

Filtered Data Export

**Full name:** Paul Hayward

**Organisation (where relevant):** Axminster Town Council

**Other party name (if relevant):**

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**Proposal:**

1. Introduction

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

Paragraph

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

1.1

**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.:** Consultation. The use of only on-line notification and comment was considered inappropriate for the population and has excluded a significant number of residents from the planning process. Many East Devon residents do not routinely use (or consider) on-line information and some do not have access to computers. As with many rural areas, internet connectivity can be slow or only sporadically available. It was clear from the meeting that residents had experienced difficulties with both notification of procedures and downloading information. The "Commonplace" facility for on-line comments was not thought to be user-friendly or easy to use. We do not think that the Local Plan draft has undergone either widespread or representative consultation. Residents were concerned that earlier comments on the draft plan did not appear to have been considered in the new draft.

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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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD02

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

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

Evidence base. Although the Local Plan document contains paraphrasing or reproduction of all of the constraints, guidelines and regulations regarding planning applications there appear to be few examples of any of these being considered in the selection of development sites. At best individual site assessments appear to be superficial (and may lack due diligence) and none made any reference to specific constraints or recommendations. There are numerous obvious constraints including lack of access, drainage onto high flood risk areas, biodiversity loss from currently open land, ancient hedgerows and known archaeological remains. (many of which have been repeatedly stated in earlier consultations but not addressed). There is currently no detailed evidence to justify how the sites were selected or preferences ranked, This is particularly concerning as one site was previously considered unsuitable for development in 2023 due to soil contamination, access and drainage issues<sup>1</sup>, constraints that have not changed in the last 2 years. A planning application for 16 houses at another selected site<sup>2</sup> was previously rejected due to access issues. There are numerous constraints that apply to the proposed sites and no justifications provided as to rejection of other “brownfield” sites proposed earlier in the consultation. Although the term “mitigation” has been used there is no detail of what this might entail or potential costs and land usage involved. We believe that there is little point “offering” sites that cannot be developed in practice, As proposed changes to planning processes will involve less public scrutiny we believe it is important that accurate evidence based selections are considered at any early stage. Sustainability. The Local Plan makes brief mention of the previously proposed N/S Relief Road. Without this facility all traffic through or round Axminster must use the single narrow route bordered by listed

buildings or the single track road at Stoney Lane. The developments as proposed would expect to result in a further 1430 cars<sup>3</sup> on already congested single track roads. Existing drainage in the town is already at capacity with frequent surface water flooding events. All drainage goes into the River Axe which has resulted in multiple floods at Weycroft, in the town, at Trafalgar Way and in downstream settlements. Any increase in river level will exacerbate these events and potentially threaten other infrastructure on the border of the existing flood plain such as the railway line. Current medical and dental services are at capacity and the recent reduction in provision at Axminster hospital are real current constraints that need to be considered before the proposed 2,500<sup>4</sup> population increase. Climate change. The site assessments and town plan do not consider the likely impacts of climate change on the existing town, or the proposed development. The single most likely effect of a warmer world is increased rainfall. Most of sites considered are now continually waterlogged from November-March and losing that stored water facility will significantly impact on river levels. As 1 inch of rain on 1 hectare will produce 250 cubic metres of water and 2-3 inches of rainfall in 24 hours is now not uncommon, the plan needs to consider the level of additional mitigation that will be required for the existing town before adding further run-off from the new developments. Joined up thinking. We believe that there is little direct evidence of joined up thinking in the plan. The catchment area for the Axe valley is largely in Dorset and Somerset and the plan provides no details of any proposed developments in those counties that could affect river levels. Existing wildlife, hedgerow, biodiversity and historic constraints are listed in the plan but not applied in any detail to any sites. Some notable examples are Myotis species bats which include Devon Wildlife priority species that are known at Axmi-02. Some of the other wildlife issues that have not been considered include ancient hedgerows and other Devon priority animal plant and fungi species (sites Axmi-02, 08, 09 and others), It seems unlikely that replacing open countryside with built environments will achieve the 10% BNG<sup>5</sup> required under current policies. The sites at Axmi-02 and Axmi-08 contain some 50 acres of the original settlement associated with the Roman Fort at Woodbury<sup>6</sup> and the passing reference in the plan gives no assurances as to how preservation and access to this will be maintained. A significant lack of joined up thinking relates to travel in the area immediately outside Axminster. There appears to be no considerations made of additional traffic loads on the the A35 and A358 which are single carriageway between Axminster both Honiton and Chard and which are already severely constrained at Chideock, Honiton and Chard. Potential developments in Dorset and Somerset will add to the current traffic levels on these routes and in surrounding towns, but do not appear to have been considered. Although the presence of a railway station in Axminster is featured in the plan, the current station car park is already at capacity with “overflow” parking occurring on nearby residential roads. The station car park contains the main entrance to the Mole Avon store and yard and also serves as a bus station. There is no free land to enlarge the station car park and any additional parking in the area would

compromise business access and necessitate finding another site in the town for the bus parking. The one train an hour service on a single track is particularly vulnerable to frequent landslips between Crewkerne and Honiton and these constraints have not been included. As detailed above the railway line borders the existing flood plain and would be at risk if the river level increased. Conclusion The conclusion of the meeting was that the developments in Axminster would not be either sustainable or deliverable as currently proposed. The meeting agreed that there was a need for development proposals to be fully evidence based with appropriate infrastructure development included at the outset. We believe that the absence of these and the other issues leaves the current draft of the Local Plan as “not fit for purpose”.