's approach to the location of housing."

In the second decision (27th November 2024) APP/U1105/W/24/3341698 " The scale and position of the dwelling within the site follows the established building line on the edge of the settlement."

As it meets the relevant criteria the site has also been submitted for inclusion on the Council's register of brownfield land.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Restore the settlement boundary to include site Lymp_16 so that future development will lie within the logical and previously consulted boundary which has been acknowledged in two recent appeal decisions.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The Local authority must be held to account and provide a justification and explanation for the decision making process with regard to the settlement boundary change.

Full name: John Thorne BA DipTP MRTPI(Rtd)

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Table 1

2. Do you consider that this part of the vision chapter is legally compliant?: Yes

3. Do you consider that this part of the vision chapter is sound?: No

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Lacks positive commitment to achieving BNG

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: 'Support' an increase in Biodiversity should read 'Achieve' an increase...

4. Do you consider that this part of the vision chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

Full name: John Thorne BA DipTP MRTPI(Rtd)

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: Yes

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: This part of the plan is entirely silent on the subject of registering and directing residential development towards brownfield land. Pursuant to Regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017, the LPA is under a statutory obligation to identify and publish annually a register of brownfield land and to update it at least once a year. The register on the EDDC website states it was ‘recently’ updated in December 2021. It is therefore more than three years out of date.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: An additional Policy acknowledging and committing to meeting the LPAs statutory responsibility to register and promote the development of brownfield land in preference to open agricultural land or other open land. This should support the objectives of preserving the natural environment, enhancing nature conservation and biodiversity, and achieving early delivery and implementation of housing schemes to meet identified need. Available brownfield sites should be factored into the proposed housing delivery figures.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Thorne BA DipTP MRTPI(Rtd)

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: The housing figures fall below those of the NPPF which increased the housing requirement for East Devon 28% from 893 to 1,146 equating to an increase of 5,060 over 20 years (an additional 253 per year).

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revise the housing figures to reflect those in the NPPF (22,520 over 20 years) 1146 per annum.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:

1. There is a shortfall in the housing numbers

2. The 'Stepped trajectory' is unsound and will fail to deliver housing to meet identified need within a satisfactory timescale, rather it is a postponement and abrogation of the LPA's responsibility - potentially and cynically pushing meaningful change through housing delivery beyond the current Government's term of office.

3. The strategy is silent on the subject of delivery of housing on brownfield sites notwithstanding the statutory obligation to keep and update a register of them and to promote their development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Revise the housing figures to reflect those in the NPPF (22,520 over 20 years) 1146 per annum.
2. Remove the 'stepped trajectory' and do not effectively export the problem to another decade.
3. Make a policy commitment pursuant to Regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017 to annual registration and updating of the brownfield land register. Promote and include the potential delivery of housing on brownfield land as a sustainable alternative to consumption of open land and the natural environment. The register on the EDDC website currently states it was 'recently' updated in December 2021. It is therefore more than three years out of date

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Thorne BA DipTP MRTPI(Rtd)

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: "...provision will be made for at least 20,909 dwellings (net) to be delivered in the plan area between 1 April 2020 to 31 March 2042.." represents a shortfall of more than 2000 dwellings over the plan period against the NPPF figure under the Updated NPPF in which the housing requirement for East Devon increased by 28% from 893 to 1,146 equating to an increase of 5,060 over 20 years (an additional 253 per year).

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: provision should be amended to 1,146 per annum over 20 years (22,520)

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:

1. The proposed housing numbers are insufficient.

2. The delivery schedule will not meet need and is potentially pushing delivery further and further away - almost in hope of political chance beyond the term of the current Government. The chapter in paragraph 3.12 states: "In recognition of the complexities inherent in delivering major development sites, particularly the proposed new community provision of new homes will come forward under a stepped trajectory that will provide an annual average of 850 dwellings per year from 2020/21 to 2031/32 and 1,070 per year from 2032/33 to plan end at 2023/24..." Notwithstanding the fact that we are now four years into the plan period, the draft plan proposes site allocations which, for the first ten years of the plan period, fall short annually by 296 dwellings. The

‘stepped trajectory’ involves effectively ‘kicking the can down the road’ for another seven years until 2032 before the shortage can be addressed. The approach of the Reg.19 consultation version of the EDDC plan is ineffectual and insufficiently sound to contribute to meeting need and addressing the housing crisis, which is current, rather than seven years or more in the future. This is unconvincing and unrealistic, and lacks a robust evidence base demonstrating that the allocated sites and the numbers suggested can indeed be delivered in time to address need.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Correct the annual housing figures to meet the NPPF requirement.
2. Abandon the 'stepped trajectory' and emphasise support for1. delivering housing annually to meet need.
3. Introduce an additional policy making a commitment to meeting the legal obligation to identify and promote the delivery of housing on brownfield land within the district.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Thorne BA DipTP MRTPI(Rtd)

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: General Points The draft plan has progressed to consultation under Reg.19 against the backdrop of a change of Government with the incoming administration making a clear declaration of intent to reform the Planning System and prioritise delivery of housing; and the introduction of a statutory requirement to achieve an uplift of 10% in Biodiversity in relation to development proposals.

Housing Delivery Since Consultation under Reg.18, under the Updated NPPF, the housing requirement for East Devon increased by 28% from 893 to 1,146 equating to an increase of 5,060 over 20 years (an additional 253 per year). Faced with a significant level of increase over the same period, nearby Bath and North-East Somerset Council has announced a new call for sites as part of a ‘resetting’ of the local plan. In the EDDC Regulation 19. Draft, Strategic Policy SP02 states that: “Housing provision will be made for at least 20,909 dwellings (net) to be delivered in the plan area between 1 April 2020 to 31 March 2042. The housing requirement will be delivered through a stepped trajectory, with an annual target of 850 homes from 2020/21 to 2031/32, increasing to 1070 homes per year from 2032/33 to 2041/42.” First, this represents a shortfall of more than 2000 dwellings over the plan period against the NPPF figure. Secondly, the subsequent paragraph 3.12 states: “In recognition of the complexities inherent in delivering major development sites, particularly the proposed new community provision of new homes will come forward under a stepped trajectory that will provide an annual average of 850 dwellings per year from 2020/21 to 2031/32 and 1,070 per year from 2032/33 to plan end at 2023/24...” Notwithstanding the fact that we are now four years into the plan period, the draft plan proposes site allocations which, for the first ten years of the plan period, fall short annually by 296 dwellings. The ‘stepped trajectory’ involves effectively ‘kicking the can down the road’ for another seven years until 2032 before the shortage can begin to be addressed. The approach of the Reg.19 consultation version of the EDDC plan is ineffectual and insufficiently robust to contribute to meeting need and addressing the housing crisis, which is current, rather

than seven years or more in the future. This is unconvincing and unrealistic, and furthermore lacks a robust evidence base demonstrating that the allocated sites and the numbers suggested can indeed be delivered in time to address need. The new Government's forward-looking approach and methodology has been informed by many years of failure by the Planning system and previous Governments to address the growing housing crisis by achieving and facilitating sufficient housing to meet existing and proposed demand. Habitual allocation of sites where delivery is problematic because of ownership and infrastructure and citing them as evidence of a five-year housing land supply is an out of date and nebulous approach geared more towards developing a strategy for defending appeals against refusals of planning permission for residential development elsewhere, than to the actual delivery of housing. This approach needs to change. In particular a more pragmatic and supportive approach is needed to maximising and realising the potential for smaller sites to contribute to the delivery of housing, including a more rigorous examination of the potential for sustainable delivery on Brownfield land. The now statutory requirement for the achievement of BNG in relation to new residential developments has potential implications for the housing numbers and densities of residential development within planned allocated sites. BNG must be achieved within these sites or by way of purchasable BNG credits elsewhere. Unless each allocation is preceded by an audit in this respect and supported by evidence that the required uplift can be achieved and delivered, the Plan will not enable the LPA to demonstrate adequate provision of land where housing can genuinely be delivered in sufficient numbers. Pursuant to Regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017, the LPA is under a statutory obligation to identify and publish annually a register of brownfield land and to update it at least once a year. The register on the EDDC website states it was 'recently' updated in December 2021. It is therefore more than three years out of date.

Full name: John Thorne BA DipTP MRTPI(Rtd)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site within the respondent's ownership is shown on the Exmouth Inset Map forming part of the Reg. 19 Consultation. It lies to the west and north of Housing allocation site Lymp_07 between that site and the north-south section of Cortlands Lane. On the extract below it is immediately to the west of the letter 'L' of Lymp_07

In the previous Reg.18 version the Lymp_07 site and nearby Exmo_23 sites formed a larger Lymp_07 which was identified as a 'Second Choice' Housing Site.

The site is previously developed land, and the land edged red on the map above benefits from a Certificate of lawful Existing Use (March 2021) for the servicing and sale of motor vehicles. The land edged red comprises some 0.8ha of wider 1.75ha land parcel. The site was the subject of an unsuccessful appeal against refusal of PiP (APP/U1105/W/21/3285255) in April 2022. In making that decision the Inspector concluded, in the following terms, that potentially development would not have an adverse on the Green Wedge designation: " If, for argument's sake, dwellings were to be delivered in the approximate location and of the approximate scale of the existing garage structures, the scheme would likely have no additional impact upon the purposes of the Green Wedge designation." The determinative factors were the Inspector's judgement as to whether the site was problematic in respect of accessibility and whether it would give rise to 'Isolated' development in the countryside. He commented: "In this case, the site is a not inconsiderable walk to the range of services within Lympstone. The connecting roads undulate, turn sharply and are largely bereft of dedicated pedestrian space and street lighting. The route to the nearest bus stops and the small shop at the adjacent petrol station is shorter but similar. On this basis, whilst walking or cycling may be an option for some in some instances, I do not consider that the locational tests set out within Policy 2 of the LNP and Policy TC2 of the EDLP would be met." and: " Whether a proposal is or is not isolated is a matter of planning judgment. The site is clearly well away from Lympstone in an area explicitly identified to provide

visual separation between the two distinct settlements of Lympstone and Exmouth. The properties around the site read as a sporadic smattering of houses within the Green Wedge. As such, they do not appear to form a village or even a smaller settlement. For these reasons, in my judgment the site is also isolated in the Framework's terms." The draft plan includes planned material changes in circumstances which justify reconsideration of these issues. The adjacent 10 Hectares of land to the north of Courtlands Lane between the site and Exmouth Road was identified in the HELAA and the consultation drafts of the EDDC Local Plan 2020-2042 as 'Second Choice' Residential Site Lymp_07 with a capacity of 150 units in the regulation 18. Version. It has since become 'Housing and Employment' site Lymp_07 expected to provide 100 residential units, employment floorspace and sports pitches in the regulation 19. Version, demonstrating that the LPA is committed to ending its 'Isolation'. The Highway authority also suggest the same land is safeguarded in connection with the extension of Dinan Way. The Consultation drafts also designate land on the south side of Courtlands Lane, falling within first Lymp_07 (Reg 18) and subsequently as stand alone residential site Exmo_23 (Reg 19) suitable for 12 dwellings. That site is currently the subject of an application for planning permission. The connectivity of the site will therefore be significantly improved and its isolation ended by the planned connections set out in draft Policy SD01 in relation to the designation of sites Lymp_07 and Exmo_23 including the use of the area immediately to the south as sports pitches and recreation grounds as stated in Policy SD01 - "There should also be safe off-street pedestrian and cycle access that provides for east-west movement through the area for existing and future users linking into adjacent areas such as Lympstone Manor and allocated site Exmo_23." The 2022 Inspector's findings with regard to isolation and unsafe access can no longer carry the same weight. The Nursery Garage site subject to the Certificate of Lawful Existing Use can, as acknowledged by the Inspector, be developed with low density housing without adversely affecting the Green Wedge. Furthermore the owner has the benefit of an additional parcel of open land to the east on which improvements to Biodiversity can be effected in order to achieve on-site BNG, and frontage land on Courtlands Lane between the entrance driveway and the southern boundary, falling outside the CLEUD red line. These areas together provide further potential by way of CIL or S.106 contributions for the landowner to assist in achieving the improved connectivity sought to enable development of site Lymp_07. This could, for example include part of a pedestrian route from Lymp_07 to Courtlands Lane and a footway and vehicle passing place on the western boundary.

Given these circumstances the site has been submitted for inclusion on the Council's register of Brownfield Land. It should therefore be regarded as a developable site, capable of providing five or more dwellings in the context of the development plan.

Conclusion

- The respondents object to the general approach to housing allocation in the Regulation 19. Consultation which does not meaningfully address the requirements of emerging Government Policy and approach to the delivery of housing.
- The Respondents object to the failure of the Regulation 19. version of the plan to give full and proper consideration to the deliverability of the projected housing land allocations therein in the context of the statutory requirement to provide BNG uplift in the context of development proposals.
- The respondents consider the LPAs approach should support and identify housing delivery on smaller brownfield sites including Nursery Garage which are demonstrably deliverable, sustainable, accessible and ready for development, as part of their Housing Land Identification.

Full name: John Thorne BA DipTP MRTPI(Rtd)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land South of Underhill Close The site within the respondents' ownership is shown on the Lymptone Inset Map forming part of the Reg. 19 Consultation. It lies to the west of Housing allocation site Lympt_01 between that site and the railway embankment. In the previous Reg.18 Local Plan Consultation map it was shown as Lympt_16 and shaded in blue (referred to in the key as 'Planning Permission Granted') and within the settlement boundary of Lymptone. (See below). Over 50% of the land is hard surfaced tarmac which was laid out as a car park during local works by a statutory undertaker.

In a site selection report to the Council's Strategic Planning Committee of September 3rd 2024 it was stated that the respondents' site LYMP_16 (0.3ha) was not identified as a potential housing site in the Housing and Economic Land Availability Assessment (HELAA) on the grounds that it fell below the size threshold. However the introduction to the HELAA states that the criteria for inclusion is a minimum size of 0.15ha with capacity for 5 dwellings. The respondents' site should therefore be properly considered as a housing site with potential for delivery of 5 dwellings. The adjacent Lympt_01 site was described in the same report as follows: "Fairly level garden and field adjacent to Lymptone. Site adjacent to Coastal Preservation Area and features multiple small parcels of land with some garden areas. Mature trees across site, mature hedgerows throughout. Nevertheless, small scale site with existing dwellings around provide a built context, and overall, low landscape sensitivity to new development." The aerial photograph from that report is reproduced below. The respondents' site containing the car park is in the bottom left hand corner.

The previous owners of the respondents' site made representations to the Regulation 18. consultation in January 1993 (Copy attached) supporting the designation and

settlement boundary and making the case for the suitability of Lymp_16 for housing development in the same manner and density as Lymp_1. This latter point was not given adequate consideration or weight. On the regulation 19. Consultation inset to the Policies map, without any prior consultation, justification or explanation, a new and illogical rectangular inset has been drawn around the respondents' site, excluding it from the settlement boundary. On this plan it has been colour coded green as part of the 'Green Wedge' between Lymptstone and Exmouth but is otherwise unmarked. The previous colour coding acknowledging it as land with 'planning permission granted' does not appear. The circumstances of the site are that it benefits from planning permission for redevelopment (Granted on appeal on two occasions) and has been acknowledged by successive Planning Inspectors as capable of development with a negligible impact on the Green Wedge and Landscape Quality, to be in a sustainable location, and to read as infill which would relate very well to surrounding housing. In the decision on the first appeal (1st March 2022) APP/U1105/W/21/3282445 The Inspector wrote: "The development would read as infill and would relate very well to surrounding housing, falling inside a notional building line across this southern extent of the village." " .. the scheme performs well against the sustainability objectives set out within the Framework." "...the site would be suitable for the proposal, having regard to the development plan's approach to the location of housing."

As it meets the relevant criteria the site has been submitted for inclusion on the Council's register of brownfield land.

In the Interim the LPA has also, in advance of any formal acceptance of the Lymp_1 allocation, already granted planning permission for two detached dwellings on the westernmost part of that site. In a report of October 2024 in making that decision the Council considered a report containing the following statement: (Officer's report to the planning committee of 23rd October 2024 recommending that permission for two detached dwellings be granted on part of the LYMP_01 site.) "Overall, whilst there is some conflict with the adopted local plan, it is considered that due to the sustainable location of the site, the need for new housing, and the resolution to promote the site as a preferred allocation in the emerging local plan, the principle of development of this site is acceptable. The proposed dwellings are considered to be acceptable in terms of layout, scale and appearance and would not result in any significant harm to the character and appearance of the area or the Green Wedge designation to justify refusal of the application. The proposal is accompanied by detailed landscaping proposals which include maintaining the southern hedgerow at an appropriate height along with additional planting which would help to soften the impact of the development in localised and wider views." The report contained no comment from the Council's

Landscape Officer and went on to suggest that the previous grant of planning permission at appeal on the respondents' site (Lymp_16) demonstrates that development can be accommodated within the green wedge and outside the settlement boundary without harm. It should be further noted that the means of access to the two house development in question uses Underhill Close, rather than that from Underhill Crescent envisaged in the Lymp_1 allocation.

The respondents object to the unsound approach to housing allocation in the Regulation 19. Consultation which does not meaningfully address the requirements of the NPPF and emerging Government Policy, or take an appropriate approach to the sustainable delivery of housing.

- The Respondents object to the failure of the Regulation 19. version of the plan to give full and proper consideration to the deliverability of the projected housing land allocations therein in the context of the statutory requirement to provide BNG uplift in the context of development proposals.
- The respondents object to the over-reliance on agricultural and other open land to provide future housing sites whilst demonstrably failing to identify and promote the development of more sustainable brownfield land. In particular there has been a failure by the LPA meet its statutory duty to maintain and publish annually a register of Brownfield land. (This has not been done since 2021).
- The respondents consider the LPAs approach should show greater to support housing delivery on smaller brownfield sites, including Lymp_16 which, are demonstrably deliverable, sustainable, accessible and ready for development, as part of their Housing Land Identification.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The respondents object in the strongest possible terms to the illogical, unjustified and arbitrary change to the settlement boundary line resulting in the exclusion of site Lymp_16 from the Lympstone boundary. This line should revert to the position on the regulation 18 map.

5th March

Sam Thorneywork

Full name: Sam Thorneywork

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It is too large and not needed for the local area. There is masses of development in Exmouth already as well as Exeter which is leading to congestion on the roads, overstretching schools and Gp's and putting more pressure on a sewage system that isn't fit for purpose. The river Exe resembles an open sewer twice a day. It goes against numerous policies such as policy OL05, PB01, HE02, OL01, Policy. AR01B and POLICY TR01. The government and councils are ruining East Devon with overdevelopment. It's a joke that these massive, ugly, mundane developments seem unstoppable yet for the small developer it's near impossible.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There are already enough houses in the local area. We shouldn't be influenced by national policy. Remove exmo 20 from the local plan

Matthew Thornton

Full name: Matthew Thornton

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

Notwithstanding that the location of the proposed site will devalue property, and increase fly tipping and crime in the local area, I would like to voice my concerns that the site would be contrary to the following guidelines of the Government's planning policy for traveller sites, and is therefore unsuitable:

4j.. lack of school places and too much pressure on doctors, dentists , healthcare services including pharmacies.

4k.. protection of Country Park, and the high quality housing and High Tech Science Park.

10d.. proximity to Flood Zone 3 which in all likelihood will get worse with Climate Change .

10e.. Protection of Wildlife in Country Park, Safety and security of Scouts.
Consideration of welfare and Security for the many residents who have invested hundreds of thousands of pounds in East Devon for a high quality life in a developing high tech area.

13a.. Questionable if a peaceful co-existence can be maintained.

13b.. Lack of health services as in 4j.

13c.. Lack schools as in 4j.

13d.. risk of environmental damage.

13e.. Noise levels with proximity of M5 and SW Rail.

13g.. Site is on Flood Zone 3.

13h.. Langaton Lane is a No Through Road and is a walking route to schools, station, doctors, shops for the hundreds of residents of Minerva Estate.

26.. Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan

As a young working family on the estate, we are deeply concerned of the social, environmental and economic impact it would have on the community, should it be approved.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Matthew Thornton

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: UK

Government policy on traveller sites states '26. Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan'

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: In line with above policy paper, a traveller site should be away from existing settlements.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Cassie Thornton

Full name: Cassie Thornton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO2. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. There is also poor public transport provision into Exeter and Exmouth, and a significant distance from the train stations. This is contrary to POLICY TR01. The main access point of Exmo 20 is significantly closer

to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, dentist, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

MR JOHN THOROGOOD

Full name: MR JOHN THOROGOOD

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

Martin Thurgood

Full name: Martin Thurgood

Proposal: 16. Community Facilities

1. To which part of the Community Facilities chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph or policy number that your representation relates to.: 16.1

3. Do you consider that this part of the Community Facilities chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Community Facilities chapter is not sound. Please be as precise as possible.: There is the need for a Policy that requires those proposing major developments to provide for and construct community facilities as a part of their proposed developments. Failure to address the point is a major omission from your proposals.

Full name: Martin Thurgood

Proposal: 16. Community Facilities

1. To which part of the Community Facilities chapter does your representation relate?: Policy

1(a). Please write down the paragraph or policy number that your representation relates to.: CF01

2. Do you consider that this part of the Community Facilities chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Community Facilities chapter is not legally compliant. Please be as precise as possible.: There is the need for a Policy that requires those proposing major developments to provide for and construct community facilities as a part of their proposed developments. Failure to address the point is a major omission from your proposals.

2(c). Please set out the modification(s) you consider necessary to make this part of the Community Facilities chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Community Facilities chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see 2(b) above.

3. Do you consider that this part of the Community Facilities chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Community Facilities chapter is not sound. Please be as precise as possible.: Please see 2(b) above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Community Facilities chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Community Facilities chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see 2(b) above.

4. Do you consider that this part of the Community Facilities chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Community Facilities chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I have no idea on the point and am therefore neutral: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Thurgood

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: The Policy, SP01, fails to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: SP01 should be redrafted to address such matters. In particular, it

should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

Full name: Martin Thurgood

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: The Policy, SP01, fails to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution. SP01 should be redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: SP01 should be redrafted to address matters

identified in my answer to 2(b) above. In particular, it should advance the proposed second new community, WS01, as the solution to housing needs and increase its size such that development on the edges of existing settlements are unnecessary.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Please see comments made at Q. 2.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see comments made at Q. 2.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I am neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Thurgood

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Only large-scale development provides for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Development at the West End should be given priority, should be of such a scale that most other 'edge of communities' housing development is unnecessary, should be of class-beating standard (such as demonstrated by the Cornish Nansledan development) and should be commenced without delay.

Full name: Martin Thurgood

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:
DEVELOPMENT AT THE WEST END Only large-scale development provides for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. Development at the West End should be given priority, should be of such a scale that most other 'edge of communities' housing development is unnecessary, should be of class-beating standard (such as demonstrated by the Cornish Nansledan development) and should be commenced without delay.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see response at Q 3(b) above.
(Should your form say 2(b)???)

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: See earlier comments.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See earlier comments.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I am neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

5.1

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: DEVELOPMENT IN THE TOWNS AND VILLAGES The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution. Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
See response to Q2(b)

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See response to Q2(b)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I have no idea and am therefore neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: DEVELOPMENT IN THE TOWNS AND VILLAGES The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution. Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
See response to Q2(b)

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See response to Q2(b)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I have no idea and am therefore neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Otry_21: The proposed development of 70 homes on such a small site is inappropriate, not least given its rural setting and its location far from town centre facilities. Otry_10:

The site is not suitable. There are flood risks (surface and river). Access roads are unable to take any further traffic movements and there is no satisfactory pedestrian route. Otry_01b: Part of this site is currently an active farm, a centre of employment. It is not clear how the site can accommodate the new employment allocation for Ottery St Mary and additional housing. Further, the proposed housing density of the development is excessive. Otry_09: Flash flood risks at the northern site boundary which are likely to increase due to the planning approved quarry development must be addressed as must the down-stream impact on the existing Thorn farm estate, not least due to the inevitable loss of undeveloped grassland should approval be granted for Otry_09.

Otry_15: The proposed site is too far distant from town centre facilities to be viable.

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposals are poorly developed. Notwithstanding the objections raised to ‘edge development’ at large, specific issues arise as follows: Much of the Town’s infrastructure and services are already at capacity and no mention is made in your proposals for expanding provision. The GP surgery is overloaded, as is off-street parking provision, the central road system (Broad Street to Gold Street) cannot cope with current traffic volumes, there is not the capacity to provide for dedicated cycle lanes and pedestrian footways (where provided) are substandard. There is little or no opportunity for further employment growth: people will need to travel to Exeter contrary to policies intended to address the climate emergency. The distances and deep-valley topography means that most will drive from the proposed housing sites to town-centre facilities, contrary to policy objectives addressing the climate emergency. Recent housing developments have increased provision by some 25%: to add a further 318 dwellings is excessive.

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: DEVELOPMENT IN THE TOWNS AND VILLAGES The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution. Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

SD04 OTTERY ST MARY The proposals are poorly developed. Notwithstanding the objections raised to ‘edge development’ at large, specific issues arise as follows: Much of the Town’s infrastructure and services are already at capacity and no mention is made in your proposals for expanding provision. The GP surgery is overloaded, as is off-street parking provision, the central road system (Broad Street to Gold Street) cannot cope with current traffic volumes, there is not the capacity to provide for dedicated cycle lanes and pedestrian footways (where provided) are substandard. There is little or no opportunity for further employment growth: people will need to travel to Exeter contrary to policies intended to address the climate emergency. The distances and deep-valley topography means that most will drive from the proposed housing sites to town-centre facilities, contrary to policy objectives addressing the climate emergency. Recent housing developments have increased provision by some 25%: to add a further 318 dwellings is excessive. Otry_21: The proposed development of 70 homes on such a small site is inappropriate, not least given its rural setting and its location far from town centre facilities. Otry_10: The site is not suitable. There are flood risks (surface and river). Access roads are unable to take any further traffic movements and there is no satisfactory pedestrian route. Otry_01b: Part of this site is currently an active farm, a centre of employment. It is not clear how the site can accommodate the new employment allocation for Ottery St Mary and additional housing. Further, the proposed housing density of the development is excessive. Otry_09: Flash flood risks at the northern site boundary which are likely to increase due to the planning approved quarry development must be addressed as must the down-stream impact on the existing Thorn farm estate, not least due to the inevitable loss of undeveloped grassland should approval be granted for Otry_09. Otry_15: The proposed site is too far distant from town centre facilities to be viable.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: See response to Q2(b)

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See response to Q2(b)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I have no idea and am therefore neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: DEVELOPMENT IN THE TOWNS AND VILLAGES The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution. Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
See response to Q2(b)

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See response to Q2(b)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I have no idea and am therefore neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: DEVELOPMENT IN THE TOWNS AND VILLAGES The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution. Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
See response to Q2(b)

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See response to Q2(b)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I have no idea and am therefore neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Thurgood

Proposal:

6. Mitigating Climate Change

1. To which part of the Mitigating Climate Change chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

6.4

3. Do you consider that this part of the Mitigating Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.: Paragraph 6.4 -Box 1 highlights the essential need to site new development so as to minimise travel and provide access to sustainable transport solutions. But your proposals for 'edge of communities' developments and second-order towns run counter to this essential policy objective. Your proposals for development of the edges of existing developments requires a major review combined with a commitment to a new environmentally structured town on the edge of Exeter such that it takes up the new housing capacity currently assigned to existing towns. To do otherwise would be a major error that will be impossible to correct.

Full name: Martin Thurgood

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.:

SUSTAINABILITY APPRAISAL – NON-TECHNICAL SUMMARY PARAGRAPH 34. –

CURRENT TEXT IS AS FOLLOWS: Sites at the larger settlements generally have positive effects on transport connectivity, access to services, town centres, and carbon emissions, as there are greater opportunities for sustainable travel and minimising the need to travel to jobs and facilities. Such opportunities are less at the smaller settlements, but the scale of development is more limited, so positive effects remain. **COMMENT:** There appears nothing in the draft plan to support this assertion and its delivery. To advance Ottery St Mary as an example, there are currently no sustainable travel options that mitigate against the use of private cars: and there is nothing in the draft local plan to address the matter. Ottery St Mary has no fast link to the principal employment sites of Exeter, the airport and its related employment sites. There is no rail station and bus services are infrequent and very slow: but there is no draft policy or other proposal in the draft plan to address the point such as regular limited stop bus services to key employment locations and other major East Devon towns. (Similar issues no doubt arise at other larger settlements). On a smaller scale, there are no proposals in the draft local plan to eliminate shorter journeys by motor vehicles to and from the existing larger settlements. Again, to take Ottery St Mary as an example, there are no safe pedestrian and cycle links between the town centre and the smaller outlying settlements (Alfington, West Hill, Tipton St John, Wiggaton, etc) served by the Town's facilities (and, in the case of Ottery St Mary, a failure to address an essential safe link between the Town and the major employment and retail hub at the garden centre). The current narrow country lanes are considered by the overwhelming majority of people as unsafe for walking and cycling: but the draft local plan fails to address the matter. A policy of providing segregated pedestrian and cycle routes to address such matters is essential, not least on grounds of safety, 'Zero Emissions' and the promotion of thriving service centres in the smaller towns. (Such provision will also address the travel needs of an aging population as more mechanised disability vehicles come into use). To identify edge of development housing sites but fail to identify how sustainable travel will be secured is unacceptable and must be addressed if a case is to be made out for such developments.

PARAGRAPH 48. – CURRENT TEXT IS AS FOLLOWS: How can mitigation measures reduce the adverse effects of the Local Plan? 48. The SA report notes the mitigation measures that can be applied to the policies and sites to reduce any adverse effects; and where those measures have been incorporated into the Local Plan. Mitigation

measures will vary depending on the specific characteristics of each site, but some general mitigation measures include:

- Enhance sustainable travel links such as creating bus stops and pedestrian and cycle links within the site and off-site. COMMENT: Your proposed development maps do not show pedestrian and cycle links off-site: while such provision is clearly essential, a failure to indicate where such might be located simply fails to address the impossibility of its provision, as is clearly demonstrated by your proposals for Ottery St Mary and the Town's recent past experience. (No doubt the same can be said for other existing larger Towns). The matter must be positively and practically addressed in the Local Plan: it is not sufficient merely to raise the point but not address its resolution.

- Provide a mix of uses on-site, such as community facilities, employment land, open space and play space, and sustainable travel links – this is more realistic for large-scale sites. COMMENT: The statement is correct and highlights a major deficiency in the draft plan, that is, the provision of increased community facilities at the smaller towns where significant development is proposed. To advance Ottery St Mary as an example, the Town has experienced some 25% growth in dwellings in recent years (against a planned expansion of around 8%) but no additional community facilities have been provided. A further significant increase is proposed in the draft local plan but no increase in community facilities (other than schooling) has been identified and no land has been allocated for such use. (No doubt the same can be said for other larger towns). Simply to identify and provide for housing needs is unacceptable without also identifying how increased community facilities (for example, public transport, health and recreation, etc) can and will be provided.

PARAGRAPH 50. – CURRENT TEXT IS AS FOLLOWS: A range of alternatives have been considered for the topic-based policies and sites in the Local Plan. For the Spatial Strategy, alternatives on the distribution of development are to concentrate development at the existing settlements, with no further large-scale development at the West End; more development at villages; development at existing settlements but focus strategic development at the West End with either a new town or several smaller new villages. The preferred option is to promote development [A] at existing settlements where there is a range of jobs, services, and facilities; whilst also focussing development where there is good connectivity in close proximity to a much wider range of jobs, services, and facilities in the West End and Exeter. [B] The scale of development proposed in the new town offers the greatest potential for a mix of uses, reducing the need to travel and providing opportunities sustainable travel links, which provides

better accessibility and reduced carbon emissions. COMMENT: The text at [A] makes an assertion that is not supported by the fact. To give but one example, Ottery St Mary has limited jobs and most people commute to Exeter by unsustainable means, services (such as health and etc) are stretched to beyond capacity and facilities (such as parking spaces, recreational land and the like) are limited. Crucially, the draft plan proposal does not make out the case for the ‘preferred option’ that it selects, that is development at existing settlements with the remainder provided in the West End and Exeter. Indeed, by stating that focusing development where there is good connectivity in close proximity to a much wider range of jobs, services, and facilities in the West End and Exeter, the draft Local Plan overwhelmingly makes the case for the option of focusing development almost wholly in the West End and Exeter and not the existing settlements. The text at [B] simply supports and reinforces the point that development close to Exeter and in the West End is the overwhelmingly logical choice: and that development at existing larger settlements is second best and fails to address the crucial issues that now face us, not least the climate emergency, Zero carbon, and the like.

Mrs Nicola Tilley

Full name: Mrs Nicola Tilley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo-20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to Paragraph 13.9. The Habitats Regulation assessment (30.1.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with Policy OL09 and Policy PB04. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of the Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. it would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with Policy AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. It is an unsustainable development. It would be isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to paragraph 11.6. It is too far, and too steep, from any town centre for people to use walking or cycling as their choice of transport. This is contrary to Policy TR01. The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its' most convenient and accessible town. The services and infrastructure of Budleigh (High St, Doctors, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Exmouth and Budleigh, contrary to Policy OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Greatly reduce the size of development Exmo_20. Do not access the site via Southern Wood. The impact of large scale construction traffic, and later the traffic caused by the new residents, would be detrimental to the current residents of Southern Wood, Meadow View Road and surrounding area. The roads are already congested and cannot sustain any additional traffic.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Adrian Toole

Full name: Adrian Toole

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS01

2. Do you consider that this part of the Open Space and Sports and Recreation chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.: All OK

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:
All OK

4. Do you consider that this part of the Open Space and Sports and Recreation chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Open Space and Sports and Recreation chapter's compliance with the duty to co-operate, please use this box to set out your comments.: All OK

Full name: Adrian Toole

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

2. Do you consider that this part of the Open Space and Sports and Recreation chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.: All OK

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:
All OK

4. Do you consider that this part of the Open Space and Sports and Recreation chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Open Space and Sports and Recreation chapter's compliance with the duty to co-operate, please use this box to set out your comments.: All OK

Full name: Adrian Toole

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS03

2. Do you consider that this part of the Open Space and Sports and Recreation chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.: All OK

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:
All OK

4. Do you consider that this part of the Open Space and Sports and Recreation chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Open Space and Sports and Recreation chapter's compliance with the duty to co-operate, please use this box to set out your comments.: All OK

Full name: Adrian Toole

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS04

2. Do you consider that this part of the Open Space and Sports and Recreation chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.: All OK

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:
All OK

4. Do you consider that this part of the Open Space and Sports and Recreation chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Open Space and Sports and Recreation chapter's compliance with the duty to co-operate, please use this box to set out your comments.: All OK

Full name: Adrian Toole

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS05

2. Do you consider that this part of the Open Space and Sports and Recreation chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.: All OK

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:
All OK

4. Do you consider that this part of the Open Space and Sports and Recreation chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Open Space and Sports and Recreation chapter's compliance with the duty to co-operate, please use this box to set out your comments.: All OK

Full name: Adrian Toole

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: All OK

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: All OK

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.: All OK

Mrs Sue Trail

Full name: Mrs Sue Trail

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land at St John's Exmo – 20 Proposing – A Social and community facilities B Around 700 new homes; and C At least 2 Hectares of employment land. Not sound – as not justified – ‘Our chosen strategies and policies should be based on solid evidence and should be the most appropriate when compared to other options we could have chosen.’ This site was considered at the meeting of the Strategic Planning Committee on 3 September 2024 with an officer recommendation not to allocate the site for development with the main issues being infrastructure problems due to securing suitable access, impact on the landscape, impact on the historic environment; particularly centred on the area surrounding the Church of St John's in the Wilderness and ecology reasons due to the substantial areas of woodland within the site. Members chose not to accept Officer advice and decided to allocate this site in favour of other sites which were deemed to be suitable for development as recommended by officers in the same report. It was evident from the meeting that Members had not visited the site to assess its suitability for development even though this is one of the largest, if not the largest site allocation in the plan apart from the new town allocations. It appeared from the meeting that the reason for choosing this site was purely political and not substantiated by sound planning reasons to justify development. Access to the site would be a major problem due to the existing road network both within and surrounding the site. The only feasible means of access to the site would be from the B3179 to the northeast of the site, however, this could not be considered to be sustainable given the location and its relationship with the town centre of Exmouth. The site adjoins the East Devon National Landscape and the East Devon Pebble Bed Heaths SSSI to the northeast and a substantial part of the site falls within the 400m exclusion zone for development adjacent to the SSSI. The site is on rising land to the northeast of Exmouth and its development would have a significant detrimental impact on the landscape of the area.

The woodlands within the site, some of which are protected by Tree Preservation Orders provide habitat for considerable wildlife and the development of the site would result in having a significant detrimental impact on the ecology of the area. The Historical core of area surrounding the Church of St John in the Wilderness would be severely impacted resulting in substantial harm to the designated heritage assets of the area. The development is likely to cause problems of flooding due to increased surface water run-off into the nearby Withy Brook. The allocation of employment land within the site appears to be completely ad hoc in terms of its relationship to existing employment sites and appears to have been included as an afterthought to assist with meeting target allocations. Land for employment uses should be directed to the expansion of existing employment sites in Exmouth; for example, there is available land in the vicinity of the existing business park at Liverton. The Foreword to the Plan states that ‘East Devon is an Outstanding Place’, however, there is a total disregard to that statement in considering this site for development, as it would result in destroying a beautiful part of the East Devon countryside. Proposing this site for development is not sound, as it is clearly not the most appropriate site for development when compared to other options which could have been chosen. The site is not appropriate for development at all and to include the allocation of this site as one of the largest sites for development in East Devon has to be seen a total disregard for the significant qualities of the area and how this area contributes to making East Devon an outstanding place.

Siobhan Trapnell

Full name: Siobhan Trapnell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Angela Trimblett

Full name: Angela Trimblett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I find it crucial to express my serious concerns pertaining to the East Devon District Council's (EDDC) proposed Emerging Local Scheme, notably policy SD29 and the intended assignment of the Whim_08a plot (Land located to the west of Bramley Gardens). It's my firm belief this assignment is unsound, demonstrating a lack of credible rationale. This unsound assignment threatens the well-being of our community and the integrity of the planning process. The EDDC Strategic Planning Body conducted a review of the Whimble Site Selection Document during a session on October 1, 2024. During this session, seasoned planning personnel offered their detailed analysis of potential locales within Whimble. Drawing from their expertise and reliable evidence, they advised against assigning the Whim_08 location. The planning personnel, with their professional expertise, provided a clear and reasoned recommendation. The personnel's advice against assignment arose from several key elements, each of which requires careful consideration: ? The extent of development clashes with the spatial scheme in place for Whimble. The spatial scheme for Whimble designates limited development to meet local needs. The proposed development at Whim_08a far surpasses this limitation, posing a threat to the village's infrastructure and resources. This conflict with the spatial scheme should not be ignored. ? The site lacks safe and convenient pedestrian entry to essential amenities and resources in the village. The safety of residents, including vulnerable groups, must be a priority. Developing Whim_08a would force residents to use roads lacking adequate pedestrian facilities, creating a dangerous situation. This lack of safe access directly contradicts the Council's stated goals for promoting sustainable transport. ? The site is part of the designated 'Green Band' situated between Whimble and Cranbrook. Green Bands are vital for preserving the unique identity of settlements and preventing urban sprawl. Developing Whim_08a would result in the loss of important green space and the

coalescence of Whimble and Cranbrook, an undesirable planning outcome. This would significantly impact the rural character of our area. ? It forms a vital component of the attractive rural backdrop for the settlement. The rural landscape surrounding Whimble is a valuable asset, contributing to the quality of life and the village's appeal. Development at Whim_08a would damage this landscape, diminishing the village's unique charm and setting. ?A potential impact exists on an unverified wildlife habitat. The Whim_08a site is home to diverse wildlife. Development could have devastating consequences for local ecosystems. Comprehensive ecological surveys are essential before any development decisions are made. Protecting our natural heritage should be a primary concern. ? A section of the land carries a risk of flooding, necessitating further work to ascertain the nature and scope of the risk. Flood risk is a serious issue, and development in flood-prone areas can have severe repercussions. It is unacceptable to proceed without a thorough understanding of flood risks and robust mitigation plans. It's important to note that during earlier public consultations, planning personnel organized a public gathering at Victory Hall in Whimble. At that event, this specific site was never deemed appropriate for development. Indeed, when local inhabitants inquired, the personnel present issued firm denials of its possibility. This inconsistency raises concerns about the reliability of the consultation process. Initially, at the October 1, 2024, meeting, the Strategic Planning Body sided with the personnel's advice and voted against assigning the site. However, I was both surprised and disappointed when, at the subsequent November 1, 2024, meeting, the body reversed its decision and chose to assign a portion of the site, acting contrary to the personnel's guidance. This reversal of the decision is deeply troubling and raises questions about the factors influencing the committee. To this day, no justification or reason has emerged explaining why this site was favored over other sites in Whimble or East Devon. Furthermore, it seems no additional work was completed by personnel to evaluate the potential hazards tied to this site before its assignment. This lack of transparency and evidence-based decision-making is unacceptable. This determination gives the impression the Strategic Planning Body made a hasty choice to allocate additional dwellings throughout the district, without fully considering a carefully constructed proposal or sound reasons based on evidence and facts. Such an approach undermines careful planning and disregards the legitimate concerns of the local community. The site assignment report itself directly posed the question, "If the entire site lacks suitability for assignment, could a smaller section be assigned?" The qualified planning personnel responded with a firm "No." This clear response should have been decisive. Therefore, similar to Whimble Parish Council, I challenge the soundness of any assignment of this site, whether in full or part. Let's revisit the personnel's reasons for advising against assignment, examining them closely, to ensure the Council fully understands the implications of its decision.

Martin Trimblett

Full name: Martin Trimblett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I

feel it necessary to communicate my deep misgivings concerning the East Devon District Council's (EDDC) proposed Emerging Local Plan, most notably policy SD29 and the suggested designation of the Whim_08a tract (Land situated to Bramley Gardens' west). It is my conviction that this designation is fundamentally flawed and lacks a base in sound reasoning. This flawed designation has the potential to cause lasting harm to our community and the surrounding environment. The EDDC Strategic Planning Committee undertook deliberations on the Whimble Site Selection Report during a meeting held on October 1, 2024. During these deliberations, expert planning officials presented their considered evaluations of potential sites within Whimble. Relying on their professional competence and robust evidence, they advised against the designation of the Whim_08 site. These officials, with their specialized knowledge, provided a clear and well-supported recommendation. The officials' counsel against designation was grounded in several vital factors, each of which deserves careful consideration: ? The scale of the intended development is incompatible with the established spatial strategy guiding Whimble. The spatial strategy for Whimble dictates limited development, focused on meeting local needs. The proposed development at Whim_08a far exceeds this limitation, threatening to overwhelm the village's infrastructure and resources. This incompatibility represents a direct contradiction of the planning strategy. ? The site is deficient when it comes to safe and convenient pedestrian access to essential village services and amenities. Pedestrian safety is of paramount importance. The development of Whim_08a would necessitate residents traversing roads that lack adequate pedestrian facilities, posing a significant risk, particularly to vulnerable individuals. This deficiency directly conflicts with the Council's stated aims to promote sustainable transportation options. ? The site itself forms a segment of the designated 'Green Wedge' positioned between Whimble and Cranbrook. Green Wedges play a crucial role in preserving the distinct identity of settlements and preventing uncontrolled urban expansion. Developing Whim_08a would lead to the loss of valuable green space and the merging of Whimble and

Cranbrook, an undesirable planning outcome. This would irrevocably alter the character of the area. ? It constitutes an important part of the attractive rural landscape that provides a setting for the settlement. The rural landscape surrounding Whimble is a valuable asset, contributing significantly to the quality of life for residents and the overall appeal of the village. Developing Whim_08a would result in the degradation of this landscape, diminishing the village's unique charm. ? There is a potential impact that could affect an unconfirmed wildlife site. The Whim_08a site provides habitat for diverse wildlife. Development could have detrimental effects on local biodiversity. Comprehensive ecological surveys are essential before any development decisions are made. The protection of our natural heritage must be a priority. ? A portion of the site carries a risk of flooding, and further investigative work is required to fully comprehend the nature and scope of this risk. Flood risk poses a significant threat, and development in flood-prone areas can have devastating consequences for communities. It is unacceptable to proceed with development without a thorough understanding of the flood risks and the implementation of robust mitigation measures. It warrants mentioning that during earlier public consultations, planning officials hosted a public event at the Victory Hall within Whimble. At this event, this particular site was never entertained as being appropriate for development. In fact, when local residents posed questions about it, the officials present issued strong denials about its potential. This inconsistency undermines the credibility of the consultation process. Initially, on October 1, 2024, the Strategic Planning Committee concurred with the officials' recommendation and voted against allocating the site. However, I was both surprised and disappointed when, at the subsequent meeting on November 1, 2024, the committee reversed its stance and decided to allocate a part of the site, acting in direct opposition to the officials' advice. This reversal of the decision raises serious concerns about the committee's decision-making process and the factors that influenced the change in position. To this day, no justification or sound reasoning has been provided to explain why this site was preferred over other sites in Whimble or the wider East Devon area. Furthermore, it appears that officers did not complete any additional work to properly assess the risks linked to this site before its allocation. This lack of transparency and the absence of evidence-based justification are deeply concerning. This decision creates the distinct impression of the Strategic Planning Committee making a hasty decision to allocate more housing across the district, without adequately considering a carefully developed proposal or robust justification supported by evidence and facts. Such an approach disregards the importance of careful planning and the legitimate concerns of the local community. The site allocation report itself directly addressed the question, "If the whole site lacks suitability for allocation, could a smaller part be allocated?" The professional planning officials provided a firm "No" in response. This decisive response should have been the determining factor. Therefore, much like Whimble Parish Council, I challenge the soundness of any allocation of this site, whether it be full or partial. Let us now revisit the officials' reasons for

recommending against allocation, examining them in detail, to ensure that the Council fully appreciates the implications of their decision.

Harry Trimblett

Full name: Harry Trimblett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am compelled to register my serious reservations regarding the East Devon District Council's (EDDC) proposed Emerging Local Framework, specifically policy SD29 and the intended designation of the Whim_08a parcel (Land situated to the west of Bramley Gardens). It is my firm belief that this designation lacks a solid foundation and is, therefore, unsound. This lack of soundness not only undermines the credibility of the Local Framework but also threatens the very fabric of our community. The EDDC Strategic Planning Committee undertook a review of the Whimble Site Selection Document during their meeting on October 1, 2024. During this review, professional planning officers presented their considered analysis of potential locations within Whimble. Drawing upon their experience and substantiated evidence, they advised against the allocation of the Whim_08 location. Their professional assessment, based on years of expertise, was clear and unequivocal. Their recommendation to reject this allocation was based upon several key factors, each of which carries significant weight and deserves meticulous consideration: The scope of the proposed development is incompatible with the established spatial strategy for Whimble. Our village is designated within the spatial strategy for limited development, focused on meeting local needs. The proposed scale of development at Whim_08a far exceeds what can be considered "limited" and would place an unsustainable burden on our existing infrastructure and community resources. This incompatibility not only disregards the strategic vision for the area but also risks overwhelming the village's character. The location is deficient in safe and convenient pedestrian access to essential services and facilities within the village. The safety of our residents, especially vulnerable groups such as children and the elderly, is paramount. Developing Whim_08a would force residents to navigate narrow, often dangerous roads without adequate pedestrian provisions. This lack of safe access directly contradicts the Council's objectives to promote sustainable transport and healthy lifestyles. The site constitutes a portion of the designated 'Green Wedge' that lies between Whimble and Cranbrook. Green Wedges are crucial for maintaining the distinct identity of settlements and preventing

urban sprawl. Developing Whim_08a would erode this vital green space, leading to the coalescence of Whimble and Cranbrook, a planning outcome that should be avoided at all costs. This would have a detrimental impact on the rural character of our area. It represents an integral component of the visually appealing rural landscape that forms the setting for our settlement. The beauty of our natural environment is not merely aesthetic; it contributes significantly to the quality of life for residents and the attractiveness of our village. Developing Whim_08a would scar this landscape, diminishing the unique character and setting of Whimble. There exists a potential impact upon an unconfirmed wildlife site. It is imperative that we protect our natural heritage and biodiversity. The Whim_08a site is known to harbor a variety of wildlife, and development could have devastating consequences for local ecosystems. Further ecological surveys are essential before any development decisions are made. A section of the land is vulnerable to flooding, necessitating further investigation to ascertain the nature and extent of the associated risk. Flood risk is a serious concern, and development in areas prone to flooding can have severe consequences for both residents and property. It is unacceptable to proceed with development without a comprehensive understanding of the flood risks and appropriate mitigation measures. It is important to recall that during earlier public engagement, planning officers conducted a public forum at Victory Hall within Whimble. During that event, this specific site was never entertained as a suitable option for development. Indeed, when local residents raised direct inquiries, the officers in attendance explicitly denied its potential consideration. This inconsistency in the Council's position is deeply troubling. Initially, at the meeting held on October 1, 2024, the Strategic Planning Committee aligned themselves with the officers' professional recommendation and voted against the allocation of the site. However, I was greatly surprised and disappointed when, at the subsequent meeting on November 1, 2024, the committee executed a complete reversal and decided to allocate a portion of the site, thereby contradicting the officers' considered advice. This abrupt about-face raises serious questions about the decision-making process and the factors influencing the committee's change of heart. Regrettably, no clear justification or rationale has been provided to explain why this particular site was favored over alternative sites, either within Whimble itself or the wider East Devon area. Furthermore, it appears that no supplementary work has been undertaken by officers to thoroughly assess the potential risks linked to this site prior to its allocation. This lack of transparency and evidence-based decision-making is unacceptable. This decision gives the distinct impression that the Strategic Planning Committee has acted with undue haste in their perceived need to allocate additional housing throughout the district, without affording appropriate consideration to a fully developed proposal or sound justifications rooted in evidence and factual data. This approach not only undermines the integrity of the planning process but also disregards the legitimate concerns of the local community. The site allocation report itself explicitly addressed the query: "If the whole site is not suitable for allocation, could a

smaller part be allocated?" The considered response from the professional planning officers was an unequivocal "No." This clear and definitive statement should have served as the final word on the matter. Consequently, I, in alignment with Whimble Parish Council, challenge the very soundness of any allocation pertaining to this site, whether in its entirety or only partially. Let us now revisit the officers' stated reasons for recommending against the allocation, and examine these in greater detail, ensuring that the Council fully understands the implications of their decision.

Peter Trudgill

Full name: Peter Trudgill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient accessible town, with their amenities the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 for housing allocation should be selected. One deemed suitable, achievable & available in the HELAA. Exmo_20 would cause harm to adjacent pebblebed heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of local plan and not in accordance with the mitigation strategy.

Exmo_20 would cause harm to heritage assets, like St John in the Wilderness grade II listed church and churchyard, drastically altering the attractive rural setting which currently exists - contrary to POLICY HE02 Contrary to POLICY OL01, tranquility, wildness and dark skies would be destroyed and adjacent designated wildlife sites would be detrimentally affected. Exmo_20 development would be in conflict with Strategic Nature Area 368, fragmenting and isolating habitats & destroy wildlife corridors, contrary to paragraph 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9 Exmo_20 also in conflict with POLICY OL09 and POLICY PB04 as the habitats regulations assessment (30.1.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East

Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test
Development of Exmo_20 on heavy clay subsoil, with ineffective soakaway would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. The isolated location is unsustainable development so people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (& too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

In conclusion - that stretch of road across the common between Exmouth and Budleigh is crucial to maintain the rural attractiveness, existing habitats and wildlife, the nearby local businesses and reservoir in this AONB.

Until the sewerage, facilities and infrastructure is in place, no proposal of this size should be considered.

The sewerage system cannot cope as it is.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Rachel Trudgill

Full name: Rachel Trudgill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient accessible town, with their amenities the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 for housing allocation should be selected. One deemed suitable, achievable & available in the HELAA. Exmo_20 would cause harm to adjacent pebblebed heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of local plan and not in accordance with the mitigation strategy.

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In conclusion - that stretch of road across the common between Exmouth and Budleigh is crucial to maintain the rural attractiveness, existing habitats and wildlife, the nearby local businesses and reservoir in this AONB.

Until the sewerage, facilities and infrastructure is in place, no proposal of this size should be considered.

Given the current sewage issues affecting Exmouth and Budleigh, this proposal is madness

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rachel Trudgill

Proposal:

5. Development in the Towns and Villages

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exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. The isolated location is unsustainable development so people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (& too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

In conclusion - that stretch of road across the common between Exmouth and Budleigh is crucial to maintain the rural attractiveness, existing habitats and wildlife, the nearby local businesses and reservoir in this AONB.

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Given the current sewage issues in Exmouth and Budleigh, this proposal is madness.

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Full name: Rachel Trudgill

Proposal:

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Exmo_20 would cause harm to heritage assets, like St John in the Wilderness grade II listed church and churchyard, drastically altering the attractive rural setting which currently exists - contrary to POLICY HE02. Contrary to POLICY OL01, tranquility, wildness and dark skies would be destroyed and adjacent designated wildlife sites would be detrimentally affected. Exmo_20 development would be in conflict with Strategic Nature Area 368, fragmenting and isolating habitats & destroy wildlife corridors, contrary to paragraph 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9. Exmo_20 also in conflict with POLICY OL09 and POLICY PB04 as the habitats regulations assessment (30.1.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. Development of Exmo_20 on heavy clay subsoil, with ineffective soakaway would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with Paragraph 11.2. The isolated location is unsustainable development so people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (& too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

In conclusion - that stretch of road across the common between Exmouth and Budleigh is crucial to maintain the rural attractiveness, existing habitats and wildlife, the nearby local businesses and reservoir in this AONB.

Until the sewerage, facilities and infrastructure is in place, no proposal of this size should be considered.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Glenn Tucker

Full name: Glenn Tucker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_08 and Exmo_16 are greenfield sites and a haven for wildlife and should not be developed. Additionally, the local infrastructure (drains, sewers, roads etc) is unable to support additional homes in this part of Exmouth. Traffic at Littleham Cross, in particular, is already chaotic (since Plumb Park was developed) and the South West Water sewage problems in Exmouth (Maer Lane) are well documented.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Caroline Tulett

Full name: Caroline Tulett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The housing development etc proposed at Exmo_20 could and should be located somewhere else where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 as proposed is contrary to the Policy PB01 of the local plan and not in accordance with the mitigation strategy. The peacefulness, “wildness and dark skies” of the countryside would be ruined which is against POLICY OL01. Wildlife is crucial and this development would split wildlife corridors and isolate habitats contrary to PARAGRAPH 13.23. Old trees and hedgerows cannot be replaced and it would be contrast to PARAGRAPH 13.9. The habitats regulation assessment from Jan 25 confirms that there may be adverse effects to air quality. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. There would be a flooding risk in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and make traffic congestion worse as it is isolated and further than 800m to existing services which are already busy such as GP and dentist. The main way of getting to Exmo_20 is much closer to Budleigh Salterton than Exmouth making it the town of choice for new residents there. The services wouldn’t cope but also Budleigh and Exmouth would effectively coalesce, contrary to POLICY OL05 of the local plan. Exmo_20 is contrary to policy in so many areas.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan to ensure services, wildlife, traffic, air quality and the Pebblebed Heaths are protected.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sarah Turl

Full name: Sarah Turl

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: “Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8

years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as

possible.: "The proposed housing allocations in Exmouth ... A town currently with insufficient sewerage infrastructure, demonstrably broken sewage network and demonstrably under capacity of the sewage treatment facility so without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan."

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy does not take into account the already acknowledge failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

Dr Robert Turner

Full name: Dr Robert Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I would like to voice my strong objection to these proposed developments which would be built in a rural area on productive farmland and adjacent to the historic settlement of St John's in the Wilderness

> Exmouth is already one of the largest towns in Devon and SWW, as we know from the many news reports are finding it impossible to prevent large and regular raw sewage spills into the sea around Exmouth and Budleigh Salterton.

> Further significant development will only make that worse meaning that the local coastline and sea, one of the big attractions for tourists visiting this area and providing an essential income, will become unusable. Fishing and shellfish collection both commercial and leisure based will inevitably be severely impacted without mentioning the health impacts.

> The local infrastructure in Budleigh which will be the closest town to the development, is not sufficiently developed to cope with this large increase in population and will be overwhelmed. There is no major road between Exmouth or Budleigh and the M5. The B3179 has already become dangerously busy with large articulated trucks inappropriately using it to avoid the building congestion on the A376. These 2 roads were never intended to cope with the already massive traffic flow which will only increase with this proposed development.

> Until very recently this land had two protections to prevent building: National Landscape and Coastal Preservation Area.

> EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it.

> If house building and light industry on Exmo_17 were allowed, it would take away part of the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. > > Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. > > A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. > I understand the need for increased housing but these developments are ill thought through and in the wrong place.

> Any further housing in Devon should be built on brownfield sites with preplanned and well developed new infrastructure to cope with the demands of the additional population.

Mary Turner

Full name: Mary Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Chapter 5, Development in the Towns and Villages" POLICY SD01 and SD10
(development proposals off Meeting Lane, Lymptstone.

- I do not believe this policy is sound. The infrastructure does not exist to support these developments and they risk damaging important wildlife habitat (particularly for bats) and negatively impacting flood risk due to run off from increased hardstanding.

GH/ED/72a and GH/ED/73 should be located in a different site. This site sits within the coastal protection area and is also adjacent to the pebblebed heath. The little cation of these sites would cause fragmentation to and the isolation of habitats. Wildlife corridors are an important element for wildlife and their destruction is contrary to paragraph 13.23 of the local plan. Wildlife corridors around these sites offer important routes for wildlife to travel between the Exe estuary at Lymptstone up to the pebblebed heath and the common. They are irreplaceable habitats containing veteran trees and mature, species rich hedgerows across the site contrary to paragraph 13.9.

Both sites are upstream of the world renowned RAMSAR Exe estuary mudflats which would result in the loss of filtration in an area which regularly floods. Damaging run-off would then flow from these sites down into the mudflats and this would be destructive to this world renowned RAMSAR habitat. This is in conflict with policy AR01B.

The allocation of both these sites in the local plan is contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe RAMSAR area around the village of Lympstone is visited by tourists and ornithologists from all over the world and it is vitally important that they are protected longterm.

Congestion of the already overused A376 would be increased by the additional traffic.

Lympstone is a small village and although it has a train station the majority of journeys to work, school and weekly shop are done by road. The increase in traffic congestion is in conflict with paragraph 11.2.

This development is unsustainable, and residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6.

Lympstone has only one direction out by road, via the A376. The access lanes already flood regularly and can make the village inaccessible. These sites in these locations will exacerbate these flooding and access issues.

The decision to include 72a is controversial since it is far from the village of Woodbury despite being in Woodbury parish. In practice residents would need to cross the A376 and navigate several miles of lanes to reach Woodbury services, so residents would inevitably put additional pressure on already full services and infrastructure such as school, doctor, parking, flooding etc. This is against policy OL05.

Site LYMP_07

LYMP_07 is upstream of Lympstone on the main rainwater catchment area of Wotton Brook. The subsoil here is of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Lympstone Village. This is in conflict with POLICY ARO1B.

LYMP_07 has been assigned in the local plan in contravention of strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe area around the village of Lympstone is a world renowned RAMSAR site on the Exe estuary which is visited by tourists and ornithologists from all over the world.

To develop LYMP_07 would isolate and fragment habitats, destroying vital wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. These areas include veteran trees and species rich hedgerows and runs contrary to PARAGRAPH 13.9.

LYMP_07 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development which would require residents to travel. People would need to travel far further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too steep and too far from a town centre for people to allow most people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The use of Exmouth facilities and services would lead to coalescence of Lympstone and Exmouth, contrary to POLICY OL05 of the local Plan. The Village of Lympstone and town of Exmouth have fought hard over decades to protect both settlements from coalescence.

Chapter ‘ Our outstanding landscape’

The following sites LYMP_07, GH/ED/72a and GH/ED/73 have been assigned in the local plan contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe estuary is an important ecological site with rare and protected species.

John Turner

Full name: John Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Paul Turner

Full name: Paul Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Access to Exmo-20 is much closer to Budleigh Salterton . Thus all local services there would be the preferred choice. This undermines the settlement hierarchy contrary to policy OL05 of the local plan. An alternative site to Exmo-20 should be found which doesn't impact Pebblebed Heaths This site is contrary to HELAA,the site selection methodology and policy PB01. So not in accordance with Mitigation Hierarchy to select avoidance over mitigation.

Exmo 20 would impact St John in the Wilderness church and the rural nature of it's services

Exmo -20 would affect the tranquility, wildness and dark skies again contrary to OL01.

Wildlife corridors would be destroyed contrary to the Local Plan

The heavy clay subsoil with ineffective soak aways would exacerbate flood risk through Exmouth.

Increased car traffic which inevitable in view of distance to amenities, steep inclines meaning no walking or cycling would be likely would cause congestion and pollution-contrary to Policy TR01.

Sewage treatment would impact an already over stressed system

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To prevent over use of B3179, access elsewhere Greatly reduce the size of the scheme. If more people need to move to the area, move to a plan providing transport, schools, shops and hospitality, doctors and all necessary services.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a member of the society impacted by this plan I wish to have a say in the outcome of the planning process.

Emily Turner

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of EXMO_20 is in conflict with policies SP01, TR01, TR03, and paragraphs 11.2, 11.6, 3.34 and 2.6 of the Local Plan. ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location. (POLICY SP01 proposes to promote the most significant levels of development at the principal centre of Exmouth).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mary Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Chapter 5, Development in the Towns and Villages" POLICY SD01 and SD10
(development proposals off Meeting Lane, Lympstone.

- I do not believe this policy is sound. The infrastructure does not exist to support these developments and they risk damaging important wildlife habitat (particularly for bats) and negatively impacting flood risk due to run off from increased hardstanding.

GH/ED/72a and GH/ED/73 should be located in a different site. This site sits within the coastal protection area and is also adjacent to the pebblebed heath. The little cation of these sites would cause fragmentation to and the isolation of habitats. Wildlife corridors are an important element for wildlife and their destruction is contrary to paragraph 13.23 of the local plan. Wildlife corridors around these sites offer important routes for wildlife to travel between the Exe estuary at Lympstone up to the pebblebed heath and the common. They are irreplaceable habitats containing veteran trees and mature, species rich hedgerows across the site contrary to paragraph 13.9.

Both sites are upstream of the world renowned RAMSAR Exe estuary mudflats which would result in the loss of filtration in an area which regularly floods. Damaging run-off would then flow from these sites down into the mudflats and this would be destructive to this world renowned RAMSAR habitat. This is in conflict with policy AR01B.

The allocation of both these sites in the local plan is contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe RAMSAR area around the village of Lympstone is visited by tourists and ornithologists from all over the world and it is vitally important that they are protected longterm.

Congestion of the already overused A376 would be increased by the additional traffic.

Lympstone is a small village and although it has a train station the majority of journeys to work, school and weekly shop are done by road. The increase in traffic congestion is in conflict with paragraph 11.2.

This development is unsustainable, and residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6.

Lympstone has only one direction out by road, via the A376. The access lanes already flood regularly and can make the village inaccessible. These sites in these locations will exacerbate these flooding and access issues.

The decision to include 72a is controversial since it is far from the village of Woodbury despite being in Woodbury parish. In practice residents would need to cross the A376 and navigate several miles of lanes to reach Woodbury services, so residents would inevitably put additional pressure on already full services and infrastructure such as school, doctor, parking, flooding etc. This is against policy OL05.

Site LYMP_07

LYMP_07 is upstream of Lympstone on the main rainwater catchment area of Wotton Brook. The subsoil here is of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Lympstone Village. This is in conflict with POLICY ARO1B.

LYMP_07 has been assigned in the local plan in contravention of strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe area around the village of Lympstone is a world renowned RAMSAR site on the Exe estuary which is visited by tourists and ornithologists from all over the world.

To develop LYMP_07 would isolate and fragment habitats, destroying vital wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. These areas include veteran trees and species rich hedgerows and runs contrary to PARAGRAPH 13.9.

LYMP_07 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development which would require residents to travel. People would need to travel far further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too steep and too far from a town centre for people to allow most people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The use of Exmouth facilities and services would lead to coalescence of Lympstone and Exmouth, contrary to POLICY OL05 of the local Plan. The Village of Lympstone and town of Exmouth have fought hard over decades to protect both settlements from coalescence.

Chapter ‘ Our outstanding landscape’

The following sites LYMP_07, GH/ED/72a and GH/ED/73 have been assigned in the local plan contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe estuary is an important ecological site with rare and protected species.

Catherine Mary Turner. (aka Kate Somerby)

Full name: Catherine Mary Turner. (aka Kate Somerby)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High St, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Catherine Mary Turner. (aka Kate Somerby)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SS1/SAC/SPA/NNR) due to Exmo-20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a resident of Budleigh Salterton, and Chair of Budleigh Music Festival I have an interest in any future developments that will affect the reputation and accessibility of this volunteer led initiative, as well as an interest in protecting the local environment for all members of our community.

Jenyth Turner-Steel

Full name: Jenyth Turner-Steel

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section. However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.

EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.

- It's well documented that roads and homes often flood with raw sewage.
References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.

- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not

consistent with the local plan's stated vision and strategy and by extension with national policy.

- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45 Disproportionate allocation of houses compared to local need: Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.

- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.

- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.

- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton. Employment site Otry_20:
- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton. Employment site Otry_20:
- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls,

blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.

- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.

- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.

- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.

- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a

sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

Andrew Tyerman

Full name: Andrew Tyerman

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: It would also appear that EEDC has failed to comply with section 33A of the PCPA which requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan.

We know that a follow up Water Cycle Report has been Commissioned by EDDC and was due to be completed last year but this does not appear in the draft Plan and has not been shared with the community. This new Water Cycle Study is a key part of the evidence required for the Local Plan going forward to reflect how this will ensure adequate capacity for waste water treatment in East Devon.

I would strongly urge the Planning Inspector to consider these omissions and request urgent action by EDDC in conjunction with South West Water to address and assess sewage infrastructure future capacity. If required I would be happy to submit further evidence to support this.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: In conjunction with a large group of East Devon residents I am concerned the consultation may not be based on sound evidence in relation to the waste water infrastructure in the area.

A previous Water Cycle Study (circa 2010) commissioned by East Devon District Council (EDDC) was predicated on the building of a new waste water treatment works (WWTW) to serve the new Cranbrook community. This plan was subsequently dropped by South West Water and the sewage diverted to Countess Wear. This study specifically assessed the projected capacity for waste water treatment over the coming years and (with the inclusion of the new works) concluded that several locations would be over capacity by 2025 including Maer Lane STW. Since the time of the study the new WWTW was not built, the population in East Devon has increased by more than twice the national average (Census data 2011 -21) and the published performance data in Exmouth shows a large increase in the use of storm overflows discharging untreated sewage into the sensitive estuary and designated bathing waters. This clear evidence, of an already inadequate sewerage infrastructure, is entirely missing from the draft Local Plan. The leader of the council wrote to Government last year citing the situation as an 'emergency' yet this is not reflected in the Local Plan.

David Valentine

Full name: David Valentine

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

OBJECTION - LOCAL PLAN CONSULTATION DRAFT

STRATEGIC POLICY SD03 : Honiton and it's development allocations. Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be

unsurmountable. If the site cannot come forward within the plan period for development then it should not be allocated.

- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation
- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH - RESIDENTIAL I OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria;
- The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
- Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.
- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment

- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Delete Land west of Hayne Lane Policies Gitti_03, Gitti_04, Gitti_05

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure full understanding of the issues raised in the objections

Nathaniel Vanstone

Full name: Nathaniel Vanstone

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To whom it may concern,

As extremely concerned neighbouring residents and business owners at Little Loxbrook Farm, Broadclyst there are some very serious and worrying environmental and safety issues regards the proposal of 142 homes to be built at Winter Gardens. Firstly I would like to thank you for the opportunity to share our views and as we have lived at Little Loxbrook Farm since 2012. Since moving to Broadclyst and building a very successful equine business we have seen many things change and had to adjust to the increased flood risk and wreckless traffic speeds on the road between Cranbrook school and Little Loxbrook Farm. As you will see from the pictures and videos I have attached with a Google map screenshot also highlighting the fields and the stretches of road which fully flood due to our ever changing climate and more extreme wet weather events happening more frequently we are becoming more unviable. (You say you want local businesses to be successful and benefit?) The water levels rise so quickly in the river and are getting worse by the year with the water table barely 1 meter below ground level in a dry summer. I have two serious concerns which need very important consideration, firstly having been in the groundworks and building trade for over 25 years I know that the area proposed at Winter Gardens for 142 homes will have to have a huge rain water drainage provision with the volumes we have experienced getting worse especially the huge amount in a short period of time. Where is this RAIN WATER going to be dispersed without overflowing and mixing with the already stretched SEWAGE infrastructure that services Broadclyst which may I point out is already being pumped out by tankers probably because of the water table issue which can never be changed. The pressure 142 homes will put on local wildlife, Surrounding land, Existing residents and also the

New Homes proposed will be disastrous and totally wreckless. In regards to traffic I recently had a security camera system fitted which is set off by passing cars on a weekday roughly 900 times a day, its a country lane where I've seen walkers, cyclists, horseriders and other motorists run off the road by the speeds and pure ignorance and total disregard for the local people of Broadclyst and the businesses that support the historic village. It's become so dangerous we have personally had injuries caused by drivers and its only getting worse. There are also not many days now where there isn't a high speed police chase that passes our doors and one day soon I am extremely concerned there will be a fatality. The road conditions are horrific with potholes with no access for any pedestrian, cyclist, horserider or motorist to avoid a speeding driver. The roads around Broadclyst Secondary school and primary school can be at a standstill at school start and finish times with roads blocked, children dodging traffic and impatient rat run users (soon to be an accident with the lack of pavements and parking for both the schools) I put this to you that any houses built at Winter Gardens will destroy Broadclyst, its surrounding environment and the ground itself is not capable of taking the increased pressure from RAINWATER and EXTRA SEWAGE let alone the TRAFFIC and PUBLIC SAFETY.

[There are additional video file which could not be uploaded to commonplace which can be found in the Local plan inbox if required, they are videos of flooding in the area.]

Bex Vanstone

Full name: Bex Vanstone

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I'm writing to strongly object to the housing going up in winter gardens.

We have lived at little Loxbrook farm (Ex53bn) since 2012 , our business is having horses on livery and breaking (baby horses) and schooling problem horses. when we first arrived the country lanes were quiet with traffic but slowly as Cranbrook went up turned dangerous for the horses and people.

We have had extreme accidents resulting in hospital stays and on one occasion a horse loosing its life at a later date due to injury from dangerous driving. I can confirm that horse and riders are MEANT to be the most protected on the roads?

We personally are always polite and move on to a safe place as soon as we can for road users and thank them for their patience , never rude or ignorant keeping their time longer than needed.

We have been run off the road by angry drivers and tailed by drivers that come back to make fun when the horses are spooked.

Are you trying to get rid of local businesses?

Or have someone seriously hurt (which they have been) or even worse killed?

I've seen walkers/ cyclists/ riders / wheel chair users nearly run over / abused/ shouted at and physically hit by the drivers which seem to be extremely angry!

The sewage is a massive problem constantly having to be pumped out and won't cope with more houses as can't now!

The flooding is horrendous (all pictures/ videos attached)

What about the wildlife?

What are you going to do about all of this?

Sandra Anne Venton

Full name: Sandra Anne Venton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: My assumption is that it is compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The part of Chapter 5 is not sound. In October 2024, the professional judgement of the planning officers was that the site was NOT recommended for the following reasons which REMAIN VALID: (1) the scale of the development is incompatible with the spatial strategy; (2) the site lacks safe and convenient pedestrian access to services and facilities in the village; (3) the site forms part of the 'Green Wedge' between Whimble and Cranbrook; (4) the site forms an important part of the very attractive rural landscape setting for the settlement; (5) the potential impact on unconfirmed wildlife site; (6) part of the site is at risk of flooding and needs more detailed consideration before it is given to allocation. All six of these are of concern but especially the fact that the development goes against the spatial strategy and far exceeds the local needs – by 45 times – the assessed local need is for 4 affordable homes. As a resident of Bramley Gardens I am especially concerned that the impact of the development on the wildlife on this site which is home to bats, owls, woodpeckers, deer and badgers. There is also a flood risk which needs further assessment. However, my greatest concern is that this development is within the green wedge and its development would lead to settlement coalescence between Whimble and Cranbrook. This goes against EDDC Emerging Local Plan Policy OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The allocation of this site goes against the professional judgement of the Planning officers. The development would be better placed elsewhere in Whimple or in Cranbrook or elsewhere where there is appropriate infrastructure for example, the Cobdens expansion of Cranbrook and also, the site east of Church Road close to the established infrastructure near the Hand and Pen.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: My assumption is that it is compliant.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Stephen Venton

Full name: Stephen Venton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation and policy is not based on solid evidence. In October 2024, the professional judgement of the planning officers was that the site was NOT recommended for the following reasons which REMAIN VALID: (1) the scale of the development is incompatible with the spatial strategy; (2) the site lacks safe and convenient pedestrian access to services and facilities in the village; (3) the site forms part of the 'Green Wedge' between Whimble and Cranbrook; (4) the site forms an important part of the very attractive rural landscape setting for the settlement; (5) the potential impact on unconfirmed wildlife site; (6) part of the site is at risk of flooding and needs more detailed consideration before it is given to allocation. Furthermore, with respect to (1), the EDDC Site Allocation Report for Whimble states 'Whimble is a is a 'Tier 4' settlement, where the draft local pan seeks to promote limited development to meet local needs. A recent assessment has identified a local need for 4 affordable homes in the next 5 years. The development of up to 180 dwellings on Whim_08 is considered to be excessively high in relation to the scale of the existing village and local needs. In addition, with respect to (3), the EDDC Emerging Local Plan Policy OL05: Green Wedges states 'Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.' The site is within the green wedge and its development would lead to settlement coalescence between Whimble and Cranbrook.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The site is not appropriate for development as set out in response to the previous questions and its allocation goes against the professional judgement of the Planning officers. The development would be better placed elsewhere in Whimble or in Cranbrook or elsewhere where there is appropriate infrastructure – especially with respect to roads/ footpaths – for example, the Cobdens expansion of Cranbrook and also, the site east of Church Road close to the established infrastructure near the Hand and Pen.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Rebecca Venton

Full name: Rebecca Venton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: My assumption is that it is compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation and policy is not based on solid evidence. In October 2024, the professional judgement of the planning officers was that the site was NOT recommended for the following reasons which REMAIN VALID: (1) the scale of the development is incompatible with the spatial strategy; (2) the site lacks safe and convenient pedestrian access to services and facilities in the village; (3) the site forms part of the 'Green Wedge' between Whimble and Cranbrook; (4) the site forms an important part of the very attractive rural landscape setting for the settlement; (5) the potential impact on unconfirmed wildlife site; (6) part of the site is at risk of flooding and needs more detailed consideration before it is given to allocation. Furthermore, with respect to (1), the EDDC Site Allocation Report for Whimble states 'Whimble is a is a 'Tier 4' settlement, where the draft local pan seeks to promote limited development to meet local needs. A recent assessment has identified a local need for 4 affordable homes in the next 5 years. The development of up to 180 dwellings on Whim_08 is considered to be excessively high in relation to the scale of the existing village and local needs. In addition, with respect to (3), the EDDC Emerging Local Plan Policy OL05: Green Wedges states 'Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.' The site is within the

green wedge and its development would lead to settlement coalescence between Whimble and Cranbrook.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The site is not appropriate for development as set out in response to the previous questions and its allocation goes against the professional judgement of the Planning officers. The development would be better placed elsewhere in Whimble or in Cranbrook or elsewhere where there is appropriate infrastructure – especially with respect to roads/ footpaths – for example, the Cobdens expansion of Cranbrook and also, the site east of Church Road close to the established infrastructure near the Hand and Pen.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: My assumption is that it is compliant.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

John Vieth

Full name: John Vieth

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I object strongly to further development to the North of Seaton, reducing the green wedge to Colyford.

A few years ago, similar proposals on this land were rejected after a great deal of investigation, review and cost. During these financially challenging times we cannot afford to 'go round the houses' again. It is a worthless exercise, the majority of the public don't want it and the area does not need it. It's a waste of money that we don't have.

This important green space forms a division between Seaton and Colyford. It provides a safe corridor for birds, bats and badgers. I have seen hares, deer, curlews, lapwings, egrets, foxes, rabbits, geese and pheasants on these fields. This important wildlife will disappear forever if these houses are built.

Please don't believe that there is a housing shortage in Seaton. This morning, on Rightmove, there are 248 properties for sale in Seaton. The prices range from £70k to £1m; the full spectrum.

Colyford cannot cope with any increase in traffic that this development will inevitably bring. Come and stand on Swan Hill (A3052), or at the junction with Harepath Road or Seaton Road by Colyford Post Office when 1100 pupils arrive at or depart the grammar school. You will witness the road being practically closed as they get on and off up to 15 buses twice a day. It's an accident waiting to happen.

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

Please do allow further development in this area, it is important for future generations and wildlife.

Mark Vinnicombe

Full name: Mark Vinnicombe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

We regularly use the cycle path and also walk our dogs. It truly is a beautiful part of Exmouth and we really need to save it before it's too late.

Lindsey Waddell

Full name: Lindsey Waddell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

JIM WADDELL

Full name: JIM WADDELL

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

When critical infrastructure such as sewerage disposal, as managed by SWW, is in utter chaos with no coherent timely plan for necessary improvement, how can any large increase in inputs that such development would cause to the present system be seriously contemplated?

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Paul Ashley Waite

Full name: Paul Ashley Waite

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We fully endorse the Whimple Parish Council response to these proposals on the grounds of soundness. In addition to the points made by the Parish Council, we would also like to add the following: 1/ Pedestrian access: this will not only impact on the residents of the proposed new properties, but will also significantly increase the risks to all pedestrians due to the extra volume of traffic that will be generated within the village. 2/ Parking: the proposed development of 50 houses will likely require space for 75+ additional vehicles. Unless there is specific allocation within the development itself, there is no obvious space for these additional vehicles within the village. 3/ There will presumably be an increase in demand for bus services into Exeter. These can only be accessed at Hand and Pen and requires about a mile walk along a narrow, winding, unlit, and un-paved stretch of Church Road. This is unsafe. 4/ We live in Webbers Close which is to the north of the proposed development and sits at a lower level than the proposed site, adjacent to the stream. This area has previously been identified as a potential flood risk, so the construction of 50 dwellings above the level of Webbers Close would likely increase this risk.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

We again endorse Whimple Parish Council's response to this question. The main improvements required to address our additional issues would be improved pedestrian facilities on Church Road, including paving and lighting, additional parking facilities, potentially as part of the new development, e.g. additional village car park, bus routes extended into Whimple Village and reassurances of measures proposed to alleviate the raised risk of flooding to Webbers Close.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Alan Wake

Full name: Alan Wake

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). the development of Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with mitigation strategy.

Exmo_20 would blight the "tranquility,wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats, destroy wildlife corridors contrary to PARAGRAPH 13.23 of the Local Plan. Also, contrary to PARAGRAPH 13.9 it would damage irreplaceable habitats, aged trees and hedgerows abundant with many species across the site, contrary to PARAGRAPH 13.9.

The Habitat regulations assessment(30.01,25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and PB004.

Contrary to POLICY HE02 Exmo_20 would have significant adverse effects on St.John in the Wilderness GRADE11* listed church and churchyard, altering dramatically altering

the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is sited upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This conflicts with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is an untenable development. It is an extremely isolated development and residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. it is too far (and too steep) from any town centre for residents to use either walking or cycling as transport of choice. This is contrary to POLICY TR01.

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh Salterton the most conveniently accessible town. The services and infrastructure of Budleigh, High Street, Doctor's, School etc would be the obvious choice for residents of Exmo_20. the Doctors and school are just about coping as is without the addition of residents of an additional 700 houses. This as an outcome would lead to an amalgamation of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan. Reduce the size of EXmo_20. Do not access the site via B3179. Do not access site via Southern Wood. Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

J Jeremy Wakeling

Full name: J Jeremy Wakeling

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Draft Emerging Local Plan 2020-2040 states as follows in relation to what I shall refer to as the Orchard Site. Land north of Behind Hayes (Otto_01) I support the over-riding policy objective to provide additional housing in line with national policy and agree that further housing should be built in Otterton. The issue is where this would best take place.

The 2023 Consultation In 2023, a consultation took place seeking feedback as to which of five sites would best be targeted for redevelopment. These were identified as Otto_01, 02, 03a, 03b and 04. The product of the consultation was outlined in a response made by the Parish Council in a report to EDDC dated 15 January 2023. In that report the Orchard Site was ranked 4th in terms of preference for redevelopment. (Ranked 1-5 the most preferred has the lowest number.) Ranking 1. Otto_04 85 2. Otto_02 87 3. Otto_03a 98 4. Otto_01 113 5 Otto_03b 133 The preferred sites were those at the northern end of the village. Otto_04 This is the derelict site on Ottery Street adjacent to the most recent Rydon Orchard development that has generally met with approval in the village. Otto_02 This is the site adjacent to the North Star engineering works and largely level. By some margin, Otto_1, was not seen as a suitable or preferred target for development.

The location of Rydon Orchard, Otto-04, the North Star Engineering Works and Otto_02 are shown below. Quite why these sites were not selected is unclear when they are within the Settlement Boundary, adjacent to essential services and located where any scheme would have no adverse affect upon the landscape nor impact upon heritage assets located in the village.

Otto_1 – The Orchard Site

The votes against the Orchard Site would have represented local appreciation of the issues that arise from any attempt to develop the site. Some of these impact directly upon the costs of such a scheme and ultimately, its viability. If a scheme is not viable, it will not be built, and the objectives of the underlying policy will fail. The particular issues that detract from the decision to allocate the Orchard Site and will impact upon viability are these:

Contours of the Site The site slopes steeply from south to north and particularly towards the northwestern boundaries. Parts of the site are known to be unstable and have shown a propensity to slip after wet weather.

Run-off Any scheme will substantially increase the surface water run-off and there is the prospect of flooding affecting those properties lying to the north of the site.

Surface and Foul Water Drainage The concerns over flooding are exacerbated by the knowledge that the current surface and foul water drainage systems in the village are already overloaded. This is especially in the summer months when additional pressure is placed on the system by the Ladram Bay Holiday and Caravan Park. Before any further development takes place in the village, this issue requires resolution. Such additional cost might fall on the developer.

Access The draft plan envisages access to the site via Orchard Drive, correctly acknowledging the inherent unsuitability of attempting access from Behind Hayes that is narrow and single carriageway. But even the roadway from Orchard Close is likely to require upgrading thereby adding to the costs of the scheme.

The draft plan as quoted above [para.1.2] acknowledges that the site is unsuitable for development on a number of grounds:

The ‘Significant heritage and landscape constraints’ The Orchard Site directly abuts the former Houstern Farm of which Houstern Farmhouse formed part. This is one of the

oldest houses in Otterton dating from 1550. Any scheme will overshadow and degrade the property as a heritage asset.

A key element of Otterton's heritage is that a number of farms were sited on Fore Street with their land rising up the slopes behind them. In the case of Houstern Farmhouse, this included the ancient orchard, the remnants of which are still apparent in the old apple trees on the site. Part of the essential character of the village is its lineal nature with the original houses fronting Fore Street and their gardens, farms and open space behind.

The preservation of the Orchard site as open space is essential to preserve the historical nature of the village and whilst the Draft Plan states that any 'Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets', it is difficult if not impossible to see how this can actually be achieved.

Conclusions

Looking at a plan of the village, one only sees it in two dimensions and the attraction of infill within the settlement boundary might look neat and logical, but that is not the case.

The Draft Plan makes plain a number of impediments to any development of the site and goes so far as to declare that the northwestern part of the site is not appropriate for built development. The Draft Plan, by implication, divides Otto_1 into two parts that might be described as the Orchard Site to the west and the Paddock site to the east. This said, I would submit that the same issues apply to the entirety of the site Otto_1.

On top of the issues raised in the Development Plan, are those I listed above which would significantly add to the costs of the scheme and in my view, are likely to render it unviable, especially when there is likely to be an additional need to accommodate Social and Affordable Housing.

If the objective is to see the provision of new housing in the village, the most obvious route is to identify and facilitate the development of sites that are suitable and more readily built out. In 2023, Otterton residents recognised which of the options identified should be preferred, and they are right. If local consultation is to mean anything, the sites to be allocated should be those to the north of the village, not least because the Orchard/Paddock site is so plainly unsuitable for development and the economics stand every prospect of rendering such development unviable.

Matthew Waldron

Full name: Matthew Waldron

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Given the limited details that relate specifically to this area, I don't think there are any legal compliance issues.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Regarding the section on “land west of Hayne Lane (Gitti_03, Gitti_04, and Gitti_05),” where I also live, the draft states: “This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented.”

This statement is particularly important as this area will accommodate the largest share of Honiton’s development—over 300 of the proposed 800+ homes—alongside an expansion of the trading estate.

I want to clarify that I do not oppose building more houses; I recognise that this needs to happen all over the country. However, beyond ensuring a good standard of new homes, I expect the supporting infrastructure, accessibility, and impact on nearby communities to be handled with fairness and due diligence.

I hope more details will be provided because, as it stands, the draft only states: “It is expected that vehicular access to the residential development will be via the existing estate to the north (i.e., via Meadow Acre Road).”

This is a serious concern. The development in this area has not been planned with long-term viability in mind. Only last year, the community was consulted, and I have already raised concerns about the existing issues.

Currently, access to the area is inadequate due to:

1. Narrow roads—Hayne Lane has short sections for two-way traffic and is constrained by the railway bridge, and Meadow Acre Road is not wide enough for two-way traffic, especially with parked cars on both sides.
2. Limited entry points—Access is only via Beech Walk, which is a single lane, or through the trading estate, which is already prone to congestion and is set to expand.

While this situation is still manageable, it must not be made worse.

Meadow Acre Road has hundreds of properties facing onto it. I understand that previously, local residents opposed access via Old Elm Road due to traffic concerns. However, Old Elm Road is a standard bi-directional road with pavements, a bus stop, and only one house facing it directly. In contrast, Meadow Acre Road is too narrow for bi-direction traffic, and is lined with homes—yet it is now proposed as the primary access route for new development.

If Old Elm Road was deemed unsuitable, then Meadow Acre Road, which is even less appropriate, should not be considered a viable access route. At the very least, its residents should have the same right to object.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Open Old Elm Road for permanent access. This would improve connectivity to Honiton, reduce reliance on the unsuitable Beech Walk and Hayne Lane routes, and ease congestion in the trading estate.

2. Create a new access route via the road past Combe Garden Centre toward Gittisham Forge. While this road is currently narrow, it differs from Meadow Acre Road in that no houses face onto it, meaning traffic flow would be more manageable. It could be improved by widening it or restricting parking to designated laybys. At the very least, it would provide an alternative access route instead of forcing all traffic through Meadow Acre Road.

While the existing single-lane section under the railway bridge toward Gittisham village would not be suitable for increased traffic, a new road could turn off before this point to connect with the proposed development.

This approach would create a fairer, more sustainable infrastructure plan for both new and existing residents, providing two main access routes and making the best out of a difficult situation, which I strongly believe is a fair compromise.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As resident stakeholder to this proposal, I would absolutely expect to see a case which can provide detail and assurance to show how concerns will be addressed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Rosie Walker

Full name: Rosie Walker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am concerned that Exmo_20 will destroy “tranquility, wildness, and dark skies” of the countryside, contrary to policy OL01. It will also destroy wildlife corridors, contrary to paragraph 13.23 of the Local Plan. This development would increase the need for car travel and likely increase traffic congestion due to the need of residents to travel a considerable distance (more than 800m) to key services and facilities in Exmouth or Budleigh Salterton. This is contrary to paragraph 11.6. The development is incompatible with sustainable transport (eg walking or cycling) as it is located too far, and on a route that is too steep. This is contrary to policy TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Tim Wallace

Full name: Tim Wallace

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access through Southern Wood. Consted narrow roads can not support additional through traffic. Parking is already an issue and unsafe.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Rob Wallbank

Full name: Rob Wallbank

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Figure 1

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: Figure 1 page16, shows a proposed plan for land use and therefore potential housing land for development. Notably, this delates all of Seaton and Colyford from East Devon National Landscape which is at odds with previous and historic land designation, including, but not solely, that designated as Green Wedges and previously designated “land of outstanding natural beauty,” agricultural land or green spaces, but renaming the land to circumvent disputes.

This plan is also not consistent with the local plan; “East Devon Local Plan 2020-2042 (Reg 19 Consultation) inset to Policies Map” as it removes much of Colyford, whereas figure 1 redefines the entire town of Seaton and the village of Colyford.

Full name: Rob Wallbank

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.2

3. Do you consider that this part of the vision chapter is sound?: No

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Chapter 2 sets out a vision. 2.2 is at odds with conservation and climate emergency! You are proposing building on the land which is the amenity, and I fail to see how the proposals have better access to surrounding countryside. They do that now, but by building new homes on green land, pushes existing housing further way from the ever diminishing countryside.

Full name: Rob Wallbank

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.6

3. Do you consider that this part of the vision chapter is sound?: No

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Para 2.6 is at odds with Set 02, Seat 03 and Sea 13a, whereby you're not respecting existing farming at these sites, reducing key and important rural activities and diminishing our ever decreasing agriculture in a part of the country that makes it so important. Air quality is so needed, and building over green spaces is not in keeping with green polices and carbon net zero claims.

Full name: Rob Wallbank

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.7

3. Do you consider that this part of the vision chapter is sound?: No

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Para 2.7/2.8 are quite simply, flowery words, and means nothing. New development cannot and never will draw on outstanding heritage legacy; it destroys it. It goes on to state you will “strive” to secure better facilities. How? Developers are interested in profit, but building facilities won’t happen because it hasn’t in the past. The seats 02, 03 and 13a are too small in terms of dictating such improvements to infrastructure, so the burden gets swallowed up in the existing over stretched ones, which will impact on existing residents and new ones alike but most of all, polluting the environment. The local area will not be greener! It will become more tarmac and concrete with greater flooding and reduced biodiversity. Building reduces the biodiversity, and in my experience only ruins it. Green spaces are lost for good; there will be no green tapestry!

Full name: Rob Wallbank

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.2

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: “Justification for Policy”, 3.2, works for where housing is close to work, but in the towns and villages noted in Para C, this is unjustified as there are already houses that are on the market and have been for a long time thus demonstrating there is no need for the current housing stock, let alone any new development. It is important to distinguish between main and local centres and placing emphasis on these as a result of their category. Demographic population and available work influence the significance of the towns and villages as well as their position within existing travel corridors and train/bus networks. Axminster is reasonably served as it has rail connections, but Seaton and Ottery for example have poorer connections, placing much more reliance upon car travel. Seaton therefore enjoys a pleasant and rural feel with locals who not only live there, but those that work there. It is not a commuter town, nor a satellite to other conurbations, and continued development of green land removes its appeal, damages the environment, removed local village and town identity, damages wildlife corridors and adds to the pollution due to stretched infrastructure. Under the Strategic Plan SP03, Seaton has a proposal for 522 new homes. This is a dangerous proposal for all the reasons set out above. There is not a need for this level of development because of the current housing stock and minimal work needs. For further information on these matters, see my comprehensive report dated 2nd June 2024.

Full name: Rob Wallbank

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.2

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: The strategic Policy SP01, para C, refers to “significant” development at the main centres of...Seaton...to serve their own needs and that of the wider surrounding areas. Elsewhere this is referred to as “local areas” which demonstrates that the enquiries made in producing this document, recognise that Seaton does not have housing needs for it’s own residents, but employment lies elsewhere. That elsewhere isn’t anywhere near, as the other villages and towns named are all local to Seaton. This implies very clearly that housing will exceed local needs, and therefore commuting will be needed. This needs to be addressed as such a policy is contrary to the Local and wider Plan objectives and places the whole document at risk of failing in its green credentials and net zero Carbon ideas, let alone damage to the green countryside and impact on the Jurassic Coast and historic green areas, Roman remains, vital to town and village identities.

Full name: Rob Wallbank

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: The strategic Policy SP01, para C, refers to “significant” development at the main centres of...Seaton...to serve their own needs and that of the wider surrounding areas.

Elsewhere this is referred to as “local areas” which demonstrates that the enquiries made in producing this document, recognise that Seaton does not have housing needs for it’s own residents, but employment lies elsewhere. That elsewhere isn’t anywhere near, as the other villages and towns named are all local to Seaton. This implies very clearly that housing will exceed local needs, and therefore commuting will be needed. This needs to be addressed as such a policy is contrary to the Local and wider Plan objectives and places the whole document at risk of failing in its green credentials and net zero Carbon ideas, let alone damage to the green countryside and impact on the Jurassic Coast and historic green areas, Roman remains, vital to town and village identities.

Full name: Rob Wallbank

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP07

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: The “Strategic Policy SP07 is an important section, and without this being a “cast in stone”, the damage to any area proposed in this proposal will cause irreparable damage to all areas. The infrastructure is at breaking point, and fails already under certain conditions, causing flooding and sewage discharge into the sea.

Full name: Rob Wallbank

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I've made some representations on this plan, but wish to add some pertinent points. These are comparing the existing site designation for land associated with Seaton 02 and 03 and refer to previous plans compiled by EDC

Then noting the current proposed plan regulation 19, the two proposals and statements are polarised. The first document states that great emphasis is placed on existing agriculture and farming in rural areas and the retention of green spaces and green wedges. Yet the regulation 19 has redesignated farming land and green wedges bring both into the proposed plan.

Security of land and land use as well as preservation of these special and rare spaces it crucial, in your own words, yet dismissed out of hand without discussion to anyone affected by these proposed changes and the considerable loss of amenity of these precious spaces.

Land designation is there to provide security to local populations knowing that it won't be built upon and wildlife, public view points etc are continued to be preserved for reasons set out historically and have remained so for many years.

I mention view points. The first document has two such points at the top of Barnards Hill Lane. One points east, which looks over the Axe valley to hills beyond, but view also looks south-east to the sea. This view point would look over Seat 02 and Seat 03 in the proposed plan, thus the statements to preserve these specific amenities, will be lost if

Seat 02 & 03 are built upon, robbing walkers and locals of a prime position above Seaton.

I urge EDC to seriously consider Seat 02 as not appropriate as it rejects all the previous land designation, rejects the positive needs of preserving view and vantage points, as well as rejecting the positive statements of preserving valuable farming land. I also draw on the other points I have made regarding loss of essential wildlife corridors, and increasing flooding to existing housing. This site should not be available for development.

Seat 03 is in conflict with much of the above so also should not be available to development.

I hope these observations are helpful in understanding my concerns and the proposed changes in land use that would permanently remove significant amenity benefits.

Full name: Rob Wallbank

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Seat

02 is proposed for 40 dwellings, with a wide buffer to the north and west. It is difficult to assess the density for his proposal as those properties in Mulberry Rise, Oakland close and Poplar Tree Drive (typo on the document corrected here), 40 houses would take up much of the site, and leave no wide buffer. The proposed size of this buffer is not specified in the document and therefore difficult to assess, but the available space and assuming similar density of building, would sensibly allow around 20 properties. The bat corridor is crucial and I predict a complete loss of this amenity if any houses are built on the site, let alone 20, but certainly not 40. This is an over optimistic number and will lead to over development of the site and a complete loss of the essential wildlife migration routes. By stating housing number in this policy, is dangerous, so since the corridor and buffer zones are vital, this allocated space must be set out clearly to avoid misunderstanding (at best), or high levels of abjections later when it becomes clear that the housing number takes priority over an interpretation of “buffer zones”. Access to Seat 02 is awkward unless the spur off Lime way is used. Otherwise Barnards Hill Lane will be a busy junction at the bottom and encourage more cars to use the lane to exit onto the A3052, much as they do now which is extremely dangerous and illegal. Such a proposal represents a significant loss to the area. Barnards Hill Lane is used by many local walkers as it provides a safe access to Holyford as well as a rare view over the to the Axe estuary and sea. If building work is granted, then it would need to be at maximum only the bottom half of the site only, to provide adequate bat migration, but also a sensible and appropriate gap between Seaton and the country side. The impact on the current flooding of this site would then be reduced allowing surface water to be diverted to Poplar Tree Drive and not towards Lime Way as it currently does. Single storey housing would be in keeping with the surrounding area and be more of desirable need to locals. It would reduce the visual impact of the development in its location. Developing this site (Seat 02), should be last resort bearing in mind the environmental impact in my view, and the suggestion of stating a buUer and reducing the available

building land to the southern half of the field, is a compromise providing environment issues can be overcome. Seat 03 is also affected by the bat corridor and I suspect both Seat 02 and 03 to come under very strong opposition from ecology reports. I object to any development on Seat 02, but if some have to be built, then this must be limited to the lower half of the field only to preserve wildlife corridors, essential agriculture, a demarcation between Seaton and the countryside, preserve a valuable viewpoint for many folk who walk up Barnards Hill Lane, and mitigate flooding into the properties below this site. It would be preferable to look elsewhere for building on existing brownfield sites first before losing this amenity for good. Seat 13a is a very sensitive site, and the Proposal states “Archaeological assessment through geophysical survey and field evaluation should be undertaken prior to the site being developed”. It should read “Archaeological assessment through geophysical survey and field evaluation should be undertaken to assess if a development is safe and practical without causing damage to Roman remains, prior to any progress with considering this site”. This is an area which has much historical amenity value, and would be lost if built over too near to it. I object strongly to the site being considered when other brownfield sites exist.

Full name: Rob Wallbank

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The purpose of this note concentrates on the local planning suggestions for Seaton and Colyford area, where the land identified as Seat 02, Seat 03 and Seat 13a have ignored the historic land designation set aside to differentiate Seaton from Colyford removing previous Green wedge designation, and serious impact to wildlife. I therefore object to the developments specifically Seat 02 and 13a but also Seat 03 for the obvious linking of Seaton to Colyford. The Regulation 19 plan sets out to provide statistics regarding the East Devon area, encompassing the entire district, but does not allocate statistics to individual areas; Seaton's demographic age group is much higher than the 30% quoted, and average earnings are therefore much less than the national average. Housing are mainly bungalows which represent a higher proportion of the housing type, mainly because of the age of the population, and as a consequence, employment in Seaton is much lower than the average, and thus distorts the overall statistics than needs to be considered in additional housing; Jobs attract people. No jobs means housing is not needed, or it simply promotes more commuter traffic to those parts where employment exists, clogging up roads increasing pollution. The statistics have placed value upon Historic Environments and Outstanding Natural Environments, which I welcome. Seaton is on the Jurassic Coast with very long links to the Roman times. There are many protected species, such as bats and bird migration to the Wetlands area, which makes the local plan for Seaton and that of Regulation 19 not only curious, but contrary to the proposed plans and ideals set out in the introduction. The proposal is to adopt this document and then local planning and developers to test conformity, but since this plan removes much of the objectives it sets out to preserve, and ignores key factors in planning (wildlife lost, currently used agricultural land, historic green spaces that separate housing areas, land known to excessive flooding, loss of agricultural land to name but some of the objections), then by allowing development to be adopted simply isn't good practice, and in fact is dangerous to local communities, wildlife, road and sewage treatment infrastructure, schooling, doctors, hospitals etc etc. Developers

should not be the people to test the policy and constraints of the land, it must be done at this strategic planning stage. I know that no one has undertaken flood risk assessments of Seat 02 and Seat 03; there have been no consultations with bat conservation, there have been no design checks on existing foul sewage disposal; the list could go on, but to set aside land is a failure to understand the land use and the local needs and constraints. There is already a sewage treatment plant in Seaton that cannot cope with the needs discharging waste into the sea, thus allowing a policy at this planning stage to building more homes will directly impact the coastal environment and is therefore negligent in this proposals. Blame will be pointed at South West Water, but in fact adopting a plan to allow building will be the cause, and this is East Devon's responsibility. At present there are a great number of vacant properties in Seaton. There are few local jobs and therefore to build will damage the environment, place excessive burdens on infrastructure. There are many properties that have been bought up as second homes, which damages the community, and the area, as it does not set out to achieve any of the perceived housing needs for locals.

MRS PAMELA WALLINDER

Full name: MRS PAMELA WALLINDER

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should and could be built at an alternative location where there is no disruption to wildlife corridors and light pollution (paragraph 13.23 of the Local Plan). It would increase car usage as there is no nearby public transport. The B3179 road is not suitable for walking (no pavement) or cycling (too narrow) or for large vehicles. The development would put pressure on the Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the local plan. Local Services are already under pressure due to recent house building and people are moving into the area.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Laura Ward

Full name: Laura Ward

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I am writing to formally object to the proposed development on the Ash Piggery site, Langaton Lane, Pinhoe, Exeter. Whilst I acknowledge the Council has a responsibility to allocate land for gypsy and travellers, I believe that this particular site is unsuitable due to several critical concerns that need to be addressed. These concerns cover significant issues relating to healthcare, education, infrastructure, emergency access, environmental protection, and the broader impact on the community.

1. Demand on Local Healthcare Services The development will place an additional burden on already overstretched local healthcare services, particularly Pinhoe Surgery and Pinhoe Pharmacy. I have been a resident in Tithebarn for over six years and during this time I have experienced a significant increase on waiting times for appointments. It has been highlighted during a meeting over the last few weeks that Pinhoe Surgery are already over capacity and therefore in the very near future they will be unable to register new patients. Introducing more residents to the area will only exacerbate this strain, leading to potential negative impacts on the health and well-being of local families.

2. Strain on Local Education Facilities Local schools in the area are already operating at or beyond full capacity and I am aware, from speaking to local residents, that children living near the proposed site, particularly in the Tithebarn development, are currently unable to access local schools, such as the Cornerstone Academy Trust School in Monkerton and alternatively are being placed at Primary Schools further away, such as Clyst St Mary or St Nicholas Primary School. This is therefore increasing volume of traffic due to children having to commute to school by car. The development would further exacerbate this problem, leading to an increased need for school places that the current infrastructure is simply unable to accommodate.

3. Flooding Risks The majority of the site is located in Flood Zone 3, which indicates a high risk of flooding. The potential for flooding in this area could not only pose significant risks to the new development, but also to the surrounding community,

particularly given the site's proximity to sensitive areas. Developing in such a high-risk flood zone raises serious environmental and safety concerns, especially in light of increasing concerns about climate change and unpredictable weather patterns.

4. Noise Pollution The site is situated near two significant sources of noise pollution, which is the M5 motorway and the Exeter to Waterloo railway line. Caravans/mobile homes will not have the appropriate sound proofing measures to eradicate this noise, like permanent housing have. The 2019 EDDC Planning Officer's report for an adjacent development (19/1950/MFUL) deemed this area unsuitable for standard residential development due to high noise levels and therefore Ash Piggery Site would also be unsuitable.

5. Poor Vehicular Access and Impact on Pedestrian Routes Langaton Lane is a narrow, no-through road and a key pedestrian route, which would make vehicle access to the proposed site extremely difficult. The proposed development will likely increase traffic volumes in an area that is not designed to accommodate such levels of vehicle movement, further compounding congestion and posing safety risks to pedestrians, cyclists, and local residents. This will also have an adverse impact on the character of the area, which currently benefits from its peaceful and green nature.

6. Emergency access Further to the points highlighted in section 5 regarding poor Vehicular Access. Limited access and flooding issues affecting the lane could delay or prevent emergency vehicles gaining access to the site. This will therefore go against the fundamental requirement of ensuring a safe and reliable emergency service access to any residential development.

7. Environmental Impact on Protected Species and Green Lane Status Langaton Lane is a designated green lane, an important environmental feature that supports local wildlife, including protected species. Any development in this area could disrupt the local ecosystem, posing a threat to wildlife habitats and biodiversity. The need to preserve and protect these environmentally sensitive areas is crucial, and the proposed development may undermine the long-term sustainability of the country park.

8. High Development Costs and Public Expenditure The site itself is valued at £600,000, and it is estimated that further development, including converting the existing bungalow into a facilities block could potentially exceed one million pounds in total. Given the significant costs involved, I question whether this is a responsible use of taxpayers' money, particularly when the benefits of the development appear limited and the negative impacts on the community and the environment are so considerable. It has come to my attention that the Traveller site at Broadclyst have four vacant pitches. It would be much more cost effective to utilise these existing pitches, than spend further money on a site that has no guarantee of being fully occupied. Conclusion In light of the above concerns, I strongly urge the planning department to reconsider the proposal for

development on this site. The challenges posed by the potential strain on healthcare, education, environmental protection, and infrastructure, combined with the high development costs and flood risks, make this site unsuitable for development. I believe that a more appropriate and sustainable location should be sought to meet the area's housing needs without compromising the quality of life for existing and future residents.

Andrew Ward

Full name: Andrew Ward

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: RE:

OBJECTION TO ASH PIGGERY TRAVLLER SITE ALLOCATION IN LOCAL PLAN SITE

ALLOCATION I am writing to formally object to the proposed use allocation for a gypsy traveller site at Ash Piggery, Langaton Lane in Pinhoe stated in the Draft Local Plan.

While I appreciate the need for additional accommodation for the Traveller community, I believe that this proposal site raises several significant concerns that would have a detrimental impact on the local infrastructure and area. Below are some of the planning policy related objections that I wish to raise:

1. Chapter 5: Gypsy and Traveller provision allocation of a Gypsy and Traveller site at Langaton Lane within the Local Plan. While it is imperative that appropriate accommodation is provided for the Gypsy and Traveller community, the selection of this site presents significant concerns regarding its stability. This response evaluates the proposal against National Planning Policy, Equalities Legislation and Best Practice for Gypsy and Traveller site allocations. The number points 10D, 13G relate to the Government's policy paper 'Planning Policy for Traveller Sites'.

2. Planning Policy and Legal Framework The proposed allocation must be assessed in accordance with: The National Planning Policy Framework (NPPF) The Planning Policy for Traveller Sites (PPTS) (Updated December 2024) The Equality Act 2010 The Human Rights Act 1998 The East Devon Local Plan 2020-2042 The Broadclyst Neighbourhood Plan

3. The Planning Policy for Traveller Sites requires Local Planning Authorities to ensure that sites are sustainable, with access to education, healthcare, and other essential services. It also mandates that sites should not be located in areas subject to high levels of environmental harm, including excessive noise and pollution (PPTS, 2024, Policy B).

4. Noise Pollution. The Langaton Lane site is in close proximity to both the M5 motorway and the Exeter to London Waterloo railway line, exposing it to severe noise pollution.

The 2019 EDDC Planning Officer's report for an adjacent development (19/1950/MFUL) deemed this area unsuitable for standard residential development due to high noise levels. While mitigation measures such as triple glazing were proposed for permanent housing, these are not feasible for caravans or mobile homes, rendering the site unsuitable for Gypsy and Traveller accommodation. This aligns with material planning considerations for The Old Piggery, Point 13E, which highlights the severe noise impact of the location.

5. Accessibility and Infrastructure. Langaton Lane is a narrow, rural road with no through access and lacks adequate infrastructure to support further development. While the site is near major transport links, direct accessibility remains problematic. This contradicts the requirement under the PPTS (Policy B 2024) for sites to be in sustainable locations with safe access to essential services. Cont'd

6. Furthermore, Langaton Lane is a key pedestrian route and a no-through road, raising concerns about highway safety and accessibility, Point 13H. The sole access to the site is via a single-track lane that is prone to regular flooding, further exacerbating concerns about site viability. The road also includes a sharp turn, which may present difficulties for long vehicles, including those typically used by the Gypsy and Traveller community. These factors significantly undermine the practicality and safety of the proposed allocation.

7. Emergency Access. The site is located just south of the point where Langaton Lane is 'stopped up,' making it a no-through road. This raises additional concerns about emergency service access. The restricted access route, combined with the narrow lane and its flooding issues, could delay or prevent emergency vehicles from reaching the site in a timely manner. Ensuring safe and reliable emergency access is a fundamental requirement for any residential development, and this location fails to meet that standard.

8. Flood Risk. A significant portion of the site is on land susceptible to flooding. The National Planning Policy Framework (2023) states that new development should be directed away from flood prone areas unless there are overriding sustainability benefits, which do not appear to exist in this case. The Old Piggery site assessment confirms that the site is located within Flood Zone 3, which may worsen with climate change, making it highly unsuitable for residential development. Points 10D and 13G.

9. Strain on Local Services. The proposed site lacks sufficient access to essential public services, including school places and healthcare provision. The Old Piggery site assessment notes that the availability of infrastructure and public services is a key material planning consideration under the NPPF and PPTS. Point 4J. The existing pressure on healthcare services, including doctors, dentists, and pharmacies, would be exacerbated by additional residential development on this site. 10. Environmental and

Heritage Concerns. The site is located near the Minerva Country Park, an area designated for biodiversity and green infrastructure. The site assessment, Points 4K, 10E, 13D, highlights the potential environmental damage, loss of green space, and threats to local wildlife. The PPTS (Policy B, 2024) requires that Gypsy and Traveller sites be located in areas that do not harm biodiversity or the environment, making this allocation problematic.

11. Equality and Legal Considerations Under the Equality Act 2010. Gypsies and Travellers are recognised as a protected ethnic group. Allocating a site that is unsuitable for residential use due to environmental factors could be seen as discriminatory if alternative more suitable sites exist. The Human Rights Act 1998 further protects rights to private and family life, which includes the right to a safe and habitable living environment.

12. The Planning Policy for Traveller Sites (PPTS 2024) emphasises that Local Authorities must ensure fairness in site selection, ensuring that Gypsy and Traveller communities are not subjected to substandard living conditions compared to the settled population. The Old Piggery site assessment further supports this by noting that government policy states that Traveller site development should be strictly limited in open countryside, reinforcing the unsuitability of this allocation.

13. Inconsistent with National Planning Policy for Traveller Sites (PPTS). The proposal does not align with the National Planning Policy for Traveller Sites (PPTS), which guides Local Authorities in managing the development of Traveller sites. The PPTS outlines how Traveller sites should be considered in terms of sustainability, access to services, and avoiding harm to the local community. The proposed site fails to meet the sustainability criteria outlined in the PPTS, particularly in relation to the site's proximity to essential services, public transport, and employment opportunities.

14. Impact on Residential Amenity. The development might affect the quality of life for local residents, particularly in terms of noise, privacy, and aesthetic value. Policies that ensure developments do not harm the amenity of neighbouring residential areas (e.g., Local Plan policies on residential amenity or character of the area). The proposed site is located too close to existing residential properties, which will suffer from increased noise, potential for anti-social behaviour and a loss of privacy.

15. The proposed site is isolated and does not have adequate access to public transport, healthcare, or schools, which are required by the National Planning Policy for Traveller Sites (PPTS) to ensure the health and wellbeing of the community.

Cont'd 16. Road Safety and Traffic Concerns. Increased traffic from the Traveller site could pose safety risks for local roads, particularly if the site is located near vulnerable areas. Local traffic and highway safety policies require that developments do not result in harm to road safety. The access roads to the proposed Traveller site is narrow and unsuitable for additional traffic, posing a danger to pedestrians and local residents, particularly children attending nearby schools. It also does not appear that the necessary vehicle splay without excessive removal of the existing hedgerow which is contrary to planning requirements.

17. Impact on Local Infrastructure. The proposed site is in an area that already faces pressure on local infrastructure, including road networks, healthcare, and educational facilities. The

addition of a Traveller site could place further strain on these services, which are already at capacity. Specifically, the narrow roads in the area, including Langaton and Orchard Close used as a cut through, which are not suitable for increased traffic, especially if the site is to be expanded or if it becomes permanent. The local medical and educational facilities may also struggle to accommodate additional residents, which could affect the overall quality of service for all residents in the area. I understand the Pinhoe GP Surgery is facing closing their patient list in the near future. 18. Impact on Local Infrastructure. The local school pupils in the Tithebarn area are not currently able to obtain a place at the local schools and are travelling out of catchment to attend school. An increase in school age children will worsen the current situation. 19. Environmental Concerns. Development of this land could lead to the loss of local biodiversity, disrupt wildlife habitats, and negatively affect the surrounding countryside. I am concerned that the development would not be compatible with the area's current environmental status and that adequate measures have not been outlined to mitigate the potential harm to the local environment. 20. Noise and Aesthetic Impact. The establishment of a Traveller site in this location could result in increased noise pollution and visual intrusion for surrounding residents. The peaceful nature of the area, which is an important aspect of the local community, would be significantly affected. Concerns about noise from the site, especially from vehicle movements, families, and any business activities, are a real worry for the wellbeing of local residents. 21. Lack of Adequate Consultation. It is my belief that the local community has not been sufficiently consulted regarding the potential impact of this proposal. The development of such a site should involve thorough discussions with local residents to ensure that their views and concerns are fully considered before any decisions are made. 22. The relevant concerns and objections which were largely included in the Draft East Devon Local Plan Consultation Feedback Report dated July 2023 in addition to other items which I feel are relevant. East Devon Council have already stated in their report that there is limited support for a site in this location are outlined below: ? Policy 18 - Gypsy and Traveller Site East of the M5 and South of the Exeter Waterloo Line. ? Most respondents accepted that there is a need for Gypsy and Traveller provision although support for a site in this location was very limited. ? Concern over the proximity to local community groups, such as scout hut, and their enjoyment of the existing facilities. ? The site is close to existing housing and would have a detrimental impact to the area. ? Langaton Lane is a green lane which has been closed for safety reasons due to the narrow access and concerns with vehicle and pedestrian traffic. ? The safety risk has been accepted as a risk by closure of the through road so I cannot understand how consideration is being given to increased traffic movements. 23. Pinhoe Village residents have submitted a proposal for an alternative 'safe, traffic-free active travel route connecting the communities of Pinhoe, Monkerton and Tithebarn to Pin Brook and Clyst Valley Parks, using paths identified by our communities as historical access points, safeguarding the biodiversity of the wildlife linescape along Pin Brook flood

meadows and Pinhoe's Community Field, protecting the character and historical significance of this marshland area.' The submission includes maps of the proposal. 24. The site is isolated and not integrated alongside bricks and mortar housing, contrary to policy 8. Cont'd 25. The site is in an area of high flood risk, flood zone 3, and will increase flood risk on surrounding areas due to introduction of hardstanding. 26. Development will adversely impact by additional new hard surfaces, road infrastructure, etc. reducing existing green soakaway capacity of this green field site. 27. Concerns regarding security, visual impact, waste, litter, parking, etc. 28. Access to the site is poor for larger vehicles, given the low bridges and the site boundary hedges will be destroyed to create access and visibility. 29. No technical highways assessment is evidenced to support the draft allocation. The sustainability appraisal for the site is out of date, invalid and connectivity distances are now far greater. 30. Allocation is premature as needs assessment is still underway. No alternative sites have been considered. 31. Otter Valley Association have objected to this allocation due to proximity to the M5 and noise exceeding WHO limits. 32. National Highways suggest identified noise impacts from the M5 which should be considered to ensure noise issues are not experienced by future residents. 33. Bricks and mortar housing is unacceptable in this countryside location, Traveller housing should be treated the same way. 34. The Ash Piggery site is currently on the market for sale at £600,000 for a circa 4 acres of agricultural use land. This presents a cost per acre in the region of £150,000. Typically, agricultural land would have a value of £10,000 per acre. It is considered that this site is vastly overpriced and would be a disgraceful use of taxpayer funds when the acquisition and construction costs to convert the existing buildings and infrastructure would likely approach £1m. 35. The East Devon District Council Strategic Planning Committee meeting report on the 5th September 2023 confirmed that there is potential for four additional pitches on an existing site at Elbury Close in Broadclyst. The costs associated with bringing the four additional pitches on an existing site would be a much better use of taxpayer funds due to the lower costs associated with the development over acquisition and construction costs for an alternative site. 36. In conclusion, while I understand the need for providing accommodation for the Traveller community, I do not believe that this location is suitable for such a development due to the negative impacts it would have on local infrastructure, the environment, safety, and the quality of life for surrounding residents. Therefore, I urge East Devon District Council to reconsider the proposal and explore alternative locations that can better meet the needs of the Traveller community without causing undue harm to the local area.

Derek Ward

Full name: Derek Ward

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

<https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>

With regards to the proposal for a site for Travellers I am sure that you have studied the Government advice as shown above.

Having made a quick observation of this it seems to me that there are many areas that the Old Piggery Site is unsuitable.

4j.. lack of school places and too much pressure on doctors, dentists , healthcare services including pharmacies. 4k.. protection of Country Park, and the high quality housing and High Tech Science Park. 10d.. proximity to Flood Zone 3 which in all likelihood will get worse with Climate Change . 10e.. Protection of Wildlife in Country Park, Safety and security of Scouts. Consideration of welfare and Security for the many residents who have invested hundreds of thousands of pounds in East Devon for a high quality life in a developing high tech area. 13a.. Questionable if a peaceful co-existence can be maintained. 13b.. Lack of health services as in 4j. 13c.. Lack schools as in 4j. 13d.. risk of environmental damage. 13e.. Noise levels with proximity of M5 and SW Rail. 13g.. Site is on Flood Zone 3. 13h.. Langaton Lane is a No Through Road and is a walking route to schools, station, doctors, shops for the hundreds of residents of Minerva Estate.

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

It makes no sense to create this as a suitable site for travellers. The site would be ideal to create a a Wetland and develop as such for nature and wildlife ?

The above is just a selection of observations and there are no doubt many more.

Sarah Ward

Full name: Sarah Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Development of Exmo_20 on heavy clay subsoil with poor soakaway would result in an increase flood risk, where there is already one, in the downstream flood risk along Withycombe Brooke through Exmouth, already this is under additional stress due to climate changes. In addition, this is in conflict with Policy AR01B. Exmo_20 development would cause fragmentation and isolation of habitats while destroying the wildlife corridor, in contradiction to Paragraph 13.23 of the local plan. It will cause irreplaceable habitats to animals and veteran trees across the site, contrary to Paragraph 13.9 of the plans.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Building so far from the City, motorways and central train lines only causes more commuting and higher levels of stress to other roads and local villages. The local secondary school is already very full and as such children in the local area will need to relocate when having children and making informed decisions on their children's futures. What is Exmouth creating for the younger generation to stay? When is the future planning to ensure that the money of the families living in the new housing will enhance the local area? Doctors, Dentists, Colleges/uni courses need to be readily available, the future of the town and local area require families to stay and want to grow, while supporting small businesses and people - this will not happen when locals cannot park or access the required amenities to not just survive, but thrive. > Do not access the site via Southern Wood,

this is detrimental to the locals who reside in this area. There is plenty safe space to access the sight from Salterton Road or the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: So that local home owners who can see and understand the land can help to enhance the planning. On paper it might look sensible but locals can explain how the land reacts throughout seasons and time. Change is good, when considered in it's full entity, but the appropriate persons in addition to the specialists.

Brian Ward

Full name: Brian Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: EXMO_20

The Pebblebed Heaths, which are of international nature conservation importance, lie close by and to the north of the site.

By virtue of the proposed development being within 400 metres of the East Devon Pebblebed Heaths, it is likely to lead to the deterioration of habitats and loss or disturbance of wildlife within the East Devon Pebblebed Heaths Site of Special Scientific Interest, East Devon Pebblebed Heaths Special Area of Conservation and East Devon Heaths Special Protection Area arising from the residential occupancy of the building and increased recreational use. These effects cannot be avoided or mitigated other than by avoiding residential development. As such the proposed development is contrary to Strategy 47 (Nature Conservation and Geology) of the Local Plan 2013-2031 and the Conservation of Habitats and Species Regulations 2010.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification

will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce size of EXMO_20 or remove it from the Local Plan. Do not access this reduced site from the B3179.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
EXMO_20

The Pebblebed Heaths, which are of international nature conservation importance, lie close by and to the north of the site.

I had assumed that sites within 400m of the Pebblebed Heaths SAC, i.e the northern section of EXMO_20, would be ruled out as being unsuitable in the HELAA, i.e in the East Devon Local Plan 2020-2040 – Site Selection Methodology (May 2022).

Therefore, by virtue of the proposed development being within 400 metres of the East Devon Pebblebed Heaths, it is likely to lead to the deterioration of habitats and loss or disturbance of wildlife within the East Devon Pebblebed Heaths Site of Special Scientific Interest, East Devon Pebblebed Heaths Special Area of Conservation and East Devon Heaths Special Protection Area arising from the residential occupancy of the building and increased recreational use. These effects cannot be avoided or mitigated other than by avoiding residential development. As such the proposed development is contrary to Strategy 47 (Nature Conservation and Geology) of the Local Plan 2013-2031 and the Conservation of Habitats and Species Regulations 2010.

Please see planning application 18/2445/FUL | Conversion of existing barn with extension, plus associated works for holiday use only, Ellergarth, Dalditch Lane, Budleigh Salterton, EX9 7AH, and associated Appeal documents. The Application was refused through the policy of not allowing new dwellings within a 400m protected zone of the Pebblebed Heaths. The Inspector appointed by the Secretary of State noted that this restriction was specifically on account of the impacts of domestic cats through bird predation. Consistency of Policy is required.

The proposal will lead to unmitigated harm to the protected sites. The National Planning Policy Framework, at paragraph 175 indicates that if significant harm to biodiversity resulting from a development cannot be avoided or adequately mitigated, then planning permission should be refused.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce size of EXMO_20 or remove it from the Local Plan. Do not access this reduced site from the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that local views are considered.

Nicola Ward

Full name: Nicola Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmouth is a town with insufficient sewerage infrastructure, demonstrably broken sewage network and demonstrably under capacity of the sewage treatment facility so without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Remove Site Exmo_20 from the Local Plan. The policy does not take into account the already acknowledge failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth and Budleigh from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

Full name: Nicola Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

Full name: Nicola Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
INCREASED FLOOD RISK

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

Full name: Nicola Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

Exmo_20 would mean that hundreds of households would be using the already struggling water and sewerage infrastructure. SWW cannot cope with the management of current levels of sewerage in Exmouth and Budleigh Salterton and this extra demand could be catastrophic for the area in terms of the unregulated discharge of untreated sewerage into our rivers, seas and onto land. I cannot find anywhere in this over complicated process to state these infrastructure concerns. SWW are failing badly with the current population size, they will not cope with this size of development.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. It is unsustainable development. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

? Exmo_20 would undoubtedly destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the

Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We have serious concerns that the infrastructure we have in this part of rural Devon eg with regard to roads and and sewerage system capacity are already under pressure and causing real problems in the area. I would want to see the removal of Exmo_20 from the Local Plan, or at the least significantly reduce the size of Exmo_20.

Neal Ward

Full name: Neal Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This site sits on a green wedge that is within the current adopted local plan. I was not pointed out at consultation stage that proposed site Whimble 08 was on the agreed Green Wedge. This Green Wedge was put in place to prevent coalescence between Whimble and Cranbrook. Allowing development on Green Wedges contravenes the current adopted plan and NPPF section 13. The area of this Green Wedge has also been altered without any consultation.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Whimble 08 should not and should never have been considered due to it being on a Green Wedge. It should have been refused at the first site investigation part of the consultation, however at that point the officers dealing with this seemed unaware of the Green Wedge. It goes against the the current adopted local plan and the legislation protecting same. It also contravenes the NPPF.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site on agreed Green Wedge and other parts of the Green Wedge have been altered without any consultation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Whimble 08 as a site for future Development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The council have totally ignored the large amount of public concern re developing on the Green Wedge. They have also ignored the current adopted plan and its contents re developing on Green Wedges. A/ Development on a green wedge would start the coalescence of Whimble to Cranbrook and once the precedence is set there is nothing stopping the rest of the green wedge being developed on. Contravenes Strategy 7/8 re coalescence in current local plan 2013 to 2031. Policy 78 Green Wedges, page 243 proposed local plan. B/ Removal of the historic orchard and destruction of natural habitat contravenes Strategy 47 and policies D1, D2, D3,ENG of the current local plan 2013 to 2031. It also contravenes the proposed local plan policies 84,85 & 86.

Based on the above supportive and significant evidence I request that site Whim_08 is removed from the proposed local plan and in no way included in the adopted plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Helen

Full name: Helen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: “Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. This includes the availability of medical facilities, school places and road links, which are currently at full capacity. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage. including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove or considerably reduce

SD01 development until adequate sewage treatment and storm capacity expansion is in place.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmouth currently has an insufficient sewerage infrastructure, a demonstrably broken sewage network and under capacity of the sewage treatment facility . Without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01 Due to its location , Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is an unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. The B3179 is already very busy and the winding nature of the road with several turn offs already make it dangerous , particularly at night when bright LED headlamps can blind on-coming traffic. As a sole point of access the B3179 cannot support the extra volume of traffic that a development of 700 houses would inevitably create.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site EXMO 20 from the local plan . There are far too many houses allocated on this site for the local infrastructure in place. The site is too near the protected Pebble Bed Heaths and will have a major impact on wildlife and biodiversity . The B3179 will not cope with any more traffic .

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The projected allocation of 2311 new homes in Exmouth

compared to a much lower allocation of 471 for Sidmouth and 839 homes for Honiton , which are similar sized towns seems out of proportion. I question the need for 4777 new homes in East Devon by 2042, which is an arbitrary target given by central Government without any justification. This figure totally outstrips the need for affordable housing for local young people on the start of the housing ladder. Past developments in East Devon, such as Cranbrook have proved that the majority of new housing is bought up by people from outside the area and is too expensive for people who are born and grew up in East Devon. Without accompanying investment in infrastructures such as roads , sewerage, schooling , medical provision , retail and opportunities for leisure within the areas being built on , an employment opportunities , extra housing just places an extra strain on all the existing resources. The National Policy Planning Framework outlines that : 20. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for: (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

(c) community facilities (such as health, education and cultural infrastructure); and

(d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation. This planning proposal for Exmouth has clearly not considered these issues before allocating areas for development and also plan on using Grade 1 agricultural land instead of brownfield sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This consultation document is unnecessarily difficult to answer and requires a computer which dis-enfranchises many in the community. It does not comply with the 2018 accessibility regulations for the public sector. The complex wording and demands for "precise" modifications and legal compliance assessments are completely unrealistic for the average resident, who will not have a background in planning law. The consultation form is designed to dissuade participation rather than engage the community, which is undemocratic.

Ian Wasson

Full name: Ian Wasson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo20 is on the busy B road linking Budleigh Salterton and Woodbury Common and would increase traffic here way out of the level designed for such a road. The site is also nearer Budleigh Salterton than Exmouth and as such residents are more likely to use overstretched facilities in Budleigh such as the doctors surgery and schools. The site is also huge and projects in an unrealistic way out of Exmouth. I fail to see why this expansion is required when there are also proposals for a second new own in East Devon and the expansion of Cranbrook has not yet been completed. The plans will ruin the appeal of this area of East Devon to visitors, and will just increase the level of traffic to Exeter, the main employment hub in the area.

The site would increase the need for car travel generally in conflict with paragraph 11.2 as it would not be possible to walk to local facilities either in Exmouth or Budleigh Salterton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo20 from the developing local plan, or reduce its size away from the Budleigh to Woodbury Common road, or remove access from the B3179 altogether. Or, revert to site Exmo 20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ian Wasson

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE07

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: With small towns like Budleigh Salterton, frankly there are now too many shops for the size of the town, which lies very near to Exmouth with a much larger shopping centre. This means that shops remain empty, look dreadful and reduce the overall attractive appearance of the town. Landlords should be encouraged to maintain their shop fronts, and more importantly it should be easier to convert commercial premises to housing to help meet housing needs that having to build on open countryside.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Karen Waters

Full name: Karen Waters

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

In relation to Feniton, I don't know whether the draft local plan has been developed in a legally compliant way. I don't have legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.
- Our public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of us who live in Feniton.
- EDDC's preferred method of commenting is the Common Place System. I am computer literate, I run my own accountancy practice and use softwares on a daily basis, I simply couldn't understand this online form, It is complex and extremely time consuming, effectively deters anyone from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values. I honestly believe its been made like that to discourage people from commenting. Incredibly disappointing.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Reference and copied image at beginning of response form showing Regulation 19 Proposals Inset Map for Feniton, entitled 'Map of Proposed Sites For Feniton', stating, "There are two sites of importance for Feniton- Feni_08 and Otry_20. Planning has already been granted for Feni_05, The Burlands. Feni_08 is housing and in green. Otry_20 is in red."

Flooding: Our village floods regularly after heavy rainfall, we often cannot get in or out of the village in any normal car, I feel relieved I am not on the main estate where they need sandbags and their homes flood. Its well documents how we flood and how frequently. There are tampons, condoms and raw sewerage in the water ways behind the houses near the new Kier site, its gross but EDDC just ignores this We all know more development equals more flooding. And every developer promises flood risk alleviation schemes but they simply don't materialise. The current Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30. If more houses are built this will simply render this work that we have fought for so many years to not have the effect we need. In times of heavy rain, Pattersons Cross already becomes impassable, and this is before the diversion the the FAS will add to this. We don't even know if it will work yet! Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage: It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding. Our roads and home often flood with raw sewage.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability: At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development. Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.

Lack of adequate public transport. The trains are unreliable, infrequent and certainly don't negate the need for a car. All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic. I am a dog walker, I take my life in my hands on the roads, its got worse over the years, there are not enough passing points and many many bottlenecks. When the the Ottery Road/Green Lane junction was closed for

the FAS works. At times delays getting in and out of the village were extensive. There were literal standstills with the volume of traffic people stuck for over 30 mins, I missed a doctors appt and my sone had to drive a different rounte addings 10 mins to the journey just to get out of our village.

When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic. I feel grateful my children attended this school between 2004 and 2013 before I was at capacity only 1 or 2 chldren struggled to get a spot then, now we have children being bussed all over the place as there is no space, local kids within walking distance not able to attend the local school, this is ludicrous. Feniton Primary School is at capacity and in great need of a building upgrade My friend works at the school and often talks of the building issues.

Doctors! I cant get an appointment! There are no other words, where on earth will all these people see a doctor?

There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable.

The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy. The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.

- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not ‘limited’ but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. Have you actually seen this road????? It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.

- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.

- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.

- The size of Otry_20 does not align with EDDC’s Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Bryony Watkins

Full name: Bryony Watkins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Katie Watson

Full name: Katie Watson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

David Watson

Full name: David Watson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Richard Watson

Full name: Richard Watson

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: Surprise that EDDC is accepting Plymouth University's revised assessment that Sidmouth East Beach cliff erosion has accelerated from less than 1m per year to 2.5m per year, in a very short time, without getting a second opinion. Is this failure of "Duty of Care" ? This part of the plan is NOT sound. This revised assessment by Plymouth University and acceptance by EDDC will affect Sidmouth Town Centre, Sidmouth Swimming pool, Pennington Point, The Ham, SWW, and Cliff Road. This could be an oversight at the draft stage of the Local Plan. The Plan could be easily amended, or if left unaltered a case questioning "Duty of Care" resulting in a Judicial Review, could be forthcoming. If the revised erosion rate is correct the value of all properties in the affected area will have a greatly reduced freehold value and may be unsellable. This in turn could affect the Rateable Values and so greatly reduce the Council Tax revenue, Business Rates income and Sidmouth as a holiday town. Once the East Beach Protection Scheme is built, Sidmouth Town Centre, Sidmouth Swimming pool, Pennington Point, The Ham, SWW, and Cliff Road will all be safe again and the proposed building embargo should be lifted. The only foreseeable problem to protect Sidmouth is English Heritage assisted by Plymouth University revised erosion rate.

Melissa Watts

Full name: Melissa Watts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Stephen Watts

Full name: Stephen Watts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There is no clear evidence of widening of the A376. Exmouth is a peninsula with one narrow road in and out and a further 2000 properties will mean another 2000 cars. There is a problem already with traffic and continued temporary traffic lights causing severe delays and slowing down business. Houses are needed but dramatically increasing housing in Exmouth without improving the road in and out of Exmouth is just increasing impact on residence and business.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: An additional lane or an alternative road to the A376.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See above

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There is no detail on infrastructure. Yes people will cycle as I do. But in winter and poor weather the cycle path is deserted and the roads are clogged.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sean Webber

Full name: Sean Webber

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I do not believe that the areas HON_07, HON_12, or HON_13 are suitable for development. They are within the National Landscape and are very close to historic buildings - they would surround St Michael church. The fields are also an important green space for people living nearby and developing the land would result in the town spreading further into the adjacent countryside, reducing the access to greenspace for existing residents. The addition of some many extra houses would also result in increased traffic and noise.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe these areas should be removed from the plan, or the scale of the development should be significantly reduced. The area HON_07 seems the most suitable of the three areas but I believe development of HON_13, and particularly HON_12 would have a significantly negative effect on the local area and its residents.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Kenny Wells

Full name: Kenny Wells

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I am unable to to comment if the local plan has been actioned legally as I do not have enough knowledge in this area

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.
- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.
- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values. Also the completion of this form, not all residents have access to this form, this then makes it undemocratic surely and inturn not legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Flooding:

- Feniton regularly floods as do the roads in and out. During wet weather you have to consider which way is the safest drier route out of the village-more houses will mean more
- EDDC continues to ignore the flooding, the disruption it causes, including the stress and damage it creates. Some residents even have had sewage in their gardens and homes during the flooding
- If you build more houses the flooding will be worse, as the drainage is not sufficient. The Alleviation scheme is just going in and we have no idea if this will work or is simply moving the problem elsewhere
- Builders have not fulfilled previous promises and in fact at Acland Park not even finished the development.
- At times the village becomes almost cut off, with some of us struggling to get home, the diversion of the water will mean Pattesons Cross will be worse, in 2022 I rescued an elderly neighbour from this location leaving her car in the flood water.

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

Lack of Sustainability:

- There has been no changes since the 2014 Super Enquiry, when the Planning Inspector determined and EDDC agreed, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry and it is too early to see the effect this has and what other issues it causes.
- There is a lack of adequate public transport, this will mean more cars on our already busy pot holed roads

- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic. This was apparent during local closures and the carnage that ensued is well documented.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic. And in fact this area also floods, in turn Ironridge has flooded at least 6 times in two months
- Feniton Primary School is at capacity and in great need of a building upgrade, no extra space available. Summer sports already plays on football club fields.
- Local GP services are at capacity and no NHS dentist.
- This scale of development in Feniton is unsustainable but EDDC seems to be ignoring this. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy totally ignoring input given during the super enquiry.

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village, soon it will be a small town!

Employment site Otry_20:

- Absolutely ridiculous proposal to put an Employment site in this location. Unsafe in many ways. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane.

- This Site is also accessed via Broad Lane which has very similar issues to Green Lane. No doubt it will attract larger vehicles which will cause chaos for people already residing in the area, to say nothing of the noise in the quiet village location.
- As this has been brought forward it could be suggested that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

- Removal of Feni_08 from the draft local plan, this land was not meant to be built on.
- Removal of Otry_20 from the draft local plan totally the wrong place to have such a development

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This all seems to be being pushed through by a backdoor,

hardly involving the locals it will effect. Totally unacceptable to only be able to object by completing this unwieldy complicated form. We have the right to object and give our opinions. The main points being Flooding Inadequate roads Poor infrastructure Broken promises by builders and EDDC Unfinished homes in Acland causing an eyesore and rat homes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sharon Wells

Full name: Sharon Wells

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I am unable to to comment if the local plan has been actioned legally as I do not have enough knowledge in this area

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.
- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.
- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values. Also the completion of this form, not all residents have access to this form, this then makes it undemocratic surely and in turn not legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Flooding:

- Feniton regularly floods as do the roads in and out. During wet weather you have to consider which way is the safest drier route out of the village-more houses will mean more
- EDDC continues to ignore the flooding, the disruption it causes, including the stress and damage it creates. Some residents even have had sewage in their gardens and homes during the flooding
- If you build more houses the flooding will be worse, as the drainage is not sufficient. The Alleviation scheme is just going in and we have no idea if this will work or is simply moving the problem elsewhere
- Builders have not fulfilled previous promises and in fact at Acland Park not even finished the development.
- At times the village becomes almost cut off, with some of us struggling to get home, the diversion of the water will mean Pattesons Cross will be worse, in 2022 I rescued an elderly neighbour from this location leaving her car in the flood water.

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage. Lack of Sustainability:
- There has been no changes since the 2014 Super Enquiry, when the Planning Inspector determined and EDDC agreed, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry and it is too early to see the effect this has and what other issues it causes.
- There is a lack of adequate public transport, this will mean more cars on our already busy pot holed roads
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic. This was apparent during local closures and the carnage that ensued is well documented.

- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic. And in fact this area also floods, in turn Ironridge has flooded at least 6 times in two months
- Feniton Primary School is at capacity and in great need of a building upgrade, no extra space available. Summer sports already play on football club fields.
- Local GP services are at capacity and no NHS dentist.
- This scale of development in Feniton is unsustainable but EDDC seems to be ignoring this. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy totally ignoring input given during the super enquiry.

Disproportionate allocation of houses compared to local need:

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village, soon it will be a small town!

Employment site Otry_20:

- Absolutely ridiculous proposal to put an Employment site in this location. Unsafe in many ways. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane.
- This Site is also accessed via Broad Lane which has very similar issues to Green Lane. No doubt it will attract larger vehicles which will cause chaos for people already residing in the area, to say nothing of the noise in the quiet village location.

- As this has been brought forward it could be suggested that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

- Removal of Feni_08 from the draft local plan, this land was not meant to be built on.
- Removal of Otry_20 from the draft local plan totally the wrong place to have such a development

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This all seems to be being pushed through by a backdoor, hardly involving the locals it will effect. Totally unacceptable to only be able to object by completing this unwieldy complicated form. We have the right to object and give our opinions. The main points being Flooding Inadequate roads Poor infrastructure Broken

promises by builders and EDDC Unfinished homes in Acland causing an eyesore and rat homes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Pauline Wells

Full name: Pauline Wells

Other party name (if relevant): Ruan House

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.:

I question whether the data being used from the University of Plymouth Study from 2022 can legally be used. It has never been corroborated. It was based on Country wide erosion rates and not specific to Sidmouth erosion rates.

2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. The Local Plan was using data from the Beach Management Plan (2016) and, without any scientific rationale, changed to using data from the University of Plymouth. The Local Plan should return to using the data from the Beach Management Plan; it is specific to Sidmouth and would seem to be the best guide to all time periods over the next 100 years.

2. It should take into account the funded Beach Management Scheme intended to reduce the rate of cliff erosion in the next 100 years so that no properties are at risk during this time.

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:

1. The proposed imposition of the CCMA is not based on any proven data erosion rates and should not go ahead. During planning EDDC has looked at three very different analyses of erosion rates - the Shoreline Management Plan (SMP) from 2010, the Beach Management Plan (BMP) from 2016 and the University of Plymouth (UoP) from 2022. All came up with very different calculations. Between drafts of the Local Plan EDDC has changed the erosion rates it is using without any scientific reasons being given. EDDC have decided not to use Plymouth's data for periods past 100 years which might indicate the erosion rates being used could be unreliable.

2. I have lived here for 17 years and have been aware of the cliff falls. The erosion rate I have observed seem to bear no resemblance to the alarming rates calculated by the University of Plymouth.

3. I understood the purpose of a CCMA was to avoid development of new properties. The CCMA should not be imposed because it will restrict, without proof, householders right to change or extend their own properties.

4. EDDC has repeatedly failed to implement sea defences to protect the East Cliffs. The sea defence work in 1995, which was never implemented in its entirety - the 3rd rock island at the Training wall being cancelled without good cause - increased the erosion rate of the East Cliffs. EDDC failed to implement replenishment work of the East Beach promised to alleviate part of the erosion. EDDC took 4 years to complete a Beach Management Plan announced in 2016. Nothing has been done in the last 9 years.

5. The Environment Agency committed 16.5 million to the Beach Management Project (BMP) in 2023; it is believed to be underway and will reduce the rate of the cliff erosion during the next 100 years such that no properties will be at risk. This has not been taken into account and this matters because the results should significantly affect the data being used to justify the CCMA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. The Local Plan should use the Beach Management Plan data because, for the next 100 years, it seems to be the most dependable for all time periods.
2. If the CCMA is imposed - include a statement the CCMA will be removed from the Local Plan once the Beach Management Scheme has been implemented.
3. There should be a commitment to monitor regularly the erosion rates and to keep the future shoreline positions updated with the most recent data
4. The CCMA should not apply any restrictions on the current householders. Do warn anyone applying for Planning permission that their property might be affected by cliff erosion in future years but let them make the decision to carry on with the Application.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

David Henry Welsh

Full name: David Henry Welsh

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo-20 is closer to Budleigh Salterton than Exmouth making the services and infrastructure of Budleigh the preferred choice for residents of Exmo-20 undermining the settlement hierarchy contrary to POLICY OL05 of the local plan. The isolated location of Exmo-20 is unsustainable development and would increase the need for car travel and increase travel congestion contrary to POLICY TR01. Exmo-20 would have a detrimental effect on adjacent designated wild life sites and destroy “tranquillity, wildness and dark skies contrary to POLICY OL01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: David Henry Welsh

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It is contrary to Policy OL05 of the Local Plan because the facilities in Budleigh Salterton are nearer than those in Exmouth and thus the ones the residents of Exmo20 would be more likely to use. It would thus coalesce Budleigh and Exmouth. Therefore an alternative site should be selected. The chosen site should avoid harming the adjacent Pebblebed Heaths which are at risk under the present proposals. (See Policy PB01). Local wildlife would also be at risk. Exmo 20 would endanger local heritage sites, in particular St John in the Wilderness church and churchyard. The church and churchyard are treasured and meaningful for local residents. Unsuitable change would be contrary to POLICY HE02. Wildlife and the tranquil atmosphere in the area would be threatened (contrary to POLICY OLO1) as would also local veteran trees and hedgerows. Similarly air quality is in all probability at risk. Exmo20 would also potentially increase flood risk along Withycombe Brook which would conflict with Policy AR01B. Inevitably there would be increased traffic movement as residents accessed essential services. It is very hard to imagine more than a very small minority choosing to walk or cycle. This conflicts with POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Ideally remove Exmo20 from the Local Plan. Failing that, addressing the size and access points would offer some improvement but not nearly enough to justify going ahead.

Full name: David Henry Welsh

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, which would likely make Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, conflicts with POLICY OL05 of the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Shirley Westall

Full name: Shirley Westall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Mr I White

Full name: Mr I White

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: GH/ED/72a and GH/ED/73 are situated within the coastal protection area and part of the Pebblebed Heath. These would fragment and isolate habitats and destroy wildlife corridors, contrary to paragraph 13.23. of the local plan. The wildlife corridors in these sites in particular take wildlife from the Exe estuary at Lympstone up to the Pebblebed Heath and Common. Development would be detrimental to irreplaceable habitats, veteran trees and species rich in hedgerows across the site contrary to paragraph 13.9. Both sites are upstream of the world renowned RAMSAR Exe estuary mudflats and the loss of infiltration in an area which regularly floods will then flow from these sites down into those mudflats destroying habitat. This is in conflict with policy AR01B.

Both sites have been assigned in the local plan contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas. The Exe area around the village of Lympstone has stunning views of the world renowned RAMSAR site on the Exe estuary. This area is visited by tourists and ornithologists from all over the world but EDDC have ignored the speeches by zoologists and environmental specialist and allowed these sites to be put forward even though they are in the CPA.

Both these sites would increase the need for car travel and increase congestion on the A376. Lympstone as a small village has been targeted for housing using the excuse that it has a railway station. In truth, the majority of journeys to work, school and weekly shop is done by car. The increase in traffic congestion is in conflict with paragraph 11.2.

It is unsustainable development. People would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6.

Lympstone, being on the River Exe, only has one direction out and exclusively onto the A376. The access lanes already flood regularly making the village inaccessible. These sites in particular will exacerbate the flooding and access issues.

Site 72a is in Woodbury parish and the detriment it will bring to Lympstone village by putting pressure on already full services and infrastructure such as school, doctor, parking, flooding etc is against policy OL05 and even worse, Lympstone Parish Council and our EDDC councillors were banned from speaking at the strategic meeting for these sites.

LYMP_07 is upstream of Lympstone on the main rainwater catchment area of Wotton Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Lympstone Village. This is in conflict with Policy ARO1B.

LYMP_07 has been assigned in the local plan contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas. The Exe area around the village of Lympstone has stunning views of the world renowned RAMSAR site on the Exe estuary. This area is visited by tourists and ornithologists from all over the world but EDDC have ignored the speeches by zoologists and environmental specialist and allowed these sites to be put forward even though they are in the CPA.

Developing LYMP_07 would fragment and isolate habitats and destroy wildlife corridors, contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

LYMP_07 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. People would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The services and infrastructure of Exmouth (Supermarkets, High Street, Doctor's, school, beach etc) would be the obvious choice for residents of LYMP_07. This would lead to coalescence of Lymptstone and Exmouth , contrary to POLICY OL05 of the local Plan. The Village of Lymptstone and town of Exmouth have fought hard over decades to protect both settlements from coalescence. This was communicated loudly to the EDDC strategic planning committee who chose to ignore this very important strategic plan of the two settlements.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As above

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As above. This consultation exercise is designed to be opaque and inaccessible, preventing citizens from making their views known. It is disgraceful.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As above.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Eric White

Full name: Eric White

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

I am also very concerned that a recent event was held by Bloor homes, setting out plans for this development. This was before the area had been designated for building.

This raises suggestions that this is a "Done Deal" and negates any validity of the consultation.

Exmouth has also seen a recent building boom, which has put immense strain on the sewage system. We only have to look at recent events, such as the burst pipe and almost constant raw sewage overflows on the beach and Maer. Any assurance from South West water that the system can take another large increase in housing should be backed by a period of say two years without constant pollution incidents. The storm overflow system should be only for exceptional events, not as at present when any sort of rainfall causes it to overflow.

Francis Raymond Whiteley

Full name: Francis Raymond Whiteley

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL01

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.:

There is no mention of sequencing. Activity that does not enhance nor conserve the NL is only permitted IF there is no other place outside the NL which will serve. The Local Plan shows there are other areas outside the NLs that are available. The local plan MUST STATE that the building on NL must be done AFTER ALL other options are exhausted. The LivertonLand (March 6th) meeting shows that this land is the FIRST to be built on, while other areas remain undeveloped. The plan is over many decades and many Parliaments. The underlying drivers WILL change over time. This means that there is real risk that NL/ANOB land could be unnecessarily destroyed should the housing in East Devon no longer be desired/ NL/ANOB must be the last to be developed.

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The SEQUENCE of the developments (outside NLs followed by inside NLs) must be indicated on the plan.

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: The chapter does not protect NLs as well as it should.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: All development on NLs should not be allowed until all other areas are COMPLETELY exhausted. It is too easy to allow developments within NLs to become death by a thousand cuts or vaguely plausible justification. This will be accelerated unless the premise that the NL is the LAST land to be developed is absolutely adhered to.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure this IMPORTANT aspect is addressed.

joannah whiteley

Full name: joannah whiteley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

? Revert to Exmo _20b as previously proposed,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Francis Raymond Whiteley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: “Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8

years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Currently the Waste Water Treatment Works at Maer Lane has capacity only to process dry weather situations, approximately 125 litres/second. The maximum throughput is around 240l/s. But the difference is required to clear the storage tanks (aka Balance Tanks) before the next rainfall. This clearly fails between 70 and 100 times a year as the Combined Sewer Overflows (CSOs) are activated. This breaks the current Environment Agency Permits. South West Water cannot therefore cope with the current load let alone a greater one. The number of activations will go up considerably as the differential between maximum throughput and dry flow rates reduces: It will not be linear. This Policy deliberately breaks the law and forces SWW to break the law as well.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: No development can be allowed until after the planned upgrades to the Waste Water Treatment Works is completed and is shown to be legally compliant,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The hearing needs to be shown explicitly why the sewage system is above maximum capacity.

Sonny Alexander Wightman

Full name: Sonny Alexander Wightman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to BudleighSalterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth,

which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sally Elizabeth Wilde

Full name: Sally Elizabeth Wilde

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: I

wish to object to the following part of the EDDC Emerging Local Plan Consultation is, as follows: I am challenging policy SD29: Strategic Allocations in Whimble, particularly to the allocation of Whim_08a (Land west of Bramley Gardens) site in the EDDC Emerging Local Plan. The objection is on the grounds of soundness in that the allocation and policy is not based on solid evidence. The EDDC Strategic Planning Committee considered the Whimble Site Selection Report at a meeting on 1 October 2024. Professional planning officers identified and assessed the potential sites in Whimble and using their professional judgement, backed up with sound evidence recommended to Members whether to allocate the site or not. In the case of Whim_08 site, officers recommended that the site was not allocated for the following reasons:

- Scale of development incompatible with spatial strategy.
- Site lacks safe and convenient pedestrian access to services and facilities in the village.
- The site forms part of the 'Green Wedge' between Whimble and Cranbrook.
- Forms an important part of the very attractive rural landscape setting for the settlement.
- Potential impact on unconfirmed wildlife site.
- Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation. In the earlier phases on consultation, Planning Officers held a Public Consultation event at the Victory Hall, Whimble. This site was never considered as being appropriate for development at that event and, in fact, when local residents asked the question, the

Officers in attendance vehemently denied that it was a possibility for consideration. At the meeting on 1 October 2024, Members of the committee voted to go with the officer recommendation and not allocate the site. However, at the Strategic Planning Committee meeting on 1 November 2024 Members did a complete u turn and decided to allocate part of the site, contrary to Officer recommendation. There was no justification or reason given as to why this site was picked above any others in Whimble or other sites in the east Devon area. Also no additional work appears to have been completed by officers to assess the risks relating to this site before allocating it. This gives the appearance of the Strategic Planning Committee having a knee jerk reaction to needing to allocate additional houses across the district without considering a fully worked up proposal or sound justification (based on evidence and facts), as to why the site should be allocated (partially or otherwise). This site allocation report also considers 'If whole site is not suitable for allocation, could a smaller part be allocated?' The view of the professional planning officers was 'No'. Again, this leads me to challenge the soundness of any allocation of this site, whether full or partial. Taking the list of reasons drawn up by officers as to why the site should not be allocated, I would like to make the following comments: Scale of development incompatible with spatial strategy. Policy SP01: Spatial Strategy section E states 'Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.' The EDDC Site Allocation Report for Whimble states 'Whimble is a is a 'Tier 4' settlement, where the draft local pan seeks to promote limited development to meet local needs. The development of up to 180 dwellings on Whim_08 is considered to be excessively high in relation to the scale of the existing village. As part of the work on the Whimble Neighbourhood Plan, our Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states 'The survey identified a need for at least 4 affordable homes within the next 5 years.' I do not class a total allocation of 83 homes in Whimble to be 'limited development' (Whim_11 total of 33 homes; Whim_08a total of 50 homes), especially when the Whimble Housing Needs Report lists a significantly lower figure. I also suggest that the allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01: Housing to address needs, which states 'This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.' In addition to this, there are developments planned in neighbouring areas e.g. Cranbrook. This includes the current Cobdens Expansion of Cranbrook, part of which is still in the Whimble Parish Area, where 1500 houses, a school and a travellers site have already been approved by the Strategic Planning Committee. These sites have a far better infrastructure than Whimble Village so why

has the additional housing requirement not been allocated at these sites? Site lacks safe and convenient pedestrian access to services and facilities in the village. Access to the site and potential development would be through Bramley Gardens and onto Church Road. Church Road is the main route into the Village and is a narrow and dangerous road. The section of Church Road nearest to the Square and village shop is single track road with houses either side of the road. There is no pavement along the stretch of Church Road to The Square and School Hill. Whimble Parish Council and Villagers have raised concerns about the volume and speed of traffic on that road. There is so much concern about the volume and speed of traffic along Church Road that Whimble Parish Council has convened a Community Speed Watch Group to monitor the traffic and speed along that road. The Police confirmed that Church Road is not recommended as a safe route to the Primary School, Village shop, church or railway station. To access the village shop in the Square and the Primary School in School Hill villagers would have to walk down Church Road which has no pavements. Therefore, there is no safe and convenient pedestrian access to services and facilities in the village. To ensure safety most people would probably use their car or vehicle to access the village shop or primary school. This is not sustainable and surely would be against EDDC Emerging Local Plan Policy TR01: prioritising walking, wheeling, cycling and public transport and is also contrary to the EDDC Climate Change aspirations. The site forms part of the 'Green Wedge' between Whimble and Cranbrook. The EDDC Emerging Local Plan Policy OL05: Green Wedges states 'Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.' I challenge the soundness of the proposed allocation, due to the Green Wedge. The Allocation of this site would potentially damage the individual character or identity of Whimble. This site forms an important part of the very attractive rural landscape setting for the settlement. This would also lead to settlement coalescence between Whimble and Cranbrook, which is a material planning issue, and clearly demonstrates that this site should not be allocated in the Local Plan. This was the view of the EDDC professional Planning Officers. Potential impact on unconfirmed wildlife site. This a wildlife site which is home to bats, owls, woodpeckers, deer and badgers. Any development of this site would be contrary to EDDC Emerging Local Plan Policy PB03: protection of irreplaceable habitats and important features. Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation. There is no evidence to suggest that officers have carried out further work relating to the flood risk before consideration was given to a partial allocation. Therefore, I suggest that there is no sound evidence for allocating this site in the EDDC Emerging Local Plan and that it is contrary to Policy AR01: Flooding. Other comments The residents in Whimble have not said that they are against development. But the issue is the size and location of the development. It is my

view that development would be better placed in Cranbrook or elsewhere in the district where there is appropriate infrastructure. As set out earlier there is no sound justification as to why the Strategic Planning Committee decided to go against the professional judgement of the Planning Officers and allocated this site in the Emerging Local Plan. Also, in terms of soundness, the Strategic Planning Committee does not appear to have fully considered a number of other options that could have been chosen. I believe Whimble Parish Council is looking at Site Allocations as part of the evidence base for its Neighbourhood Plan. The Parish Council is considering a number of sites, which are: Whim_03 Land to the south of Grove Road Whim_07 Land south of Broadclyst Road Whim_13 Land north side of Grove Road Whim_18 Land to the east of Church Road Whim_20 Land to the north of Plumtree Lane My preference would be that a site is allocated to the east of Church Road so that it is nearer to the established infrastructure near the Hand and Pen. It is appreciated that there are constraints to these sites but I challenge that there are constraints with site Whim_08a, hence why the EDDC professional Planning Officers recommended that the site was not allocated. It is my view that further work should be carried out on all of the sites by the professional Planning Officers before any allocation is made in Whimble. Summary I believe that Policy SD29: Strategic Allocations for Whimble, specifically site Whim_08a is not sound, as the decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made to partially allocate the site. Therefore I demand to see the modification of site Whim_08a being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the district (outside of Whimble Village), where there is appropriate infrastructure.

Susan Williams

Full name: Susan Williams

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth or Budleigh Salterton to allow building on Exmo_17.

Victoria Williams

Full name: Victoria Williams

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The most local town Budleigh Salterton does not have the infrastructure to cope with additional stress and will upset the settlements independence from Exmouth. The coalescence of the two towns is against POLICY OL05 of the local plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

Seann Sara Williams

Full name: Seann Sara Williams

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Seann Sara Williams

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site. The current proposed site will cause harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. It will destroy the tranquility, wildness and dark skies of the countryside, which is contrary to POLICY OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats regulations assessment (30.01.25) confirms that there is currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre

for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

?The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sylvia Wills

Full name: Sylvia Wills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Main access point of Exmo-20 is significantly closer to Budleigh Salterton than Exmouth. The services and infrastructure of Budleigh (High St, Doctors, School etc) would be preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to Policy 0L05 of the Local Plan. Exmo_20 would harm the adjacent Pebblebeds Heaths. Is contrary to HELAA the site selection methodology & Policy PB01 & not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. Exmo_20 would have a detrimental effect on this open countryside site & adjacent designated wildlife sites, eliminating the "tranquility, wildness & dark skies contrary to Policy 0L01. Exmo_20 would be in conflict with Strategic Nature Area 368, fragmenting isolating habitats & destroy wildlife corridors contrary to Para.13.23 & Para.13.9 of the Local Plan. The main site access proposed is opposite the SAC/SPA. Exmo_20 would increase car travel, congestion on an already busy B3179 road. This isolated location provides unsustainable development as residents would need to travel much further for existing key services and facilities contrary to Para. 11.6. It is too far from any town to use walking or cycling as transport contrary to Policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I wish to witness first hand how the proposal is dealt with

Beatrice Wilson

Full name: Beatrice Wilson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I am writing regarding the

This development could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

For these reasons, I strongly urge the Planning Committee to reject this proposal.

LAURA WILSON

Full name: LAURA WILSON

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

? Revert to Exmo _20b as previously proposed,

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beatrice Wilson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

? Revert to Exmo _20b as previously proposed,

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Barry wilson

Full name: Barry wilson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Lack of infrastructure Dangerous road

Christopher Wintrell

Full name: Christopher Wintrell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

Full name: Christopher Wintrell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: A fe

Scott Wolfe

Full name: Scott Wolfe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed entrance/exit onto an already over trafficed A35 that can take 5 mins or more to pull onto, even worse in summer, a road with a high rate of accidents resulting to deaths or serious injury in this area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Building on sites already under development to the west and north of the town are more suitable and enviromentally viable.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The town is alredy suffering from over population regarding amenities, it is impossible to get a NHS dentist, an appointment at the surgery is just as bad and the local scool classrooms overcrowded

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Andrew Wolstenholme

Full name: Andrew Wolstenholme

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

I also want to add, that the local sewerage system already cannot cope with the existing demand in this area & us locals have had to put up with a lot of disruption. Building over 400 new houses on the surrounding fields is only going to worsen the amount of run off & further increase demand on the system. We are fed up of these issues & don't deserve the inevitable future problems this build will bring us.

This council was elected to represent the best interests of the local community. This proposal goes against what the vast majority wants & would be damaging to the town & its treasured green spaces! We want a town that we can be proud of again & not become another over crowded, built up dirty embarrassment!

We have already had our fair share of new build developments, Maer Valley, Littleham hill, Pankhurst & Dinan Way. This council needs to stop now, enough is enough!

Jenna Wolstenholme

Full name: Jenna Wolstenholme

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Emmie Wood

Full name: Emmie Wood

Other party name (if relevant): budleigh riding school

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Belinda and John Wood

Full name: Belinda and John Wood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Green Field sites are not for building on, they are for Nature, which should have a 'seat', in It's own right, at the table of any planning meeting, as already happens in some other countries. There are many empty properties and 'brown field' sites, which can be used and many urban sites, which companies keep unused, for their own ends.

The issue of second home owners, who buy up the properties which would be homes relatively affordable for the youngsters, has started being addressed, with higher taxes, but more must be done.

There are architects around now, who have designed pre fab. homes which are eco-friendly and affordable for the single person and those starting out on the property ladder. It would be wonderful if EDDC were at the forefront of promoting these.

The main access point of Exm_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the “tranquility, wildness and dark skies”, which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsuitable development as residents would need to travel

much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Lotti Wood

Full name: Lotti Wood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Nick Wood

Full name: Nick Wood

Organisation (where relevant): Geotechnics

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo 20 would destroy the tranquility wildness and dark skies of the countryside which is contrary to policy OL01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmouth from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Lindy Woodage

Full name: Lindy Woodage

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan Revert to Exmo_20b as previously proposed

Callum Wright

Full name: Callum Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: to make our objections known

Kerri Wright

Full name: Kerri Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via Southern Wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Dougie Wright

Full name: Dougie Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: to make our objections known

Full name: Dougie Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: to remove Exmo_20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: so we are heard

Michael Wright

Full name: Michael Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 development should be located at another site because : It would cause harm to Pebblebed Heaths (SAC / SPA). It is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. It is contrary to POLICIES of the Local Plan PB01, 0L01,0L03, TR01, 0LO5 and also to paragraphs 13.23 and 13.9. It conflicts with POLICIES 0L09, PB04 and AR01B. It is also contrary to POLICIES HE02, TR01 and 0L05.

Exmo_20 would seriously overload the services and infrastructure of Budleigh Salterton and rapidly cause the coalescence of Budleigh and Exmouth which is directly contrary to POLICY 0L05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan completely or reduce the size of Exmo20 by 75%.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

John Wright

Full name: John Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There is no consideration of traffic and the impact it will have on the surrounding area, just like Plumb Park in Exmouth. The need for housing overrides the impact.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Don't allow the new planning in Exmouth.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Lack of traffic infrastructure and lack of schools, primary and secondary schools.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Refuse permission.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Lack of consultation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Concerned residents.

Full name: John Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I

have been a resident of Exmouth for 54 years. I am writing to object to the development of the site known as Exmouth_20. This is an amalgamation of the larger and smaller site either side of St Johns Road, and clearly there are objections on applying to the size and location of the larger site bordering the 83179. My objections are the traffic onto this road and then through Woodbury or down St Johns Road, for access to the closest schools. Then there is the proximity to the SSI sites, the lack of pavement and the danger of the road. I used to live in Lymptone and note that the councillors there, and in Budleigh seem to have much firmer voices than the Exmouth ones. I believe they have held up the Dinan way link for far too long. I would like to concentrate my comments on the effects of developing the smaller western side of Exmouth20. My objections are on the following grounds: Water Springs in Great Wood. A culvert travels down the far side of the private lane accessing Bystock Stables that could become a road to the site or public footpath. We have noted an increasing amount of run off water during the last few years that flows down St Johns Road and also down the private lane. We would expect the development drainage and sewerage to be a challenge as it would flow into the site you have chosen to develop. The topography of the ground is of gullies and culverts and then the Dinan way is higher in height We believe that the land will be flooded as a result. Mains Water infrastructure Please do not accept any reports from South West Water to say that their mains water infrastructure is robust enough to take on the buildings. We have seen frequent repairs and attempts to repair where the above springs coincide with their pipes. We have also seen a repairs cause a burst main 30 metres above the repair and a stream run down the road in less than a week.

Wild life The woods that are bordering the western side of the site have been untouched for many years. It is particularly important to stress that the wet nature of the woods, including ponds and the dense scrub that will be affected, with animal pathways lost. It

is worth mentioning the bats, because we have the following experience of these. When developing some outbuildings to make Owls Cottage, 5 bat boxes were installed and the only bat resident of the buildings was removed by an expert. (This bat shunned the bat box he bought to place him in and flew off to the woods). Needless to say you will not be able to replace the tree habitats with enough bat boxes if our house had to install five. As evidence of the population, we now have over 30 bats living in the Owls Cottage's wooden cladding: they still shun the boxes. Trees On the western side of Exmout_20 , there is possibly the largest East Devon oak tree. I have not verified this but hope some survey will be commissioned to do so. Listed Buildings and sites of interest

1. St John's in the Wilderness and burial ground. Anyone who has visited this outstanding location will know its' name is apt because it is surrounded by country side. Building around this site will be a tragedy for an accessible and tranquil location that worshippers and mourners can access by bus and a short walk.
2. There is a location in the western side of the 20b site where underground bunkers were installed in world war two for covert operations.
3. I co -own of the listed property, known as St John's Lodge, listed buildings site ref: 1164796, under the name Higher Lodge. N.B. It is the second property in the county with rustic pole cladding, the other building being the Bear House at Killerton and should be considered with similar gravitas. St John's Lodge was developed, by the Bystock Court estate, to be a gardeners cottage and have a rural flavour added for the Courts owners when brought his visitors to the cricket pitch in the next field. This anecdote is not widely known but is why it has the rustic pole cladding. In summary, site Exmouth_20 (particularly the Western side of St Johns Road,) is unlikely to provide the low cost homes that our town desperately needs. The land topography and mitigation costs will be high. Trees and bat surveys should take place, water run-off from natural springs and the historic locations have to be preserved and enhanced, as they are in other East Devon locations. Finally, I am skeptical about the provision of infrastructure. I have seen the estates, on the outskirts of Exmouth. All the traffic has to funnel, to town or to Exeter and this will continue, even with the new link, which is now 30 years too late. We have noted that although large numbers of houses are supposed to be supported with schools, shops and surgeries, which seemed to be your main reason for

choosing this large site. The developers have often split up the sites and do not seem to be adding in anything for commercial units. This will be meaning even more traffic going through Woodbury and on to Exeter. The roads are single lane, the productivity and commercial aspects of the town are not considered. You have allowed the construction of many elderly care flats in our town but have not helped improve health care services with your planning policies. Please consider the whole impact of this development on

the surgeries and schools we have. Please consider low cost housing options. As a builder, I will be very surprised if any developer will see this site with lovely sea views as low cost.

Rebecca Wright

Full name: Rebecca Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am a resident of Exmouth for 66 years. I am writing to object to the development of the site known as Exmouth_20. Exmouth_20 is an amalgamation of the larger and smaller site either side of St Johns Road, and clearly there are objections on applying to the size and location of the larger site bordering the B3179. My objections to the larger side are as spoken in your meeting, the traffic onto this road and then funneling through Woodbury or squeezing down St Johns Road, for access to the closest schools. (Unsound in relation to policy TR01) Then there is the proximity to the SSI sites, (unsound SAC/SPA/SSSI) and the dangerous nature of the road. All these objections were raised at your last meeting but I note that the Lympstone councillors, who maneuvered for this site, were not there to hear these raised. (unsound based on (HELLA stage 2 regulation consultations). I was glad to see that although developers of the site think that cycling is going to take place, councillors realized this was a ridiculous argument but sadly this false claim had no impact on the choices the Strategic Planning committee made in preferring this site to others. This was unsound based on TR01. I would like to concentrate my comments on the effects of developing the smaller western side of Exmouth_20 My objections are on the following grounds: Water Springs in Great Wood we know above our property. A culvert travels down the far side of the private lane accessing Bystock Stables that could become a road to the site or public footpath. We have noted an increasing amount of run off water during the last few years that flows down St Johns Road and also down the private lane. We would expect the development drainage and sewerage to be a challenge as it would flow into the site you have chosen to develop. Unsound on the basis of AR01(B)

The topography of the ground is of gullies and culverts and then the Dinan way is higher in height We believe that the land will be flooded as a result. AR01(B) Mains Water infrastructure Please do not accept any reports from South West Water to say that their mains water infrastructure is robust enough to take on the buildings. We have seen frequent repairs and attempts to repair where the above springs coincide with their pipes. We have also seen a repairs cause a burst main 30 metres above the repair and a stream run down the road less than a week later. I do not trust South West Water to report correctly as they have failed to do this with other local developments. Wild life The woods that are bordering the western side of the site have been untouched for many years. It is particularly important to stress that the wet nature of the woods, including ponds and the dense scrub that will be affected and wild animal pathways lost. It is worth mentioning the bats, because we have the following experience of these. When developing some outbuildings to make Owls Cottage, 5 bat boxes were installed and the only bat resident of the buildings was removed by an expert. (This bat shunned the bat box he bought to place him in and flew off to the woods). Needless to say you will not be able to replace the tree habitats with enough bat boxes if our house had to install five. As evidence of the population, we now have over 30 bats living in the Owls Cottage's wooden cladding: they still shun the boxes. Although this is personal evidence,, I would like you to consider how you could mitigate for the loss of the habitat, which clearly will not be cheap Trees Exmoputh_20 west of St Johns road, there is possibly the largest East Devon oak tree. I have not verified this but hope some survey will be commissioned to do so. Listed Buildings and sites of interest

1. St John's in the Wilderness and burial ground. Anyone who has visited this outstanding location will know its' name is apt because it is surrounded by country side. Building around this site will be a tragedy for an accessible and tranquil location that worshippers and mourners can access by bus and a short walk.
2. There is a location in the western side of the 20b site where underground bunkers were installed in world war two for covert operations. This is not well known
3. There is a historic gateway and door in the road that would have given access across the fields to Bystock court to attend the church services.
4. I co -own of the listed property, known as St John's Lodge, listed buildings site ref: 1164796, under the name Higher Lodge. It is the second property in the county with rustic pole cladding, the other building being the Bear House at Killerton and should be considered with similar gravitas. St John's Lodge was developed, by the Bystock Court estate, to be a gardener's cottage and have a rural flavour added for the Courts owners when brought his visitors to the cricket pitch in the next field. This anecdote is not

widely known but is why it has the rustic pole cladding. I do not think the building will be impacted at present, but I am including it because I know the National Trust , were able to shift the new link road from A la Ronde, but we, the local residents have no voice in such issues. Where is the democracy if only the large organizations are heard.? In summary site Exmouth_20 is unlikely to provide the low cost homes that our town desperately needs. The land topography and mitigation costs will be high. Trees and bat surveys should take place and it should be looked at seriously because of the water run-off from natural springs and the historic locations have to be preserved and enhanced, as they are in other East Devon locations, on the western side. Finally, I am skeptical about the provision of infrastructure. I have seen all the estates, on the outskirts of Exmouth, built during my lifetime. All the traffic has to funnel, to town or to Exeter and this will continue, even with the new link, which is now 30 years too late. We have noted that although large numbers of houses are supposed to be supported with schools, shops and surgeries(OL05), which seemed to be your main reason for choosing this site, the developers have often split up the sites and do not seem to be adding in anything for commercial units. I note that this has occurred on the Gulliford Farm site where a supermarket was supposed to go, there now seems to be a planning application for 38 more houses. I do not believe that any more large developments should take place without the addition of a dual carriage way instead of the current roads in and out of the Exmouth funnel.

Jennifer Young

Full name: Jennifer Young

Organisation (where relevant): Member of Ova

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo20 is closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient accessible town. The services and infrastructure of Budleigh (High Street, Doctors, school, etc) would be the preferred choice for residents of Exmo 20. This undermines the settlement hierarchy and would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY O L05

An alternative site to Exmo-20 for housing allocation should be selected, one of which was deemed available, achievable and suitable in the HELAA Exmo-20 would cause harm to the adjacent Pebblebed Heaths (SSSI/sAC/SPA/NNR) due to Exmo-20 being a supporting foraging habitat. Allocating Exmo-20 is contrary to HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo-20 would cause harm to heritage assets at Saxton /Norman/Medieval settlement, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

Exmo-20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites., eliminating the 'tranquility, wildness and dark skies' which is contrary to POLICY L91. I am particularly in favour of keeping dark skies.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from Local Plan

Simon Young

Full name: Simon Young

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: For the land at Whim11 at Station Rd, it is suggested that it will be possible to extend a footpath behind the hedgerow, coming out opposite The Withey. This would not be possible as the land opposite The Withey entrance belongs to Slewton House, which I own, and is not available for sale or development. This would mean that any idea of extending a footway along adjacent to Talaton Rd as far as The Withey entrance would not be a possible outcome of any development.

In addition, for both developments in Whimble the number of proposed houses is too great for the village. Most of the roads are single track and extra traffic would pose a danger to pedestrians and gridlock along the narrow roads.

Both sites are precious for wildlife and vital for the habitat of rare species. Once built upon they would be lost forever, permanently putting further pressure on vanishing insect life, birds and mammals.

Both sites are precious to the villagers. One is the old cricket pitch and the other an ancient orchard. They are historically important and no one wants extra houses on either site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The suggestion of a footpath at the Whim11 site should be removed as it is not possible . Any idea of a a footpath being an advantage to the village is erroneous.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Andrea Young

Full name: Andrea Young

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Yes but I do not agree with the proposal

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Both proposed developments in Whimble would put extreme pressure on the village. There is a single track road which is the direct route between the two sides of the railway line. There is only pavement in parts and the village school is on the route. Additional traffic on the road would lead to gridlock and danger to pedestrians.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Whilst I appreciate the pressures from central government, further development in Whimble is inappropriate. The roads are too narrow for flow of traffic with the main route north/south along Church Rd, Broadway, School Hill being largely single track with a blind bend by the church, with no continuous pavement. It would be very unsafe to introduce additional vehicles and an increase of 83 houses within the village would lead to hundreds of new vehicle movements a day, leading to gridlock and accidents on roads not designed to cope with traffic.

Both sites are havens for wildlife. Both are hunting grounds for the large population of owls, woodpeckers, tree creepers and other birds which nest in the trees nearby and in the TPO trees. Bats are also present at both sites. The eco systems are extremely

precious and once lost would be gone forever, leading to collapse of local populations of protected species. The locals do not support this.

There are flooding problems already within the village. Cranny Brook floods in heavy rain and additional areas of tarmac would exacerbate the problems. As climate change takes place things will become worse without additional stress on lower areas of the village, which risk flooded homes and danger to life in floodwaters.

The local infrastructure is inadequate for these levels of development. We have an inadequate sewerage system already cannot cope in high rainfall. The roads are unsuitable and additional traffic will lead to accidents. A pleasant village would be ruined.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the proposed development areas Whim011 and Whim08 as the village cannot support such large development without danger to life and an ecological crisis.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Both sites in Whimble have already been considered by planning officers as being unsuitable for development. The parish council does not support this. The locals do not agree. The planning authority is not taking into account local wishes.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Qian Zeng

Full name: Qian Zeng

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I have a lot of concerns about the plan to have five fixed permanent dwellings for gypsy site at the board between Tithebarn and Pinhoe due to the below: The site has a flood risk, there is always water around the area and I don't think it's fit for purpose for the travelers. The road is a closed road with only one way to get in and out. And the road is very narrow so and it's not wide enough to have caravans to move in. This road only fit for walking and cycling and small vehicles. I thought it meant to be designed for access to the country park. The scouts is opposite to the site so it might pose concerns for children's safety. It's a waste of public money to set up a traveller site which it's not fit for the purpose. I strongly against this idea please reconsider.