

Filtered Data Export

Full name: Devon Wildlife Trust

Organisation (where relevant): Devon Wildlife Trust

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

1(b). Does your comment relate to one of the changes listed above?: 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.: Thank you for the opportunity to comment on the Second Regulation 19 Publication Draft of the East Devon Local Plan. We confine our comments to those relating to nature and environment. Thank you for updating the Plan to reflect a number of the comments we submitted on 24 March 2025. These changes have strengthened the Local Plan and improved its overall clarity and effectiveness. However, it is disappointing to note that many of our previous comments have not been addressed in the current iteration of the Plan. As a wildlife-focused charity, the protection and enhancement of biodiversity is central to our work and expertise. The recommendations provided in our comments are evidence-based and directly aligned with biodiversity recovery, climate resilience and best practice in landscape planning. If included in the final iteration, they would substantially strengthen the Local Plan and significantly improve its ability to deliver meaningful and long-lasting environmental benefits. We therefore strongly urge the Council to give due consideration to our comments and to incorporate these recommendations into the Plan. Comments provided as part of our response to the first Regulation 19 Publication Draft are included in Appendix A. A significant proportion of our comments relate to the absence of a requirement for enhancement, in addition to protection, of the natural environment. The National Planning Policy Framework (NPPF) provides a clear statement that planning policies and decisions should 'contribute to and enhance the natural and local environment'. For the majority of planning applications, enhancement of biodiversity is simple and inexpensive. We strongly urge the Council to include the requirement for enhancement throughout its Local Plan. This would make a meaningful and lasting positive difference to both the people and wildlife of East Devon. Native Species The Local Plan currently contains only a single reference to the use of native species, relating to a hedgerow planted in association with the site allocated for development at 'Land opposite the Village Hall'. This isolated and site-

specific reference does not represent a coherent or adequate approach to landscape planting, biodiversity recovery or climate resilience. We would strongly welcome a clear policy commitment within the Local Plan to require the use of native and locally appropriate species for all landscape planting associated with new development. Wherever possible, these species should be locally sourced, from Devon and preferably East Devon, to ensure genetic suitability, improved establishment rates and long-term ecological resilience. To enable this, the Plan should also support the development of local tree nurseries and seed hubs. The Devon Nature Recovery Network (NRN) Habitat Suitability Mapping provides a high level of spatial and ecological detail and offers a robust evidence base for the creation of appropriate, site-specific species mixes. Embedding these commitments within the Local Plan would ensure that landscape planting contributes effectively to biodiversity recovery, climate adaptation and the delivery of a genuinely sustainable and resilient development strategy. Photographs Photos which are utilised throughout the document are an opportunity to demonstrate good practice. Relatively few pictures are utilised in the document and a number of these do not send the right message. Photographs should aim to show good integration of semi-natural habitats into developments, with a diversity of habitats included. Habitats such as woodland, wetlands and heathlands are part of the wider East Devon landscape and should be fully integrated within developments, providing space for wildlife, adding interest and place-making to developments, providing engagement and wellbeing opportunities with local communities and providing other ecosystems services. It would be good to start this process by including the right messaging within this document.

Full name: Devon Wildlife Trust

Organisation (where relevant): Devon Wildlife Trust

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.: 11.28

1(b). Does your comment relate to one of the changes listed above?: No

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.: ‘...in comparison the mean for all English district local authorities are 96.61% and 73.24% respectfully’. There is a typo here. ‘Respectfully’ should be replaced with ‘respectively’.

Full name: Devon Wildlife Trust

Organisation (where relevant): Devon Wildlife Trust

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

1(b). Does your comment relate to one of the changes listed above?: No

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.: 'Future Habitat bank in East Devon could offer the potential to deliver substantial biodiversity units'. There is a typo here. 'Bank' should be replaced with 'banks'

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1(b). Does your comment relate to one of the changes listed above?: Yes

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

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1(b). Does your comment relate to one of the changes listed above?: Yes

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 13.1

1(b). Does your comment relate to one of the changes listed above?: No

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

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.: Thank you for updating the Plan to reflect a number of the comments we submitted on 24 March 2025. These changes have strengthened the Local Plan and improved its overall clarity and effectiveness. However, it is disappointing to note that many of our previous comments have not been addressed in the current iteration of the Plan. As a wildlife-focused charity, the protection and enhancement of biodiversity is central to our work and expertise. The recommendations provided in our comments are evidence-based and directly aligned with biodiversity recovery, climate resilience and best practice in landscape planning. If included in the final iteration, they would substantially strengthen the Local Plan and significantly improve its ability to deliver meaningful and long-lasting environmental benefits. We therefore strongly urge the Council to give due consideration to our comments and to incorporate these recommendations into the Plan. Comments provided as part of our response to the first Regulation 19 Publication Draft are included in Appendix A. A significant proportion of our comments relate to the absence of a requirement for enhancement, in addition to protection, of the natural environment. The National Planning Policy Framework (NPPF) provides a clear statement that planning policies and decisions should 'contribute to and enhance the natural and local environment'. For the majority of planning applications, enhancement of biodiversity is simple and inexpensive. We strongly urge the Council to include the requirement for enhancement throughout its Local Plan. This would make a meaningful and lasting positive difference to both the people and wildlife of East Devon. Native Species The Local Plan currently contains only a single reference to the use of native species, relating to a hedgerow planted in association with the site allocated for development at 'Land opposite the Village Hall'. This isolated and site-specific reference does not represent a coherent or adequate approach to landscape planting, biodiversity recovery or climate resilience. We would strongly welcome a clear

policy commitment within the Local Plan to require the use of native and locally appropriate species for all landscape planting associated with new development. Wherever possible, these species should be locally sourced, from Devon and preferably East Devon, to ensure genetic suitability, improved establishment rates and long-term ecological resilience. To enable this, the Plan should also support the development of local tree nurseries and seed hubs. The Devon Nature Recovery Network (NRN) Habitat Suitability Mapping provides a high level of spatial and ecological detail and offers a robust evidence base for the creation of appropriate, site-specific species mixes. Embedding these commitments within the Local Plan would ensure that landscape planting contributes effectively to biodiversity recovery, climate adaptation and the delivery of a genuinely sustainable and resilient development strategy. Photographs Photos which are utilised throughout the document are an opportunity to demonstrate good practice. Relatively few pictures are utilised in the document and a number of these do not send the right message. Photographs should aim to show good integration of semi-natural habitats into developments, with a diversity of habitats included. Habitats such as woodland, wetlands and heathlands are part of the wider East Devon landscape and should be fully integrated within developments, providing space for wildlife, adding interest and place-making to developments, providing engagement and wellbeing opportunities with local communities and providing other ecosystems services. It would be good to start this process by including the right messaging within this document.

Full name: Devon Wildlife Trust

Organisation (where relevant): Devon Wildlife Trust

Other party name (if relevant):

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Proposal:

4. Development at the West End

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS13

1(b). Does your comment relate to one of the changes listed above?: No

1(c). If the comment is related to a site, please state the site reference here::

Brcl_27a

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.: ‘Onsite verification of the extent of the Coastal and Floodplain grazing marsh priority habitat and a design and layout which avoids this area’. We welcome the inclusion of ‘and, where possible, enhances it’, however we would like to see reference to the requirement for sufficient buffering from development. This will be essential to ensure that this priority habitat does not degrade as a result of directly adjacent anthropogenic influences, particularly through hydrological changes and runoff.

Full name: Devon Wildlife Trust

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Other party name (if relevant):

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Proposal:

4. Development at the West End

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

1(b). Does your comment relate to one of the changes listed above?: 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 park helps contribute to conservation and restoration of South East Devon European protected wildlife sites meeting conservation objectives by taking pressure of them and the delivery of the Three Rivers Landscape Recovery Project at Killerton’.
There is a typo here ‘of’ should be replaced with ‘off’.

Full name: Devon Wildlife Trust

Organisation (where relevant): Devon Wildlife Trust

Other party name (if relevant):

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Proposal:

4. Development at the West End

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS13

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Brcl_27a

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

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

‘Onsite verification of the extent of the Coastal and Floodplain grazing marsh priority habitat and a design and layout which avoids this area’. We welcome the inclusion of ‘and, where possible, enhances it’, however we would like to see reference to the requirement for sufficient buffering from development. This will be essential to ensure that this priority habitat does not degrade as a result of directly adjacent anthropogenic influences, particularly through hydrological changes and runoff.

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Organisation (where relevant): Devon Wildlife Trust

Other party name (if relevant):

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Proposal:

4. Development at the West End

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

1(b). Does your comment relate to one of the changes listed above?: 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 park helps contribute to conservation and restoration of South East Devon European protected wildlife sites meeting conservation objectives by taking pressure of them and the delivery of the Three Rivers Landscape Recovery Project at Killerton'. There is a typo here 'of' should be replaced with 'off'.

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Organisation (where relevant): Devon Wildlife Trust

Other party name (if relevant):

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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.: SD01

1(b). Does your comment relate to one of the changes listed above?: No

1(c). If the comment is related to a site, please state the site reference here.:

Exmo_20

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

Devon Wildlife Trust considers the inclusion of this site for development is unacceptable and we object in the strongest possible terms. We consider that the proposed allocation is unsuitable for development both due to the location of the area within the wider ecological landscape and the habitat composition of the site itself. We note that the site was originally scoped out of being allocated in the Site Selection Report (August 2024) for a number of reasons, most significantly 'there are significant local levels of biodiversity interest at the site that could be adversely affected by development. The site promoter for a southern part of the site shows highway access to the south of the site coming through a length of Unconfirmed County Wildlife Site, which would clearly cause damage.' Proximity to Designated Sites The proposed Exmo_20 allocation lies directly adjacent to the southern extent of a number of sites which have been designated at the highest level. Exmo_20 lies within 10 metres of Pebblebed Heaths National Nature Reserve (NNR), East Devon Pebblebed Heaths Special Area of Conservation (SAC), East Devon Heaths Special Protection Area (SPA) and East Devon Pebblebed Heaths Site of Special Scientific Interest (SSSI). Devon Wildlife Trust Bystock Nature Reserve also lies within these designations. These sites include a strong element of public access. The proposed allocation lies within East Devon Pebblebed Heaths SSSI Impact Risk Zone (IRZ). Development of land situated within IRZs has potential to have a harmful effect on terrestrial SSSIs and the SACs that they underpin. Natural England consider residential development of 50 units or more likely to have an impact on the East Devon Pebblebed Heaths SSSI. It is understood the

proposed allocation is for up to 700 dwellings. Natural England SSSI condition assessments have been undertaken to determine the condition of East Devon Pebblebed Heaths SSSI, with several parcels which are considered 'unfavourable recovering' and 'unfavourable declining'. Habitats are therefore clearly in a vulnerable condition, and this is likely to be significantly exacerbated by the development of Exmo_20. The entirety of the proposed Exmo_20 allocation lies within a Strategic Nature Area (SNA). This area has been identified for its nationally important habitats and woodlands and diversity of species including birds, insects, mammals and amphibians. SNAs are a key part of Devon's Nature Recovery Strategy; these areas should be targeted for enhancement and it is not appropriate to consider allocation of this land at scale for development. The proximity of the European sites (SPA and SAC) to the proposed allocation raises considerations under the requirements of the Habitats Directive 1992 for these sites to be maintained or, where necessary, restored at a favourable conservation status (Article 3 (1)). Natural England has a clear presumption against any net increase in residential development within 400m of a heathland SAC. There is a substantial evidence base which demonstrates that urban development in the area around lowland heathland has an adverse effect on the quality of heathland interest features which underlie the designation of the European sites and SSSIs. Key references can be found at:

https://webarchive.nationalarchives.gov.uk/ukgwa/20140605111944/http://www.naturalengland.org.uk/regions/south_west/ourwork/heathlands/default.aspx The current East Devon Local Plan states 'To help preserve the integrity of the East Devon Pebblebed Heaths, specifically on account of the impacts of domestic cats through bird predation, new dwellings will not be allowed on or within 400 meters of the Pebblebed Heaths.' The current Second Regulation 19 Draft includes a policy which states 'To help preserve the integrity of the East Devon Pebblebed Heaths, specifically on account of these potential impacts, new dwellings and tourist accommodation or other developments that may result in unacceptable impacts will not be permitted on or within 400 metres of the Pebblebed Heaths'. It is beyond the scope of this letter to detail the range and diversity of sensitive habitats and species which are supported by the NNR/SAC/SPA/SSSI designations, which would be exposed to significant detrimental effects were the site to be subject to development. These include, but are not limited to: Disruption to the hydrology of heathland wetland through both drainage interception and enriched urban water discharges. ? Increased air pollution. ? Increased likelihood of arson/accidental fire. ? Damage to habitat and disturbance to wildlife caused by increased use of heathland for off road cycle and motorcycling. ? Increased recreational use, especially by dog walkers, leading to disturbance of ground nesting birds and habitat damage. ? Habitat change from heath to grassland through enrichment by dog faeces. ? Predation by domestic cats on reptiles and ground nesting birds. ? Presence of higher numbers of people and greater recreational use leading to more difficulties in managing the heaths effectively for their designated interests. ? Increased fly tipping of garden and other

waste. It is important to note that many of these urban effects can operate synergistically to exacerbate the adverse impacts on designated interest features. Due to the proximity of the proposed allocation to the SAC, it is incumbent on the local planning authority to undertake an Appropriate Assessment (AA) prior to adopting the Local Plan. It is unlikely that given the scale and proximity of the proposed Exmo_20 allocation to the SAC, that an AA could conclude that there would be no adverse effects on the integrity of the SAC, regardless of the over-arching strategic approach of the South-East Devon European Sites Mitigation Strategy (SEDESMS). Therefore, the authority would need to progress through the derogation process and seek permission from the Secretary of State demonstrating no suitable alternatives and proposing suitable compensatory measures. Devon Wildlife Trust would urge East Devon District Council to remove this allocation from the plan to avoid such impacts altogether.

Habitats/species within the Exmo_20 allocation boundary The proposed allocation includes a number of areas of high ecological value. Several blocks of woodland are present, a number of which have been highlighted as Unconfirmed Wildlife Sites. These are areas which have been identified as potentially high value habitats, but for which access has not yet been obtained to allow detailed survey. These areas are identified by comprehensive assessment of aerial photography and are therefore likely to support habitat of high value for wildlife. A number of areas within Exmo_20 are listed in the Priority Habitat Inventory, which includes designated areas of ancient and deciduous woodland and other assigned habitats of importance. The allocation site currently serves an important function of acting as a buffer between the urban area of Exmouth and the highly designated land to the north. Development within the proposed allocation would result in degradation and loss of ecologically supportive environments outside the designated site boundaries. For example, nightjar travel away from heaths to feed and therefore development of habitat directly adjacent to heathland has the potential to negatively impact this species associated with primary designation habitats of the European sites. It is deeply concerning to hear that at the time of our comments dated 6 November 2024, enabling works appeared to have commenced on site, with tree felling to create access underway. We urge the LPA to ensure that such works are halted, with compensation measures undertaken to address any biodiversity loss which has occurred. We hope that the information presented above explains why the area encompassed within proposed allocation Exmo_20 is wholly unsuitable for development. We do not believe that it is feasible to develop this site without causing significant adverse effects on the integrity of the SAC. We strongly urge East Devon District Council not to include this proposed allocation within its Local Plan. Revised text in the Second Regulation 19 Draft We note that the LPA has sought to address the significant concerns regarding this allocation with the provision of revised text within the Second Regulation 19 Draft. The revisions provided do not sufficiently address the points outlined above. Notwithstanding our strong objection to the inclusion of this allocation within the Local Plan, the following comments are provided: 'Street lighting

should be avoided, and new planting should provide screening'. As per our comments above, this should be rephrased to stipulate the requirement for native planting. Native planting is particularly important in this area due to the sensitive location of the site in proximity to European designated sites. 'A natural buffer should be retained in the north-east of the site, along the B3179, to conserve foraging areas for nightjars opportunities for BNG and to maintain visual amenity adjacent to the East Devon National Landscape'. The inclusion of BNG in this sentence is confusing. Rewording is required. Additionality also needs to be considered here. 'Any car parking near to the SAC/SPA should be for uses that do not support recreational access to the SAC/SPA'. This statement is not feasible. Any parking provision in proximity to the SAC/SPA is likely to be utilised for recreational access into the SAC/SPA, regardless of what the parking is intended for. A clear statement restricting the development of parking areas within 400m of the SAC/SPA is required.

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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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1(b). Does your comment relate to one of the changes listed above?: Yes

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Exmo_20

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

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Devon Wildlife Trust considers the inclusion of this site for development is unacceptable and we object in the strongest possible terms. We consider that the proposed allocation is unsuitable for development both due to the location of the area within the wider ecological landscape and the habitat composition of the site itself. We note that the site was originally scoped out of being allocated in the Site Selection Report (August 2024) for a number of reasons, most significantly 'there are significant local levels of biodiversity interest at the site that could be adversely affected by development. The site promoter for a southern part of the site shows highway access to the south of the site coming through a length of Unconfirmed County Wildlife Site, which would clearly cause damage.' Proximity to Designated Sites The proposed Exmo_20 allocation lies directly adjacent to the southern extent of a number of sites which have been designated at the highest level. Exmo_20 lies within 10 metres of Pebblebed Heaths National Nature Reserve (NNR), East Devon Pebblebed Heaths Special Area of Conservation (SAC), East Devon Heaths Special Protection Area (SPA) and East Devon Pebblebed Heaths Site of Special Scientific Interest (SSSI). Devon Wildlife Trust Bystock Nature Reserve also lies within these designations. These sites include a strong element of public access. The proposed allocation lies within East Devon Pebblebed Heaths SSSI Impact Risk Zone (IRZ). Development of land situated within IRZs has potential to have a harmful effect on terrestrial SSSIs and the SACs that

they underpin. Natural England consider residential development of 50 units or more likely to have an impact on the East Devon Pebblebed Heaths SSSI. It is understood the proposed allocation is for up to 700 dwellings. Natural England SSSI condition assessments have been undertaken to determine the condition of East Devon Pebblebed Heaths SSSI, with several parcels which are considered 'unfavourable recovering' and 'unfavourable declining'. Habitats are therefore clearly in a vulnerable condition, and this is likely to be significantly exacerbated by the development of Exmo_20. The entirety of the proposed Exmo_20 allocation lies within a Strategic Nature Area (SNA). This area has been identified for its nationally important habitats and woodlands and diversity of species including birds, insects, mammals and amphibians. SNAs are a key part of Devon's Nature Recovery Strategy; these areas should be targeted for enhancement and it is not appropriate to consider allocation of this land at scale for development. The proximity of the European sites (SPA and SAC) to the proposed allocation raises considerations under the requirements of the Habitats Directive 1992 for these sites to be maintained or, where necessary, restored at a favourable conservation status (Article 3 (1)). Natural England has a clear presumption against any net increase in residential development within 400m of a heathland SAC. There is a substantial evidence base which demonstrates that urban development in the area around lowland heathland has an adverse effect on the quality of heathland interest features which underlie the designation of the European sites and SSSIs. Key references can be found at:

https://webarchive.nationalarchives.gov.uk/ukgwa/20140605111944/http://www.naturalengland.org.uk/regions/south_west/ourwork/heathlands/default.aspx The current East Devon Local Plan states 'To help preserve the integrity of the East Devon Pebblebed Heaths, specifically on account of the impacts of domestic cats through bird predation, new dwellings will not be allowed on or within 400 meters of the Pebblebed Heaths.' The current Second Regulation 19 Draft includes a policy which states 'To help preserve the integrity of the East Devon Pebblebed Heaths, specifically on account of these potential impacts, new dwellings and tourist accommodation or other developments that may result in unacceptable impacts will not be permitted on or within 400 metres of the Pebblebed Heaths'. It is beyond the scope of this letter to detail the range and diversity of sensitive habitats and species which are supported by the NNR/SAC/SPA/SSSI designations, which would be exposed to significant detrimental effects were the site to be subject to development. These include, but are not limited to: ? Disruption to the hydrology of heathland wetland through both drainage interception and enriched urban water discharges. ? Increased air pollution. ? Increased likelihood of arson/accidental fire. ? Damage to habitat and disturbance to wildlife caused by increased use of heathland for off road cycle and motorcycling. ? Increased recreational use, especially by dog walkers, leading to disturbance of ground nesting birds and habitat damage. ? Habitat change from heath to grassland through enrichment by dog faeces. ? Predation by domestic cats on reptiles and ground nesting birds. ? Presence of higher numbers of

people and greater recreational use leading to more difficulties in managing the heaths effectively for their designated interests. ? Increased fly tipping of garden and other waste. It is important to note that many of these urban effects can operate synergistically to exacerbate the adverse impacts on designated interest features. Due to the proximity of the proposed allocation to the SAC, it is incumbent on the local planning authority to undertake an Appropriate Assessment (AA) prior to adopting the Local Plan. It is unlikely that given the scale and proximity of the proposed Exmo_20 allocation to the SAC, that an AA could conclude that there would be no adverse effects on the integrity of the SAC, regardless of the over-arching strategic approach of the South-East Devon European Sites Mitigation Strategy (SEDESMS). Therefore, the authority would need to progress through the derogation process and seek permission from the Secretary of State demonstrating no suitable alternatives and proposing suitable compensatory measures. Devon Wildlife Trust would urge East Devon District Council to remove this allocation from the plan to avoid such impacts altogether.

Habitats/species within the Exmo_20 allocation boundary The proposed allocation includes a number of areas of high ecological value. Several blocks of woodland are present, a number of which have been highlighted as Unconfirmed Wildlife Sites. These are areas which have been identified as potentially high value habitats, but for which access has not yet been obtained to allow detailed survey. These areas are identified by comprehensive assessment of aerial photography and are therefore likely to support habitat of high value for wildlife. A number of areas within Exmo_20 are listed in the Priority Habitat Inventory, which includes designated areas of ancient and deciduous woodland and other assigned habitats of importance. The allocation site currently serves an important function of acting as a buffer between the urban area of Exmouth and the highly designated land to the north. Development within the proposed allocation would result in degradation and loss of ecologically supportive environments outside the designated site boundaries. For example, nightjar travel away from heaths to feed and therefore development of habitat directly adjacent to heathland has the potential to negatively impact this species associated with primary designation habitats of the European sites. It is deeply concerning to hear that at the time of our comments dated 6 November 2024, enabling works appeared to have commenced on site, with tree felling to create access underway. We urge the LPA to ensure that such works are halted, with compensation measures undertaken to address any biodiversity loss which has occurred. We hope that the information presented above explains why the area encompassed within proposed allocation Exmo_20 is wholly unsuitable for development. We do not believe that it is feasible to develop this site without causing significant adverse effects on the integrity of the SAC. We strongly urge East Devon District Council not to include this proposed allocation within its Local Plan. Revised text in the Second Regulation 19 Draft We note that the LPA has sought to address the significant concerns regarding this allocation with the provision of revised text within the Second Regulation 19 Draft. The revisions provided do not sufficiently address the

points outlined above. Notwithstanding our strong objection to the inclusion of this allocation within the Local Plan, the following comments are provided: 'Street lighting should be avoided, and new planting should provide screening'. As per our comments above, this should be rephrased to stipulate the requirement for native planting. Native planting is particularly important in this area due to the sensitive location of the site in proximity to European designated sites. 'A natural buffer should be retained in the north-east of the site, along the B3179, to conserve foraging areas for nightjars opportunities for BNG and to maintain visual amenity adjacent to the East Devon National Landscape'. The inclusion of BNG in this sentence is confusing. Rewording is required. Additionality also needs to be considered here. 'Any car parking near to the SAC/SPA should be for uses that do not support recreational access to the SAC/SPA'. This statement is not feasible. Any parking provision in proximity to the SAC/SPA is likely to be utilised for recreational access into the SAC/SPA, regardless of what the parking is intended for. A clear statement restricting the development of parking areas within 400m of the SAC/SPA is required.

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Organisation (where relevant): Devon Wildlife Trust

Other party name (if relevant):

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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.: SE02

1(b). Does your comment relate to one of the changes listed above?: Yes

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.: 'It is well integrated with its surroundings and closely related to existing buildings, being of appropriate location, scale, design and materials so as not to harm the character, biodiversity and landscape of the rural area particularly within the NLS'. Whilst we welcome a statement which protects biodiversity from harm, as above this does not reflect the requirement of the NPPF. This sentence should be reworded to include the requirement to enhance biodiversity.