

Filtered Data Export

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

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 2

2. Do you consider that this part of the Introduction chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: -

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: There is no reference to the fundamental importance of our natural watercourses, and the widely recognised pressures on water quality due to climate change and development. This demonstrates that the Sustainability Appraisal is not robust (it does not adequately address these issues). There is also no evidence in the 'Evidence Library' that water quality issues have been considered. There is now a growing body of local evidence and national reports and guidance on these issues (e.g., the Planning Advice for Integrated Water Management report, and House of Commons Environmental Audit Committee Report on Water Quality in Rivers).

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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.: Include reference to the importance of our natural watercourses under 'Outstanding natural environment', and reference to the increasing pressures on water quality under 'Climate change' in Figure 2. Consider why the Sustainability Appraisal did not flag up these issues that are so critical to sustainable development in East Devon. Please note that these pressures are not just related to the sewage system but also to pollution from roads, agriculture, construction, residential properties and other infrastructure (all exacerbated by climate change).

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

3(a). If yes, and you wish to support the soundness of this part of the Introduction 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 Introduction chapter is not sound. Please be as precise as possible.: The introduction sets the scene for the whole Local Plan. The fact that Figure 2 on key facts completely misses the importance of watercourses and water quality/pollution indicates that the whole Local Plan is not sound. As stated in 2(b), the Sustainability Appraisal does not adequately address water quality issues, and there is no reference to relevant local evidence and national reports and guidance in the 'Evidence Library'.

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.: As stated in 2 (c).

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.: -

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The fact that the importance of the natural watercourses, and the growing pressures on water quality due to climate change and development, are not highlighted in the Introduction chapter indicates that there has been inadequate cooperation and consultation on these issues which relate to both environmental protection and infrastructure planning.

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 highlight the findings of our catchment-based water quality project in Lypstone on the Exe Estuary and our consultations with national specialists and other community groups. We believe the East Devon Local Plan is not sound. It has not considered a major body of evidence at national and local levels, and it does not follow national advice and guidance.

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

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.: 13

2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: -

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.: -

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Biodiversity and Geodiversity 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.: -

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: The introduction and policies are out of date. They demonstrate a lack of consideration of new evidence on the need for more integrated policies and the vital role water quality plays in increasing biodiversity. More joined up thinking is needed.

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.: A more joined up, integrated approach is needed - considering biodiversity, water quality, flood risk, and human health and wellbeing.

4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Our Outstanding Biodiversity and Geodiversity chapter's compliance with the duty to co-operate, please use this box to set out your comments.: -

4(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The fact that this chapter is out of date indicates that there has been limited cooperation with other organisations on environmental protection.

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)

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

Full name: Sara Davies

Organisation (where relevant): Lymestone Water Quality Group

Other party name (if relevant): -

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.: 13.1

2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: -

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.: -

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Biodiversity and Geodiversity 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.: -

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: In the Introduction, Paragraphs 13.1 and 13.2 don't make sense (a lot of words pulled together with no clear meaning).

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.: A more joined up, integrated approach is needed - considering biodiversity, water quality, flood risk, and human health and wellbeing.

4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Our Outstanding Biodiversity and Geodiversity chapter's compliance with the duty to co-operate, please use this box to set out your comments.: -

4(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The fact that this chapter is out of date indicates that there has been limited cooperation with other organisations on environmental protection.

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)

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

Full name: Sara Davies

Organisation (where relevant): Lymestone Water Quality Group

Other party name (if relevant): -

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.: 13.2

2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: -

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.: -

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Biodiversity and Geodiversity 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.: -

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: In the Introduction, Paragraphs 13.1 and 13.2 don't make sense (a lot of words pulled together with no clear meaning).

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.: A more joined up, integrated approach is needed - considering biodiversity, water quality, flood risk, and human health and wellbeing.

4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Our Outstanding Biodiversity and Geodiversity chapter's compliance with the duty to co-operate, please use this box to set out your comments.: -

4(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The fact that this chapter is out of date indicates that there has been limited cooperation with other organisations on environmental protection.

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)

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

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

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.: PB04

2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: -

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.: -

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Biodiversity and Geodiversity 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.: -

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: In PB04 on Habitats Regulations Assessment, the strategy for the Exe Estuary needs to be updated since it does not consider the vital importance of water quality to wildlife in this protected site. This is a local priority and a legal requirement.

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.: A more joined up, integrated approach is needed - considering biodiversity, water quality, flood risk, and human health and wellbeing.

4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Our Outstanding Biodiversity and Geodiversity chapter's compliance with the duty to co-operate, please use this box to set out your comments.: -

4(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The fact that this chapter is out of date indicates that there has been limited cooperation with other organisations on environmental protection.

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)

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

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

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.: PB07

2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: -

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.: -

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Biodiversity and Geodiversity 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.: -

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:
Policy PB07 on ecological enhancement and biodiversity in the built environment is so limited (bat and bird boxes, etc). Opportunities with multiple benefits should be encouraged, e.g., bioretention ponds and wetlands which increase biodiversity, improve water quality, and reduce flood risk.

In PB04 on Habitats Regulations Assessment, the strategy for the Exe Estuary needs to be updated since it does not consider the vital importance of water quality to wildlife in this protected site. This is a local priority and a legal requirement.

In the Introduction, Paragraphs 13.1 and 13.2 don't make sense (a lot of words pulled together with no clear meaning).

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.: A more joined up, integrated approach is needed - considering biodiversity, water quality, flood risk, and human health and wellbeing.

4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Our Outstanding Biodiversity and Geodiversity chapter's compliance with the duty to co-operate, please use this box to set out your comments.: -

4(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The fact that this chapter is out of date indicates that there has been limited cooperation with other organisations on environmental protection.

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)

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

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

Proposal: 17. Implementation and Monitoring

1. To which part of the Implementation and Monitoring chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph or policy number that your representation relates to.: 17

2. Do you consider that this part of the Implementation and Monitoring chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the Implementation and Monitoring chapter, please use this box to set out your comments.: -

2(b). If no, please give details of why you consider this part of the Implementation and Monitoring chapter is not legally compliant. Please be as precise as possible.: There is no information on implementation, and no plans to monitor any indicators of environmental performance. How can you demonstrate progress in sustainable development? Presumably this lack of sufficient plans for implementation and monitoring should have been identified by the Sustainability Appraisal.

2(c). Please set out the modification(s) you consider necessary to make this part of the Implementation and Monitoring 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 Implementation and Monitoring 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.: Provide an implementation plan, and develop a monitoring plan that includes all key indicators of sustainable development (including environmental indicators).

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

3(a). If yes, and you wish to support the soundness of this part of the Implementation and Monitoring 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 Implementation and Monitoring chapter is not sound. Please be as precise as possible.: Insufficient information, as stated above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Implementation and Monitoring 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 Implementation and Monitoring 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 stated in 2(c).

4. Do you consider that this part of the Implementation and Monitoring chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Implementation and Monitoring chapter's compliance with the duty to co-operate, please use this box to set out your comments.: -

4(b). If no, please give details of why you consider this part of the Implementation and Monitoring chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The lack of implementation plans and absence of environmental performance indicators indicates a failure to cooperate with other relevant organisations on environmental protection and infrastructure planning.

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)

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

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

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.: 2.9

2. Do you consider that this part of the vision chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the vision chapter, please use this box to set out your comments.: -

2(b). If no, please give details of why you consider this part of the vision chapter is not legally compliant. Please be as precise as possible.: There is no reference to the fundamental importance of our natural watercourses in East Devon (to the environment, economy, and human health and wellbeing), or to the vital role that the Local Plan should be playing in helping to adapt to climate change, prevent water pollution, increase biodiversity, improve human health and wellbeing, and improve the local economy by enhancing the image of our natural waters.

This demonstrates that the Sustainability Appraisal is not robust (it does not adequately address these issues). There is also no evidence in the 'Evidence Library' that water quality issues have been considered. There is now a growing body of local and national data and guidance on these issues (e.g., the Planning Advice for Integrated Water Management report, and House of Commons Environmental Audit Committee Report on Water Quality in Rivers). Please note that this does not just relate to sewer overflows but also to pollution from roads, agriculture, construction, residential properties and other infrastructure (all exacerbated by climate change).

2(c). Please set out the modification(s) you consider necessary to make this part of the vision 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.: Refer to the fundamental importance of our natural watercourses in East Devon, and to the role of the Local Plan, and related policies and procedures, in protecting and improving water quality. But, first, consider and address the fact that the Sustainability Appraisal does not highlight the importance of water quality issues across all of East Devon, and the lack of evidence on water quality in the 'Evidence Library'.

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

3(a). If yes, and you wish to support the soundness of this part of the vision 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 vision chapter is not sound. Please be as precise as possible.: A strong vision statement is vital to the success of the Local Plan. The fact that it completely misses the importance of our natural watercourses, the growing concerns and pressures on water quality, and the vital role of the planning system in protecting and improving water quality, indicates that the whole Local Plan is not sound. It is not consistent with national policy, does not align with National Planning Policy Framework Section 15, Paragraph 180 (e), and does not reflect the growing body of national and local evidence available on water quality (Note: There is no information in the 'Evidence Library' to show that this evidence has been considered).

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.: Update the vision so it reflects the importance of our natural watercourses, and the role of the planning system in protecting and improving water quality and biodiversity. See 'Planning Advice for Integrated Water Management', <https://catchmentbasedapproach.org/wp-content/uploads/2018/09/Planning-Advice-Note.pdf>

4. Do you consider that this part of the vision chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the vision chapter's compliance with the duty to co-operate, please use this box to set out your comments. : -

4(b). If no, please give details of why you consider this part of the vision chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The fact that the vision does not reflect the importance of the natural watercourses, and the growing pressures on water quality due to climate change and development, indicates that there has been inadequate cooperation on these issues which relate to both environmental protection and infrastructure planning.

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 highlight the findings of our catchment-based water quality project in Lymptone on the Exe Estuary and our consultations with national specialists and other community groups. We believe the East Devon Local Plan is not sound. It has not considered a major body of evidence at national and local levels, does not follow national advice and guidance, and does not address local priorities.

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

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(a). If yes, and you wish to support the legal compliance of this part of the Spatial Strategy chapter, please use this box to set out your comments.: -

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 selection of 'sustainable locations' is based on a flawed Sustainability Appraisal. The latter does not reflect current evidence on water quality, catchment sensitivities, or the concerns raised by local communities. Consequently, development is proposed in areas which are not sustainable, e.g., Exmouth and Lympstone on the Exe Estuary, which is a Special Protection Area, SSSI, and Ramsar site. There is no reference to the Habitats Regulations Assessment.

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.: Review and update the Sustainability Appraisal and Habitats Regulations Assessment to ensure they are accurate and robust. Demonstrate that the Spatial Strategy is seriously considering these assessments, particularly concerning water quality which is a critical issue for East Devon.

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

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy 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 Spatial Strategy chapter is not sound. Please be as precise as possible.: It is not based on a robust and up-to-date Sustainability Appraisal. Some of the 'sustainable locations' identified are not appropriate locations for further development due to the sensitivities of the catchments and water bodies, e.g., in Exmouth and Lympstone on the Exe Estuary.

Suggested modification: Update the vision so it reflects the importance of our natural watercourses, and the role of the planning system in protecting and improving water quality and biodiversity. See 'Planning Advice for Integrated Water Management', <https://catchmentbasedapproach.org/wp-content/uploads/2018/09/Planning-Advice-Note.pdf>

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.: As stated in 2(c).

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Spatial Strategy chapter's compliance with the duty to co-operate, please use this box to set out your comments.: -

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.: The fact that the spatial strategy does not reflect the sensitivities of the catchments and water bodies (e.g., in Exmouth and Lympstone) indicates that there has been inadequate cooperation on these issues which relate to both environmental protection and infrastructure planning.

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)

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

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

Proposal: 5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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(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.: -

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 proposed developments in SD-01 - are not sustainable. The Sustainability Appraisal and Habitats Regulations Assessment are not based on accurate, up-to-date information on water quality risks. The assessments are vague and there is no reference to relevant local and national data and reports on water quality in the 'Evidence Library'.

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.: Consider both local evidence and national reports and guidance on water quality. For example, the Lympstone Water Quality Group can provide evidence on the sensitivity of the Wotton Brook catchment and Exe Estuary. We are not trying to stop development but to ensure that decisions and controls are based on accurate information.

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.: There has been no consideration of water quality/pollution risks associated with the proposed developments in Lympstone (ED10) and at Courtlands Cross (ED01); they are not consistent with national policy and NPPF requirements on pollution prevention; and they do not address local priorities. The sites are in highly sensitive catchments, the water courses flow to the Exe Estuary, a 'European site', SPA, SSSI, and Ramsar site, and the combined sewer system is already overloaded, causing high numbers of overflows into the Exe Estuary. There is now considerable evidence available that developments of this scale cause water pollution if not controlled - due to an

increased volume of surface water runoff contaminated with hydrocarbons, heavy metals, and microplastics.

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 Lymp_07 (100 dwellings) since the risk of water pollution from developments of this scale is too high given the sensitivity of the catchment and the Exe Estuary. For any developments of this scale, highlight the sensitivity of the catchment, and require surface water treatment (e.g., filtration, bio-retention, and constructed wetlands) in addition to flood attenuation.

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.: -

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 fact that development of this scale is being proposed close to the Exe Estuary indicates that there has been inadequate cooperation with Natural England, the Environment Agency, South West Water, and local community groups on both environmental protection and infrastructure planning.

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 evidence from our catchment-based water quality project in Lympstone on the Exe Estuary, and our review of regulatory requirements and best practice standards.

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

Proposal: 5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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(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.: -

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 proposed developments at Lympstone - GH/ED/72a (42 dwellings) and GH/ED/73 (42 dwellings) in SD-10. The Sustainability Appraisal and Habitats Regulations Assessment are not based on accurate, up-to-date information on water quality risks. The assessments are vague and there is no reference to relevant local and national data and reports on water quality in the 'Evidence Library'.

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.: Consider both local evidence and national reports and guidance on water quality. For example, the Lympstone Water Quality Group can provide evidence on the sensitivity of the Wotton Brook catchment and Exe Estuary. We are not trying to stop development but to ensure that decisions and controls are based on accurate information.

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.: There has been no consideration of water quality/pollution risks associated with the proposed developments in Lympstone (ED10) and at Courtlands Cross (ED01); they are not consistent with national policy and NPPF requirements on pollution prevention; and they do not address local priorities. The sites are in highly sensitive catchments, the water courses flow to the Exe Estuary, a 'European site', SPA, SSSI, and Ramsar site, and the combined sewer system is already overloaded, causing high numbers of overflows into the Exe Estuary. There is now considerable evidence available that developments of this scale cause water pollution if not controlled - due to an

increased volume of surface water runoff contaminated with hydrocarbons, heavy metals, and microplastics.

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 GH/ED/72a (42 dwellings), GH/ED/73 (42 dwellings) since the risk of water pollution from developments of this scale is too high given the sensitivity of the catchment and the Exe Estuary. For any developments of this scale, highlight the sensitivity of the catchment, and require surface water treatment (e.g., filtration, bio-retention, and constructed wetlands) in addition to flood attenuation.

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.: -

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 fact that development of this scale is being proposed close to the Exe Estuary indicates that there has been inadequate cooperation with Natural England, the Environment Agency, South West Water, and local community groups on both environmental protection and infrastructure planning.

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 evidence from our catchment-based water quality project in Lymptone on the Exe Estuary, and our review of regulatory requirements and best practice standards.

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

Proposal: 7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 7

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the Adapting to Climate Change chapter, please use this box to set out your comments.: -

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.: The absence of any policy on water quality and biodiversity in this chapter is a major omission. It is well known that extreme weather caused by climate change is having a significant impact on water quality and biodiversity, and these issues must be considered in a strategy to adapt to climate change (alongside flood risk). This omission highlights the fact that the Sustainability Appraisal is flawed and, therefore, the Local Plan is not legally compliant.

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.: Include a policy on water quality and biodiversity in this chapter - recognising the need for integrated water management to adapt to climate change effectively (see <https://catchmentbasedapproach.org/wp-content/uploads/2018/09/Planning-Advice-Note.pdf>). Review and improve the Sustainability Appraisal, particularly in relation to water quality, and ensure this is used effectively in this final stage of the Local Plan development.

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Adapting to Climate Change 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 Adapting to Climate Change chapter is not sound. Please be as precise as possible.: As stated above, the absence of a policy on water quality and biodiversity in this chapter is a major omission, and demonstrates that the Local Plan is not sound. There is also no evidence in the 'Evidence Library' on water quality despite a growing body of national and local data, reports, and guidance on water quality and the need for an integrated water management approach to climate change (considering flood risk, water quality, and biodiversity).

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.: As stated in 2(c).

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: No

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.: -

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 omission of water quality and biodiversity in this chapter strongly indicates a lack of effective co-operation on environmental protection and infrastructure planning to adapt to climate change.

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 highlight the findings of our catchment-based water quality project in Lympstone on the Exe Estuary and our consultations with national specialists and other community groups. We believe the draft East Devon Local Plan is not sound or legally compliant. It has not considered a major body of evidence at national and local levels on water quality, does not follow national policy and guidance, and does not address local priorities.

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

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 is very weak on water quality, flood risk, and biodiversity. It demonstrates poor understanding of these issues, their interrelationship, and the need for an integrated water management strategy to adapt to climate change effectively (see <https://catchmentbasedapproach.org/wp-content/uploads/2018/09/Planning-Advice-Note.pdf>).

This is a fundamental flaw which makes the draft Local Plan unsound and noncompliant with national policy and planning requirements, as explained in my comments on the vision, spatial strategy, adaptation to climate change, development in towns and villages, and other chapters.

For example:

- The section on climate change adaptation only includes flood risk, not water quality and biodiversity.
- The appraisal of sites in Lympstone for climate change adaptation and water resources is incorrect, and is likely to be incorrect for other sites. Serious errors have been made, e.g., stating under water resources that 'development at the sites (in Lympstone) is unlikely to have any significant effects on water quality and quantity as none are located in a groundwater protection zone', when surface water runoff from these sites presents a major risk of water pollution and flooding. The surface water flows to a vulnerable brook (with low base flow) and then to the Exe Estuary, a 'European site', SPA, SSI, and Ramsar site. Lympstone is also recognised by the Environment Agency as a community at risk of flooding from a combination of surface, fluvial and tidal sources.

There is also no evidence in the 'Evidence Library' that water quality issues have been seriously considered.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: -