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5.1

Full name: Robert Jones

Organisation (where relevant): River Otter Fisheries Association

Proposal:

5. Development in the Towns and Villages

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

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

5.1

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

CHAPTER 5 – DEVELOPMENT IN TOWNS AND VILLAGES

Of the @1,600 house proposed in the Otter Valley under the plan 840 of these will be in Honiton plus @ 30 acres of commercial development and @ 480 in Ottery St Mary where there has been no mention made in the plan or in the IDP of any infrastructure improvement to clean water supply or foul water treatment.

Full name: Alan Williams

Organisation (where relevant): Grass Roots Planning

Other party name (if relevant): South West Strategic Developments Ltd

Proposal:

5. Development in the Towns and Villages

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

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

5.1

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

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

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

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

5.1

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. At the Strategic Planning Committee (SPC) meeting on the 1st November 2022 a total of 17 sites had NEW 'a' and 'b' site references added for inclusion in the Reg 18 Consultation process. None of these NEW sites were discussed/approved at this meeting, they were only introduced as part of the report pack for this meeting within the site maps, and no reason was provided for the introduction of these new sites (I have attached details of these sites as evidence below). There was a resolution passed at this meeting on the 1st November 2022 as follows 'Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content;'. I have received written confirmation from the current Chair of the SPC stating that 'Neither Mr Freeman nor Mr Dickins nor myself have any authority to unilaterally remove (or, indeed, add) sites from the plan', (see attached evidence for this submission). The inclusion of 34 NEW sites cannot be seen as 'minor'!!! None of these 'a' and 'b' sites are mentioned in the HELAA, Sustainability Appraisal Report or in the 'Sites Additional Information' documents. These reports and documents form the KEY evidence to support the Draft Local Plan for the Reg 18 consultation. The breakdown of the original site references into two parts completely changes the descriptions for each individual part of the site, and should have been discussed in detail and correctly assessed and agreed by the SPC. A change of this magnitude should have been identified somewhere, but there is no evidence in the meeting notes or YouTube videos that this ever took place.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

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

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

5.1

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. At the Strategic Planning Committee (SPC) meeting on the 1st November 2022 a total of 17 sites had NEW 'a' and 'b' site references added for inclusion in the Reg 18 Consultation process. None of these NEW sites were discussed/approved at this meeting, they were only introduced as part of the report pack for this meeting within the site maps, and no reason was provided for the introduction of these new sites (I have attached details of these sites as evidence below). There was a resolution passed at this meeting on the 1st November 2022 as follows 'Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content;'. I have received written confirmation from the current Chair of the SPC stating that 'Neither Mr Freeman nor Mr Dickins nor myself have any authority to unilaterally remove (or, indeed, add) sites from the plan', (see attached evidence for this submission). The inclusion of 34 NEW sites cannot be seen as 'minor'!!! None of these 'a' and 'b' sites are mentioned in the HELAA, Sustainability Appraisal Report or in the 'Sites Additional Information' documents. These reports and documents form the KEY evidence to support the Draft Local Plan for the Reg 18 consultation. The breakdown of the original site references into two parts completely changes the descriptions for each individual part of the site, and should have been discussed in detail and correctly assessed and agreed by the SPC. A change of this magnitude should have been identified somewhere, but there is no evidence in the meeting notes or YouTube videos that this ever took place.

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

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

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

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

5.1

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution.

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

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

Full name: Lisa Turner

Organisation (where relevant): Blackdown Hills National Landscape

Proposal:

5. Development in the Towns and Villages

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

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

5.1

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We consider that the overall approach to allocations does not adequately address your duty to seek to further the conservation and enhancement of the National Landscape. As such it is not justified, effective or consistent with national policy. These comments apply to the main plan document and to Topic Paper SAL – 048 Major Development in National Landscapes.

We have identified the following shortcomings:

1. Strategically, what alternatives have been considered? Of the overall housing and employment numbers, the number in or adjacent to the National Landscapes is relatively small, and of those some will be within settlements or otherwise acceptable (some examples are given of large sites where the bulk of development is some distance from the protected landscapes). However, in terms of conserving the integrity of the protected landscapes, the impact is considerable, and might alternatives such as fewer allocations in locations such as Honiton and more allocations at Cranbrook/West End be an appropriate measure?

Whilst noting the local plan strategy/settlement hierarchy, we suggest there is still a need to reflect on that in the context of the NPPF – paragraph 182 (Dec 2023), which is clear that ‘the scale and extent of development within all these designated areas should

be limited’ and also recognises that ‘development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas’.

2. The site assessment process was not applied from the outset of plan preparation, i.e. it was applied retrospectively to many sites rather than taking a landscape-led approach to informing site choices.

3. A consistent process, including consideration of natural beauty factors, to identify whether a site could be deemed major in a protected landscape context is a positive approach, but is not the same as actively determining whether that development at that location would serve to seek to further the purpose. For this, a more detailed consideration of the site allocation in relation to special qualities would be required.

Issues and impacts on the conservation and enhancement of natural beauty to consider include;

- The effects of the introduction of built form and associated infrastructure
- Topography – steep slopes likely to require significant earthworks/ retaining structures
- Impact of light spill from street lighting or windows on areas noted for dark skies
- Impact on tranquillity through increased levels of site activity and increased traffic movement on surrounding roads
- Whether major road alterations be needed, or the more insidious erosion of local distinctiveness (e.g. visibility splays, highway infrastructure)
- Loss of trees/ hedgerow/other noteworthy habitats
- Impact on watercourses/ waterbodies
- Construction phase impacts including potential off site impacts, e.g large delivery vehicles or construction plant accessing narrow winding lanes.

4. The site assessment tables (landscape and scenic quality) focus on the site, however the site should be considered in context as part of a wider landscape of special qualities; for example one individual field may not demonstrate outstanding qualities in itself, but it is an element of a field patterned patchwork landscape, all unspoilt and undeveloped, which is a valued quality. It may also be part of a vista viewed from afar, another special quality, which would be adversely impacted by development.

5. The site assessment tables demonstrate a lack of appreciation and sensitivity to natural beauty and special qualities, illustrated by a simple example; for nature of development, each housing site includes 'Housing –predominantly two storey (8.5m to ridge), possibly some 2.5 storey (9m to ridge) and 3 storey (10.8m to ridge) where appropriate'. There is simply no historical precedent for 2.5/3 storey dwellings in the Blackdown Hills, and even the modern 8.5 metres house is taller than many traditional cottages. Such buildings would not conserve and enhance natural beauty and should be avoided.

6. Some of the sites are very late introductions into the local plan (Honi_12 and Honi_18 for example), which has not allowed for full public consideration and scrutiny.

7. Some of the allocated sites, e.g. Honi_07, Honi_12, Honi_13 and Brhe_09, are noted as having heritage and landscape sensitivities. It is questionable therefore as to why these are being pursued, and does allocation of these (and others) in or adjacent to the National Landscape(s) really seek to further the purpose?

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.: Ultimately, reconsideration/removal of some sites that are in or adjacent to the National Landscapes would address the above concerns.

Greater consideration of impacts and implications of policies and allocations in relation to seeking to further the purpose of the National Landscapes.

At the very least, further guidance/parameters/requirements should be set out for each allocated site, and paragraph 5.2 (and elsewhere) should provide better signposting to key policies elsewhere in the plan, noting where design, etc is particularly key to the acceptability of future proposals.

Full name: Kerry Kennell

Organisation (where relevant): Upottery Parish Council

Proposal:

5. Development in the Towns and Villages

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

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

5.1

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

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

Upottery Parish Council Response to Regulation 19 Consultation on East Devon District Council Local Plan 2020-2040

Thank you for the invitation to respond to the Regulation 19 consultation on the draft EDDC Local Plan. We recognise that the consultation response is restricted to specific aspects. We have previously made representations in writing and at Planning Committee meetings regarding the process by which the plan was developed, and in particular the application of the spatial strategy to Upottery.

The Parish Council's position is that we see a need for modest, sustainable growth in housing of up to 20 new homes over the period of the Local Plan. Upottery has, however, been classified as an 'unsustainable' settlement and therefore the Plan makes no provision for such growth. We have previously stated our concerns about the process involved in coming to this conclusion, which attaches significance to outdated facilities such as libraries while ignoring modern amenities such as superfast broadband; as a result we feel our thriving and vibrant community with a busy pub and popular school has been judged unfairly. The binary choice between 'unsustainable' and 'sustainable' seems to equate to a dilemma between being foisted with the possibility of large developments and the denial of the modest growth our community needs. Judging all settlements against a single comparatively simple scale does not reflect the diversity and qualities of communities in this area.

For these reasons, we are raising a question over the soundness of the plan, in that by failing to meet our Parish's housing needs it is not positively prepared, and in that we do not think the process of determining the status of settlements is sound, that it is not fully justified.

Full name: Mr Simon Croft

Organisation (where relevant): South West Water

Proposal:

5. Development in the Towns and Villages

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

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

5.1

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

The Site Allocations proposed within the chapters Development in Towns and Villages and Development at the West End of the proposed Local Plan have been modelled by SWW and have provided within its previous consultation response an assessment on initially identified reinforcement works necessary to accommodate each site identified. Further assessment will be required in due course as developments progress and details become available for evaluation.

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)

5.5

Full name: Jonathan Milsom

Proposal:

5. Development in the Towns and Villages

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

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

5.5

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development (Honi_18) to add 136 houses to the rear of King's Road in Honiton does not appear to be sound. The selection of this site does not appear to have had the correct level of positive preparedness (using the taxonomy of the commentary process) due to the introduction of another busy access point to the A35 that will add a traffic choke point and increase the likelihood Road Traffic Collisions (RTCs).

The proposed estate would require access to 136 houses from the very busy A35 main trunk road between Honiton and Axminster. This road already has a very high level of largely through town traffic flow with heavy lorries, vans, commuter and seasonal tourist car traffic that need to pass through Honiton as there is no other alternative to join the A30 from the South Coast.

Access to the estate would either need to be opposite the existing Waterleat Road junction (which already often has long queues to join or exit from) to the existing farm track entrance or at a new access above it between Waterleat Road and 2 houses located approximately 150m away. Due to the route of the A35 any new entrance to the housing estate would be obscured to traffic coming downhill on the A35 until they pass the 2 houses.

The A35 is a 60mph road with tight bend (that does slow the traffic to some extent as it enters Honiton) but the addition of a new junction below the 2 houses above with the addition of more traffic trying to access / leave the A35 at peak commuter time is likely to become a further choke point on the roads around Honiton and increase the likelihood of RTCs.

I understand that there is a need to build more houses in the UK and that Honiton need to contribute to that but of all the sites proposed for development around Honiton, Honi_18 seems to offer the most downsides due to its proximity to the A35. The increased congestion and risk of RTCs will have an impact on all users of that road.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Access to this estate from the A35 comes with considerable additional risk of RTCs and further congestion.

To make this proposal sound then the route of the A35 will need to be changed so that the any proposed entrance to the Honi_18 will be visible to traffic entering Honiton from the Axminster direction. A further option would be to consider a complete re-route of the A35 to avoid the need for through traffic to use the roundabout at the junction of the A35 (Monkton Rd and King's Rd) and A375 (High St).

The other option would be to use Hale Lane as an entrance to the estate. This again would add further traffic volume joining the A35 at another busy junction.

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

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

5.6

Full name: William John Pope

Proposal:

5. Development in the Towns and Villages

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

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

5.6

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Because implementation is extremely likely to result in damage by flooding to existing properties I believe that implementation would be effectively criminal damage

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Don't build on GH/ED/27 & Otry-10 because to do so would be likely to put buildings and even life at risk

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
These areas are unsuitable due to position and slope which would result in a high chance of flood risk

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

relevant policy or paragraph. Please be as precise as possible.: Exclude GH/ED/27 & Otery-10 from list of proposed development site as they are unsuitable.

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

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

5.8

Full name: Sarah Bevan

Proposal:

5. Development in the Towns and Villages

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

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

5.8

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

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

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.: na

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

3(b). If no, please give details 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 proposal to recommend Sidm-31 is completely unsound. This was correctly rejected in the current adopted plan and nothing has fundamentally changed.

By your own admission it was correctly rejected again this time round but added almost half heartedly because of representations by the current owner/developer. It is in the AONB designated area (now called National Landscape) and outside the current built up area boundary. It should remain so to protect the landscape and countryside from unnecessary development. It is by your own admission within the proposed green wedge (currently within the 'Sidbury-Sidford Non-Coalescence Area' in the 'made' Sid Valley Neighbourhood Plan).

The landscape value is Very High and with High/Medium landscape sensitivity. It is incorrect to say that access is good It is not. Burscombe Lane is a narrow country lane past the site with no ability even for cars and pedestrians to pass on the Lane, and then has a very narrow section with no footpath which is not wide enough for even medium sized commercial vehicles. These have to stop beforehand and unload into smaller farm vehicles to get past the narrowest part.

The Sidmouth site selection report says a possible second access site could be into Windsor Mead. However there is no current access and it would require the loss of gardens from 2 houses. In any event Windsor Mede is itself a reasonably narrow road with very poor access onto the main coast road, having very poor visibility to both right and left which cannot be improved because of the hight of the land on each side of the junction.

In addition there can be no justification to extend the built up area boundary and build further into the National Landscape when there are other infill sites in Sidmouth within the built up area boundary.

For example the main reason for rejection of site Sidm-22 was that part of the site was currently used for Employment purposes. However the north part of the site is not built on and only sparsely used for storage. combined with part of Sidm_20 this area could be developed for housing with good access onto the main road and with far less restriction on the height and type of housing.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To make it sound it needs all reference to Sidm-31 being removed from the paragraph 5.8. The reasons being set out at 3(b) above

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please

be as precise as possible.: the Site selection report admits the site has not been through the Housing and Economic Land Availability (HELAA) process and therefore does not have proper and adequate comments from DCC Highways or DCC Education. Furthermore I cannot see that it has been adequately and fully consulted with 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)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure a proper review of the site has been undertaken

Full name: Anthony Bevan

Proposal:

5. Development in the Towns and Villages

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

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

5.8

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This area is part of the ED AONB and it cannot be right to destroy this environment by when other unused land that is not part of the AONB is available. It would also be unacceptable to build on this land which is prominent in the local landscape

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.: Delete all reference to this proposal

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: For the reasons given at 2 (b) above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Delete all reference to this para. If there is a need for the provision of 15 houses in the plan then find another area which is not part of the AONB such as the field between Bickwell valley and Boughmore Rd.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: because it does not comply with the need for 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)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because we need to ensure the protection of the AONB

5.11

Full name: Terry Sneller

Organisation (where relevant): Dorset Council

Proposal:

5. Development in the Towns and Villages

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

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

5.11

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

Dorset Council feel that there could be greater recognition of the presence of Lyme Regis and the relationship between the town and Uplyme. Recognising those settlements adjacent to East Devon and planning in this context would aid in achieving some of the objectives of the plan. For example, Objective 9 Promoting Sustainable Transport could be realised for development in Uplyme by acknowledging the services and facilities that exist in Lyme Regis and the opportunities for improving access to these facilities by sustainable transport modes. Recognising the existence of Lyme Regis would also demonstrate that the Uplyme / Lyme Regis community that straddles the Dorset / Devon border, is relatively self-contained. In the context of the Spatial Strategy, the combined population of Lyme Regis and Uplyme is around 5,000 and therefore the settlement is larger than many of the Tier 3 Local Centres and closer in size to those in Tier 2. As such, it may be appropriate to consider opportunities for meeting housing need in this location. However, Dorset Council do acknowledge the highly constrained nature of the area that severely limits opportunities for development. Recognition of the role of Uplyme within the settlement hierarchy reflecting the local facilities that exist, is supported. The village could therefore be considered as an appropriate location to meet local needs especially when considered alongside Lyme Regis.

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Church Commissioners

Proposal:

5. Development in the Towns and Villages

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.: Please see accompanying Letter. We would like to attend any hearing sessions regarding housing/supply and those with respect to the policies we have objected to within our accompanying representations.

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Church Commissioners

Proposal:

5. Development in the Towns and Villages

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.: Please see accompanying Letter. We would like to attend all hearing sessions relating to housing need/supply and the policies that we have objected to in our accompanying representations.

SD01

Full name: Ben Ingham

Organisation (where relevant): EDDC

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The selection process was flawed: Officers insisted Lymp 07 should be a primary option for selection for housing allocation although it is in a green wedge and coastal protection area. When you look at this allocation on a map of Exmouth, it is not directly adjacent to current housing and looks innocuous. But they were adamant. At committee it was the first of the allocations to be selected, with emphasis on hitting housing targets. This was selected but others not in landscape designations were not even considered.

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.: EDDC should: Consider the four large sites within ED first THEN consider housing allocations adjacent to higher tier communities.

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

3(b). If no, please give details 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 method deployed by officers failed to allow councillors to identify the big allocations. They were ONLY considered when the final housing number had been achieved and were therefore rejected. That is ethically wrong and drives development in the wrong

locations. At best, this is the lazy way to do things. Any other motivation I do not understand.

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.: Reject the eEDLP

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No. Local opinion was ignored and not taken into account. Lymp 07 was previously dismissed at an appeal public enquiry. The inspector identified the weight of public opinion as being important to his decision.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be available to the inspector for any clarification

Full name: Andrew McKeon

Organisation (where relevant): EXETER CIVIC SOCIETY

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

Exeter Civic Society objects to the proposed allocation of land for a new community in East Devon and at Exmouth and Topsham on the grounds that the implications for the road network and infrastructure development have not been properly considered and the plan is therefore unsound in respect of these proposals. We are making this objection because of the levels of the current levels of congestion on roads in Exeter at peak times, and the increasing number of vehicles on the Strategic Road Network around the city. In addition, it is clear from current traffic movements that there is already a significant increase in traffic leaving and returning to the city at peak times to workplaces outside of the city; possibly at Skypark, Hill Barton and Greendale Industrial Parks. We expect this trend to continue. It is unsound because: The assessment of transport impacts was modelled on a previous draft plan. The updated modelling in December 2024 noted that the final plan may be different. It is indeed, with increases of 25% for the new town albeit over a longer timescale and of 30% for Exmouth. These will have a significant impact and should be modelled and considered before the plan is finalised and considered sound. The updated December 2024 modelling notes: 'In 2040 many of the junctions in Exeter show an increased V/C ratio due to higher traffic flows on the network. There are some junctions which were already over-capacity in 2017 and/or 2030 and remain so in the future years, but others which were below capacity and now have at least one turn that is over-capacity. For example, several SRN junctions between the A30 airport junction, M5 J29 and M5 J30 had worst turn V/C ratios below 95% in 2030 that go over 95% in 2040. Junctions that were already over-capacity in 2030 and get worse in 2040 include Clyst St Mary roundabout, Clyst St George roundabout, and the A38 northbound approach to M5 J31.' The further housing development

proposed will exacerbate this but no assessment has been made. Prime access to the North of Topsham site will be along Clyst Road. This is a narrow road with a traffic light controlled junction to the A376 near to J30 of the M5. The plan suggests making a cycle route and/or a bus route along it but the feasibility and cost of doing so needs to be assessed first before the allocation can be made as local knowledge suggests the likelihood of doing so is negligible. Strategic Policy WS10 proposes that EDDC and Exeter City Council will work jointly on infrastructure and traffic mitigation matters, specifically in relation to the M5 J 30 roundabout. It is not clear whether this includes the Clyst Road/A376 junction, but that should specifically be referenced and included in the policy. Also, there is no reference to changes to the junction in the Infrastructure Delivery Plan. They need to be included as Priority 1. The A376 from Exmouth to Exeter is known to be heavily congested at peak times - a point made by Devon County Council in earlier consultations. This has been omitted from the S19 version of the plan but is even more relevant given the extra housing proposed. There is little practical prospect of a bus priority route, given the nature of the A376 from the town to the M5 and Exeter, passing through many villages including the congested roads within Topsham. There are no proposals to improve the railway line other than enhancements to specific stations. Devon County Council's November 2020 Exeter Transport Strategy is now over five years old and is half way through. It cannot be considered reliable evidence at this point without updating and going further to 2035 or beyond. A number of the schemes listed as completed by March 2025 have been significantly reduced in scope because of public objections, so their likely impact is much reduced. Given the track record in significantly modifying and reducing the impact of such schemes in light of public opinion, the proposed future schemes and their mitigating effect need to be reassessed for the plan to be sound. The November 2020 Transport Strategy notes that much of the impact of additional traffic in and on Exeter has been effectively absorbed by Exeter residents changing their travel habits (Para 3.3). There is diminishing scope for this. 80% of commuting journeys from towns outside Exeter are by car, from rural areas it is 90%. It also notes that 'existing (i.e. 2020) transport networks [are] already at capacity in peak periods' (Para 3.20). It notes but makes no specific assessment of the impact of Cranbrook, other than that it will grow to the size of Tiverton, and its highways will become congested. Better quantification of travel habits and impact of Cranbrook residents would better inform the S19 Plan and its soundness. The proposed new town (and to a lesser extent the other housing developments down the Exe Estuary and including Exmouth) might reasonably be expected to have similar impacts to Cranbrook. The empirical data informing the strategy is also over 7 years old and indeed makes use of the 2011 census which has been superseded by the 2021 census. It is therefore unreliable and unsound to base a plan on such out-of-date data. The impact of Cranbrook and of the proposed developments on Exeter to be reassessed using more up-to-date data before the plan is approved. The Infrastructure Delivery Plan includes significant rail developments to make EDDC's S19 plan workable in respect of

sustainable travel and its likely impact on the road network and Exeter. However, there are no costings or commitment from Network Rail. It is unclear where these proposed developments stand and whether they now feature in Network Rail's business plans. This needs to be clarified positively before the plan can be considered sound. The WSP Mitigation Modelling dated 9 December 2024 cites the possibility of four P&R sites, and whilst that at Peamore has planning approval, those at Markham and EDNC North and EDNC South have not been consulted upon. Indeed, the proposal by the highway authority for a P&R site at the A30 Ide interchange has previously been proposed by them but did not succeed because of public objection and an inability to demonstrate that a bus link would be effective on the already congested Alphington Road. As for the two proposed in East Devon, the EDNC South site is unlikely to be effective at peak times because the A3052 and Clyst St Mary roundabout are already congested. Although improvements for the highway at the A3052/A376 roundabout is highlighted in chapter 11 of The Plan, the Infrastructure Delivery Plan does not include any works to improve this route to the M5/Exeter. The Infrastructure Delivery Plan also includes significant development by South West Water (SWW) on a new sewage treatment plant for the new town and development of the one at Countess Wear. Since the IDP was prepared Ofwat has determined a significantly lower price increase to support SWW's business plan than the company sought. The continued inclusion of these items in SWW's business plan needs to be settled before EDDC's own plan and the allocations it provides can be approved.

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The traffic and transport consequences of the proposed development at the West End and Exmouth are significant, have been inadequately considered and deserve further analysis and assessment.

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The 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(b). If no, please give details 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 Lymph_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(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 Lymphstone on the Exe Estuary, and our review of regulatory requirements and best practice standards.

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: In relation to the very large housing allocations on the western side of Exmouth, (Exmo 17 and 20) the OVA are very concerned about the lack of infrastructure and necessary support facilities, such as medical, dental, social, educational and highway capacity to accommodate the large increase in population arising from 1,110 new homes in this area. These developments will be closer to Budleigh Salterton than Exmouth town centre, so full consideration to the potential and likely significant impacts on this small settlement must be undertaken, with full public discussion and consultation.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

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

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

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

Minerals and Waste Planning Part of the site allocation Exmo_20, as identified in Strategic Policy SD01, is within the Mineral Safeguarding Area for sand and gravel resource with further land within the wider Mineral Consultation Area. The allocation has the potential to sterilise underlying sand and gravel and constrain future working within other parts of the Mineral Safeguarding Area. This is inconsistent with NPPF paragraphs 223(c) and 225, and Policy M2 (Mineral Safeguarding Areas) of the Devon Minerals Plan which highlight the importance of identifying Mineral Safeguarding Areas and Mineral Consultation Areas for the protection of mineral resources from non-mineral development. In the absence of measures to protect the mineral resources as specified in the detailed comments in Appendix 1, Devon County Council objects to the allocation of site Exmo_20. Part of the site allocation Exmo_20, as identified in Strategic Policy SD01, is within the Mineral Safeguarding Area for the sand and gravel resource with further land within the wider Mineral Consultation Area. As such, Devon County Council as mineral planning authority objects to this allocation on the basis that development has the potential to sterilise underlying sand and gravel and constrain future working within other parts of the Mineral Safeguarding Area, which is inconsistent with NPPF paragraphs 223(c) and 225, and Policy M2 (Mineral Safeguarding Areas) of the Devon Minerals Plan which highlight the importance of identifying Mineral Safeguarding Areas and Mineral Consultation Areas for the protection of mineral resources from non-mineral development.

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

considered that this part of the plan is unsound as it is inconsistent with national policy, it would be possible to address concerns in one of the following ways:

1. Amendments to the wording in Policy SD01 to reduce the extent of the allocation to omit land within the Mineral Safeguarding Area and Mineral Consultation Area (if this option is taken a Mineral Resource Assessment is not required); 2. Amendments to the wording in Policy SD01 to constrain the uses within the Mineral Consultation Area to less noise sensitive uses, compatible with being located adjacent to mineral extraction and no built development within the Mineral Safeguarding Area (if this option is taken a Mineral Resource Assessment is not required);

3. Prior extraction of the mineral resource in advance of development, where it is economic to do so as demonstrated by a Mineral Resource Assessment undertaken by the landowner or East Devon District Council prior to allocation of the site, with appropriate wording included in Policy SD01 to ensure that prior extraction of the mineral takes place if achievable;

4. A Mineral Resource Assessment is undertaken by the landowner or East Devon District Council prior to the allocation of the site, which indicates the mineral resource is not of current or potential economic value. Should a Mineral Resource Assessment be undertaken and indicate that the mineral resource does have current or potential economic value then one of the options 1-3 listed above should be pursued. In the absence of measures to protect the mineral resources as specified in the options above, Devon County Council objects to the allocation of site Exmo_20. DCC would be happy to discuss with EDDC appropriate amendments to the policy wording as may be required.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

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

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

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.:

Comments relating to Exmo_23 and Lymp_07: To ensure a coordinated and comprehensive approach, DCC suggests that the Exmo_23 and Lymp_07 allocations could be covered by a single section (similar to the approach for Exmo_08 and Exmo_16), reading as follows or similar wording: “Land at Courtlands Lane (Exmo_23 and Lymp_07 combined) The land south of Courtlands Lane (within the Exmo_23 allocation) will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes. The site at Courtlands Cross north of Courtlands Lane (within the Lymp_07 allocation) will accommodate around 100 new homes and 0.4 hectares of employment land. The field to the west of the housing allocated land is allocated for delivery of sports pitch uses and associated low key ancillary facilities as part of a viable package of planning obligations. Built development at this site, located on the two south-easterly fields, will need to be particularly sensitively designed to avoid potential for adverse impact on nearby heritage assets and to avoid adverse landscape impacts. These allocations will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. Particular importance is attached to retention of the East Devon Way footpath, in a spacious corridor, across the Lymp_07 site in a north-south direction. There should also be safe off-street pedestrian and cycle access that provides for east-west movement through the area for existing and future users linking into adjacent areas such as Lympstone Manor. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Through this masterplan, particular account will need to be taken of providing active travel links to the wider network and towards the town centre with alterations to vehicular access along Courtlands Lane.” Comments relating to Lymp_14 and

Exmo_04a: DCC also requests that an additional paragraph be added to the text relating to both the Lympton_14 and Exmo_04a allocations: “The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.” Comments relating to Exmo_20: DCC also requests that, to clarify requirements and ensure opportunities for sustainable travel are maximised, the text on page 78 relating to site allocation Exmo_20 be amended to read: “This site allocation will need to come forward on the basis of an agreed masterplan and access strategy for the whole site that clearly demonstrates how phased comprehensive development will be undertaken and implemented, including with appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Full agreement will be required before any specific parcels of land can come forward for development. Built development will need to be concentrated in the southern parts of the site and the scheme will need to place considerable emphasis on protection of the setting and tranquillity of nearby heritage assets, specifically St John in the Wilderness church. Support will be given for expansion of the churchyard, to provide more burial/interment of ashes space at St John in the Wilderness. Parts of the site and adjoining areas, especially woodlands are of biodiversity importance and sensitivity and great care will be needed in developing proposals to ensure their protection and enhancement. New homes and other development that would result in unacceptable impacts will not be permitted within 400 meters of the Pebblebed Heaths. The development will need to be supported by a new developer provided SANGs, brought forward and implemented as part of the overall scheme on the allocated or on nearby land. Vehicular access, to accommodate modest levels of development, will be allowed for southern site parts from the road ‘Southern Wood’, subject to detailed assessment of highway access acceptability and objective review of local road and junction capacity. Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the north. Mitigation measures may be required to address potentially unacceptable adverse highways impacts, including at locations on the wider highway network. High quality, safe and attractive to use pedestrian, cycle and public transport access, particularly providing southerly site links into Exmouth and to nearby services, facilities and job opportunities, will need to be an essential part of the overall development scheme. As part of this, consideration should be given to alterations to vehicular access on St John’s Road, in order to help create quiet routes for walking and cycling.” Comments relating to Exmo_17: DCC also requests that, to clarify requirements and ensure opportunities for sustainable travel are maximised, the final paragraph of text on page 79 relating to site allocation Exmo_17 be amended to read: “Vehicular access will be from Salterton Road and will need to take a harmonised approach with the industrial estate to the north of the road, potentially with a shared intersection. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. As part of this, consideration should be given to exploring alterations to

vehicular access on Castle Lane, in order to help create quiet routes for walking and cycling.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

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

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

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.: Land for a primary school is allocated at Goodmores Farm, Exmouth, in the adopted local plan. DCC wishes to clarify that this land is still required for wider education purposes, for example provision for pupils with special education needs and disabilities. There is currently a shortfall of this type of provision in East Devon. DCC requests Policy SD01 includes the additional wording shown below to ensure that education land continues to be allocated at Goodmores Farm in the new plan: “Land for Education at Goodmores Farm Additional provision for pupils with special educational needs and disabilities in Devon is required to support development in Exmouth. Land previously allocated for a new primary school at Goodmoores Farm should be retained for wider education purposes, for example to provide an option for new education provision for pupils with special educational needs and disabilities.”

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to address questions about deliverability of the Council's strategy and housing supply.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr B Penny

Proposal:

5. Development in the Towns and Villages

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

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

3(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.:

MR B PENNY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Bell Cornwell LLP acts as planning consultant for Mr. Bruce Penny, the long standing owner of land to the south of Courtlands Lane. Land registry details (DN548773) show that Mr. Penny is the freehold owner of the site. His land currently benefits from a draft allocation for 12 dwellings under reference Exmo_23. The land is currently in agricultural use. Our client, therefore, has significant interest in the future local plan for the district. Against this background, the following comments are made on the draft policies within the East Devon Local Plan Regulation 19. Consultation. CHAPTER 5. DEVELOPMENT IN THE TOWNS AND VILLAGES Strategic Policy SD01: Exmouth and its development allocations Mr Penny supports the allocation of Land to the South of Courtlands Lane (Exmo_23) for allocation which is land in Mr. Penny's control. The allocation as drafted states: "This land, south of Courtlands Lane, will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes. The scheme will need to demonstrate how safe pedestrian access, avoiding on-road walking, will be achieved to surrounding and neighbouring areas." The objectives of this policy can be delivered, and the site is currently the subject of a planning application. The land is immediately available for development. The wider technical work that underpins the promotion of the site – which has previously been submitted at regulation 18 stage demonstrates the following:

- A landscape led approach to design and layout - perimeter hedgerows retained with ecology buffers retained as required. Additional planting proposed to provide structural planting in the landscape as mitigation for development – see landscaping plan produced by landscape architect submitted at Reg.18 stage.
- Suitable and safe access is available to serve 12 dwellings - see accompanying transport report. Submitted at Reg.18 stage. MR B PENNY REPRESENTATIONS ON THE

EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT
(MARCH 2025) BY BELL CORNWELL LLP 2

- Housing can be delivered without harm to landscape character and the setting of nearby heritage assets.
- The client owns wider land holding (see location plan) and connectivity could be delivered to the Estuary Trail if required.
- The site is excellently located to benefit from public transport (bus services) at the end of Courtlands Lane which run frequently (every 15 minutes) between Exmouth and Exeter. The proposed allocation is supported and justified, and we would ask officers to note that the current settlement boundary as drawn could comfortably provide for 12 dwellings. We would also ask officers to note that Mr. Penny has further land within its control that could be used for the other potential benefits, including additional housing.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: on behalf of Eagle Investments (SW) Ltd in respect of site Exmo_20.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

5. Development in the Towns and Villages

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
on behalf of Eagle Investments (SW) Ltd in respect of site Exmo_47

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMLIII Ltd

Proposal:

5. Development in the Towns and Villages

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the west of Hulham Road, Exmouth. We support the proposed allocation of site Exmo_47 within Strategic Policy SD01: Exmouth and its development allocations for around 15 dwellings. We agree with the policy wording which requires that built development should be accommodated in the southerly parts of the site only and will need to be sensitively designed to avoid adverse impacts on the setting of the Point-in-view Registered Park or Garden to the north and west of the site boundaries. The southern and central part of the site is eminently suitable for a small housing development with the northern part providing an opportunity for landscaping to create a visual buffer to the Historic Park and Garden. This is fully explained within the heritage report prepared by Pegasus which is enclosed with this letter. A mix and range of sites sizes and types in different areas and suitable for a range of different types of housebuilders, and developers, will be required to help achieve a rolling supply of housing, as is encouraged within the NPPF. The NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. The site is within a sustainable location adjacent to the existing settlement boundary of Exmouth and of a size that would mean it could be developed quickly and would be capable of forming part of the Council's five-year housing supply. This site will assist the council in making appropriate provision for small sites. We also support the inclusion of the site within the proposed Settlement Boundary and its exclusion from the Green Wedge on the proposed policies map, which reflects its identification as a proposed allocation. Eagle Investments (SW) Ltd have been working with a local SME housebuilder and have undertaken technical and

planning preparatory work which has confirmed the deliverability of the site for housing. A plan illustrating how the site could be accessed is enclosed with this letter.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMLIII Ltd

Proposal:

5. Development in the Towns and Villages

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

Eagle Investments (SW) Ltd supports the proposed allocation of land which it owns at Exmo_20- land at St John's, Exmouth for mixed use development. The entire site identified on the Policy maps is available for development, is within a sustainable location adjacent to the existing settlement boundary of Exmouth and not covered by any environmental designations. There is a significant need for housing, including affordable housing, within the Exmouth area and the Exmo_20 site is suitable for development to meet those needs over the emerging plan period, along with a mixture of uses and community facilities, as part of a highly sustainable urban extension, as the Council's own site assessment has found. The draft policy proposes a comprehensive development scheme to accommodate social and community facilities, around 700 new homes and at least 2 hectares of employment land. Eagle Investments (SW) Ltd have previously submitted to the Council a Vision Statement and a subsequent Addendum (dated October 2024). These are both enclosed again with this letter so that they can be included in the package of information that is forwarded to the Local Plan Inspector. The Vision Statement and Addendum begin to demonstrate how the site allocation will be able to come forward on the basis of masterplan for the whole site. It is intended that discussions will commence with the Council as soon as possible regarding the draft policy requirement to agree a comprehensive masterplan for the site including how phased development will be undertaken. The Vision Statement and Addendum provide confidence that built development can be concentrated in the southern parts of the site while protecting the setting and tranquillity of nearby heritage assets, specifically St John in the Wilderness church. It also explains how the woodlands within and adjoining the site will be able to form a major asset and help in the achievement of high quality placemaking. Furthermore, it illustrates that

development will not need to protrude within 400 metres of the nearby Pebblebed Heaths. A Landscape and Visual Appraisal of the site is enclosed and demonstrates that there are no landscape or visual impact barriers to the development of the site as envisaged. The Addendum to the Vision Statement provides an overview of the access and transport strategy which the development of the site could adopt. It explains how vehicular access to accommodate development in the southern parts of the site can be provided from 'Southern Wood'. A plan illustrating how this can be achieved is enclosed. It also explains that the master planning of the site will maximise pedestrian and cycle links between the existing, adjacent residential and employment areas and the proposed new neighbourhood, through the provision of connected streets designed to be suitable for cycling and walking and, where appropriate, additional measures to ensure that cycling and walking are a safe and attractive means of transport to access existing bus services on Dinan Way and allowance for future provision of new local bus services within the development. This will ensure that walking, wheeling, cycling and public transport will be the natural first choice for short local journeys, in accordance with the requirements of draft Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport. A Transport Technical Note is also enclosed and explains that initial modelling has concluded that traffic Impacts on the nearby road network will be insignificant due to the planned road improvements to Dinan Way, which will enhance capacity and ensure efficient traffic flow. We consider that the inclusion for a requirement to provide at least 2 hectares of employment land requires some explanation and clarification within the draft policy. We note from Strategic Policy SP04 that the proposed uses to be included with the Exmo_20 site are to be limited to light industrial uses falling within Use Class E(g) (iii), being those which can be carried out in any residential area without causing detriment to the amenity of the area. As a minimum, confirmation of this within the draft policy is required to avoid any confusion as the site would not be suitable for B2 (General Industrial) or B8 (Storage and Distribution) uses for a variety of reasons. The Vision Statement and Addendum indicate that the Masterplan will include Workshops and Studios as part of a mixed-use development along with a local centre, Primary school (if required by DCC), community hub and working hub. Rather than specify 2 ha of land take for light industrial uses, it would be more appropriate for the policy to include a requirement for the inclusion of employment generating uses, as proposed by the Vision Statement, including uses falling within Use Class E a, b, c, d, e, f and g (iii). Exmo_20 site is not within the nationally important National Landscape (formerly AONB) and neither is it within any current local plan Green Wedge or Coastal Preservation Area designations. The proposed allocation of the site over sites which are within the National Landscape and other designations is entirely Justified and Consistent with national policy which requires that plans distinguish between the hierarchy of international, national and locally designated sites and allocate land with the least environmental or amenity value. Eagle Investments (SW) Ltd are working with a local SME housebuilder and

commencement of development of a first phase could be commenced within the next two years so that it can make a meaningful and valuable contribution to housing delivery within the next 5 years and beyond.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMLIII Ltd

Proposal:

5. Development in the Towns and Villages

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the south of Hulham Road, Exmouth. Eagle Investments (SW) Ltd supports the proposed allocation of the land it owns as site Lymp_14 within Strategic Policy SD01: Exmouth and its development allocations. The site adjoins the north eastern boundary of the current Local Plan W147 housing allocation, which is currently under construction and known as Goodmores. Access to the site could be achieved from its western boundary through the adjacent Goodmores development. The site could therefore be developed as natural extension of the Goodmores site. There is a significant need for housing, including affordable housing, within the Exmouth area and the site is suitable for development to meet those needs over the emerging plan period as the Council's own site assessment has found. The site is available for development. The site is within a sustainable location adjacent to the existing settlement boundary of Exmouth and of a size that would mean it could be developed quickly and would be capable of forming part of the Council's five-year housing supply. Indeed, an outline planning application (LPA Ref. 25/0007/MOUT) proposing residential development on the site has been submitted and is currently under consideration by the Council, demonstrating that development on the site is achievable now. Eagle Investments (SW) Ltd have been working with a local SME housebuilder and development of the site can be delivered within the next three years.

Full name: James McMurdo

Organisation (where relevant): McMurdo Land Planning and Development Ltd

Other party name (if relevant): Mr A Lalani

Proposal:

5. Development in the Towns and Villages

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

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

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

- in the Built Up Area Boundary of Exmouth, the district's largest town;
- in an area where the dominant use is residential;
- within easy walking distance of the full suite of facilities and should form part of policy SD01, which allocates land in the built up area boundary of Exmouth, especially when it will deliver much needed housing and affordable housing.

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

- Land at Devoncourt Hotel Douglas Avenue Exmouth for 51 open market and 15 affordable residential apartments and a 65 bed hotel.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As we have set out above, we still consider the proposed housing provision at Exmouth is too low and the opportunity to bring sites forward that maximise the opportunity to deliver housing earlier in the Plan period should be further considered. As the Regulation 18 and 19 site selection processes has identified there is significant capacity at Exmouth for a range of smaller sites to come forward that can benefit from existing infrastructure and accessibility.

In terms of the proposed allocations for Exmouth we offer the following comments:

COURTLANDS CROSS (LYMP_07)

We fully support the allocation of Courtlands Cross and a Framework Plan has previously been provided to the Council that highlights the opportunity the site provides, including: a design and landscape led development on the northern edge of Exmouth, the delivery of energy efficient homes to meet local needs, including affordable housing; the provision of recreational benefits through new sports pitches and a new club house; significant areas of landscaping and public space; provision of ecological habitat and enhanced pedestrian routes and connections to the wider network.

The Framework plan demonstrates how the proposed development responds sensitively to landscape and heritage considerations and the opportunity the site provides for connectivity to the wider footpath network.

LAND AT ST JOHN'S (EXMO_20)

Our clients are concerned that the allocation of the St John's site was based on a inconsistent approach to site selection which resulted in the site being allocated at a very late stage in proceedings, having been previously rejected for allocation at the Regulation 18 stage. Its inclusion has directly led to a number of other sites which were previously identified being removed from the Plan altogether.

This is despite officers during the site selection process raising concerns regarding a number of uncertainties relating to the deliverability of the site and the need for further work to be undertaken. It is not clear that any further work has taken place to underpin the now proposed allocation of the site.

This is important to understand because there are clear delivery issues. From an access and sustainability perspective the site is distant from existing services and facilities. This separation would be increased by a proposed northern access onto the B3179 and result in rat running on unsuitable roads as well as creating capacity issues on junctions and roads in the locality.

The site is sensitive in respect of ecology issues, particularly given its proximity to European sites. The site also includes extensive woodland areas most of which are wildlife sites. There are also important heritage matters that would need to be addressed with large parts of the site forming part of the setting of the Grade II* St John's Church which contributes significantly to its special interest and is a designated asset of the "highest significance". Residential development on the field parcels nearest the church would result in a detrimental harm to the special interest of the church, alongside other associated heritage assets. This is likely to significantly reduce the developable area of the site and its overall capacity to that assumed in the allocation.

The site appears to have been supported for allocation on the basis of quantum rather than a proper consideration of delivery factors. Instead, assumptions that a larger site

will deliver additional infrastructure and services and facilities to serve its needs are unlikely to be realised because of the constraints highlighted above. In any case for a truly sustainable community to be created in this location, distant and separated from existing services and facilities, a greater scale of development would be required to make the delivery of necessary infrastructure viable.

It is clearly a more sustainable strategy to deliver a range of sites which provide good access and connectivity options to existing services and facilities whilst offering opportunities for enhancement of existing infrastructure to support the growth of the town. This will also be more beneficial in ensuring the Plan is resilient in meeting housing needs at an early stage of the Plan period.

LAND AT HULHAM ROAD (LYMP_09 AND LYMP_10A)

One such site that could come forward early in the Plan period that does not have the delivery concerns identified with the St John's site is our clients site land at Hulham Road (Lymp_09 and Lymp_10a), which was previously a preferred site allocation in the Regulation 18 Plan and was identified as officers for allocation in the Regulation 19 Plan. However, it was subsequently omitted through the site selection process.

This was disappointing as an indicative Framework Plan had been shared with the Council. This identified the clear positives of comprehensive development of the site through a landscape and design led scheme and demonstrated the site's opportunity to deliver an attractive residential development in close proximity to local facilities and with good connections into Exmouth, existing planned growth at Goodmores Farm and the wider area. A copy of the Framework Plan is attached at Appendix 1.

However, despite clarifications Members ruled the site out on the basis of concerns in relation to connectivity of the site to wider services and facilities. This failed to take into account the significant improvements the scheme proposed (agreed in principle by Devon County Council) along Hulham Road that would significantly improve highway safety and the walking environment for pedestrians, as well as providing safe crossing points to the south to match desire lines that link to the existing footpath network.

Other concerns raised in respect of loss of trees were unfounded and the site was incorrectly referred to as being in the adopted Coastal Preservation Area (CPA). Evidence was also provided at the Further Regulation 18 stage to show that the site did not demonstrate visual openness or have views to and from the sea or to have any visual connection that would warrant its inclusion in a revised CPA boundary. The Review undertaken by Pegasus was included in the Further Regulation 18 representations made by PCL Planning on behalf of Waddeton Park Ltd. This evidence is again appended to these Regulation 19 representations as Appendix 2.

There are no good reasons for the Plan not to allocate the Hulham Road site. It represents a logical extension to the town and will support a high-quality residential development alongside important highway improvements. Furthermore, it is a site that is relatively unconstrained nor overburdened by infrastructure requirements. The site can come forward quickly to support delivery in the earlier stages of the Plan period and provide much needed resilience to the Plan's strategy. Without having a range of sites within Exmouth the Plan will over rely on site's like St John's which are more constrained and difficult to bring forward, particularly given the significant uncertainties around the deliverability of that site.

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

We believe further growth at Exmouth should be provided for through the allocation of further sites. This will underpin the Plan's strategy to ensure sufficient housing growth in the town throughout the Plan period, including at an early stage. The site at Hulham Road is unconstrained and has been identified as a preferred choice site based on its suitability. There are no impediments to its delivery and as such it can make an important contribution to the Plan.

Policy SD01 should therefore be modified to include land at Hulham Road (Lymp_09 and Lymp_10a) as an allocation.

Further work should also be undertaken to underpin the allocation at St John's to address some of the clear delivery issues set out in these representations and raised as matters to be addressed within the relevant policy wording of the allocation. If these cannot be overcome, then this does bring significant doubt as to whether the site should continue to be allocated.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

5. Development in the Towns and Villages

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

5.1. These representations have been prepared on behalf of Bloor Homes, who are in the process of submitting a hybrid planning application in respect of Land to the South of Littleham, Exmouth, which is allocated for a residential led, mixed-use development of 410 homes and 1.6 hectares of employment in the East Devon Local Plan 2020 to 2042. The site is the subject of signed Planning Performance Agreement with East Devon District Council and has also been presented to the public.

5.2. It is Bloor Homes' view that the site represents a sustainable, deliverable and suitable site for residential development that will help meet the overall housing needs in East Devon and, crucially, will provide housing and new employment space for growth in the principal centre of Exmouth. The site will assist in meeting pressing affordable housing requirements in the town and the wider East Devon area. Moreover, the fact that it is the subject of a planning application now means that it will come forward early in the plan period thereby helping to meet five-year housing land supply provision as well as provide a consistent and sustainable trajectory of sites coming forward.

5.3. Given this, Bloor Homes fully support the site's allocation for a residential development of 410 homes with employment space to be provided of 1.6 ha of employment space and new community facilities.

5.4. Bloor Homes therefore generally support the Council's approach to the spatial strategy and residential land allocations and consider that it is sound, justified and positively planned. However, Bloor Homes consider that the drafting of some of the policies could be clarified through the provision of further detail whilst some policies will benefit from the inclusion of more flexibility. It is felt that Exmouth should be at the

top of settlement hierarchy together with developments in the West End, whilst more flexibility should be applied to employment designations, affordable housing provision and open space requirements.

5.5. Bloor Homes' key comments on the Regulation 19 Publication Draft can be summarised as follows:

- Exmouth should be considered similarly to proposed developments in the West End in the settlement hierarchy.
- The allocation of Land to the South of Littleham in Policy SDO1 is supported.
- Bloor Homes do not object to the overall direction of strategic employment policy but consider that there is a need to include more recognition that employment and job creation come from a variety of different sources and uses.
- The viability of the current approach to the provision of affordable housing is questioned and should be reviewed.
- It is considered that the policy on older persons housing is too specific in its requirements and that it also raises viability concerns.
- Clarification is required on the need to provide for a masterplan or a design code on strategic allocations; and
- The drafting of policy on ecology, landscape and heritage matters should be reviewed to ensure consistency with national guidance.

5.6. In summary, Bloor Homes supports the allocation of Land to the South of Littleham, Exmouth for residential led development. It is considered that the site represents a suitable and sustainable location for development comprising approximately 410 homes. The site is also under the control of one party and is available and deliverable in the short term, as seen by the ongoing work to prepare an application for the site during 2025.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

5. Development in the Towns and Villages

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

4.38. Strategic Policy SD01 identifies the sites allocated for development in Exmouth.

4.39. The Council's settlement hierarchy confirms Exmouth's sustainability credentials by being the only Tier 1 settlement in East Devon. Given our comments in respect of Strategic Policy SP01, it is Bloor Homes' view that Exmouth should be held in the same regard in terms of growth as the proposed new town and Cranbrook and comprise a 'focus' for new development. Notwithstanding this, Bloor Homes supports this policy in that it is actively bringing forward the Land to the South of Littleham, which is identified within this policy as an allocated site for development.

4.40. The benefits of the site are set out in Section 3 – The Vision. The proposed development at Land to the South of Littleham will provide for high-quality new homes in a mix of sizes and tenures that will provide for an attractive place for people to live, work and play.

4.41. Bloor Homes are in the process of preparing a hybrid application for the site at Littleham. This is in advance of the Local Plan, and its adoption, but indicates how the site is a viable, deliverable and appropriate location for residential development that is free of constraints.

4.42. Strategic Policy SDO1 notes that site, which is on the north eastern side of Exmouth is allocated for a mixed-use development to provide:

- Around 410 new homes.
- 1.6 hectares of employment; and
- Supporting community uses.

4.43. Bloor Homes' scheme, which is currently being prepared, is based on this quantum and disposition of uses and will provide for each element. The residential development will be for approximately 410 homes and, in this regard, we note that supporting Paragraph 5.2 states that higher or lower levels may be possible depending on site-specific constraints or opportunities. This flexibility is supported given that that overall capacity of sites will often depend on site-specific matters.

4.44. Turning to the employment area, the application for this area will likely be in outline given that technical evidence is in the process of being prepared. Accordingly, the application will secure the use of this part of the site for employment. However, as our comments to Strategic Policy SP4 note, if evidence can be provided to demonstrate a non-traditional employment use or an area less than that allocated is more appropriate then the Local Planning Authority should considered any later, detailed applications in this light.

4.45. The policy notes that the allocation at Littleham will need to come forward on the basis of an agreed masterplan for the whole site, which clearly demonstrates how comprehensive development will be undertaken and implemented. Bloor Homes supports this approach and are in the process of preparing a site masterplan that will incorporate the different elements. This includes the supporting community uses, which are currently focussed around a proposed intersection with the cycle path.

4.46. The masterplan will be cognisant of the site's sensitive location within the NL. The proposed development will be landscape-led and will benefit from significant areas of open space on site that will be utilised for SANGs, drainage attenuation, biodiversity and amenity open space. The development will therefore sit in a strong landscape framework that will maintain the site's connection within the wider landscape.

4.47. The current masterplan reflects the listed church to the south through maintaining its setting by locating SANGs in the south. This aspect will link with the potential additional cemetery provision that is being considered as part of the proposed development. The SANGs is to be provide on-site and is to be located between the new development and the existing settlement of Littleham thereby benefitting both existing and new residents with accessible, open space that will be consistently and appropriately managed for the next thirty years.

4.48. The site is highly accessible as it is within walking distance of facilities within Littleham whilst it will supplement these through the development of new community facilities in the form of a possible community space, new commercial facilities and or local workspace. The proposed development will be serve by a new roundabout at Salterton Road that would also accommodate a new arm from Liverton Business Park, thus, creating a shared intersection (which is a requirement of the policy).

4.49. Opportunities to prioritise travel by sustainable modes will also be taken through the cycleway and the introduction of new footway provision along Salterton Road and new footpaths and cycleways through the site. The site will create an environment where green space and green corridors create a sense of living in the landscape. A number of key amenity spaces will be created that will be linked by green corridors around the perimeter of the site and permeating through it. The eastern edge of the site will be enhanced to create a natural edge to the site and Littleham.

4.50. The proposed development of the site will be sensitive to flooding matters and will introduce Sustainable Drainage Systems (SuDS) through natural attenuation ponds that will help reduce the volume and rate of surface water. It will also meet biodiversity net gain requirements, comply with the Future Homes Standard, and include EV charging points and solar panels. Recommendation

4.51. Bloor Homes support this policy and the allocation of Land to the South of Littleham to accommodate a residential-led mixed use development of approximately 410 homes, employment land and community uses. Bloor Homes are in the process of preparing a detailed application for the residential element that will be submitted with an outline application for the employment land. The application has been driven by an

emerging masterplan will seeks to address each of the points noted in the policy, which is:

- Landscape-led, sensitive design to reflect the site's location in the NL.
- Appropriate and viable employment space.
- New access arrangements and suitable interchange with the existing cycle path.
- New community hub based on the cycle path.
- Understanding of the setting to the listed Church.
- New SANGS provision together with amenity open space and play facilities.
- Sustainable drainage features that will help enhance biodiversity; and
- Low carbon, fabric first design of the buildings to meet the latest regulatory standards.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

5. Development in the Towns and Villages

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

1.1. These representations have been prepared on behalf of Bloor Homes Exeter Limited (herein known as Bloor Homes), who have an interest in Land to the South of Littleham, Exmouth.

1.2. The Land to the South of Littleham, Exmouth is allocated for a mixed-used development, which seeks to develop around 410 new homes, 1.6 hectares of employment, and supporting community uses under Strategic Policy SD01: Exmouth and its development allocations in the East Devon Local Plan 2020 to 2040 (Regulation 19 Publication Draft).

1.3. Bloor Homes are wholly supportive of this allocation and have, for the past six months, been working in partnership with Clinton Devon Estate, who is the owner of the site, to promote this site for residential development. Bloor Homes are in the process of preparing a robust evidence base and completing survey work with a view to submitting a hybrid planning application in Autumn 2025. The site is the subject of signed Planning Performance Agreement with East Devon District Council and has been subject to public consultation.

1.4. Bloor Homes are well versed in promoting and developing strategically important sites such as the Land to the South of Littleham. They are the largest family owned and run housebuilder in the country and are active in Devon with schemes being developed at Pinhoe, Exeter, and Dawlish.

1.5. These representations have been submitted in response to the East Devon Local Plan 2020 to 2040 (Regulation 19 Publication Draft). Bloor Homes have only recently become involved in the site. As such, these representations build upon the submission

made by Clinton Devon Estates to the Regulation 18 Consultation Draft. Accordingly, the representations are submitted on behalf of Bloor Homes and Clinton Devon Estates in respect of this site, although, for ease of reference, only Bloor Homes is referred to when discussing the representations. It is understood that Clinton Devon Estates will be submitting separate representations in respect of their other interests whilst Bloor Homes will also be submitting additional representations regarding their other sites in East Devon.

1.6. The preparation of the Local Plan commenced in 2021 and has moved through the initial stages of evidence gathering and options assessment. It is now at the Publication Draft Stage following the Draft Local Plan Consultation (Regulation 18) stage that occurred between November 2022 and January 2023 (and latterly the Further Draft Local Plan Consultation between May and June 2024).

1.7. The Land to the South of Littleham, Exmouth was allocated in the Regulation 18 Consultation Draft for a mixed used development of 410 homes and 1.6 hectares of employment land. These representations will therefore demonstrate how the site is an appropriate, deliverable and suitable proposition for residential development and that the Local Planning Authority has been correct in its approach to allocate this site as a means of providing new homes to support the growth of the principal centre in East Devon.

1.8. The residential development of the site fully aligns with the vision and strategic objectives of the Local Plan. These representations will illustrate how it can help meet the Council's overall housing requirement whilst enabling sustainable growth at Exmouth. It will introduce new facilities and provide support for the existing services in Littleham. The site can be delivered in the short term thereby helping to meet five-year housing land supply requirements. It is not reliant on significant infrastructure whilst it is considered site-specific matters relating to landscape impact, open space provision and relationship with existing infrastructure can be successfully overcome.

1.9. Accordingly, the site has numerous benefits:

- It is under the control of parties, who can bring forward development at pace.
- The development of the site will significantly contribute to the overall housing delivery in the early part of the Local Plan period.

- It has the ability to achieve a comprehensive, high quality residential development.
 - The development of the site will be landscape-led given its sensitive location in the National Landscape (NL).
 - It will provide for much needed new market and affordable housing within the principal centre of Exmouth.
 - It will create new employment opportunities through new job creating development that will enable sustainable growth.
 - The proposed development will incorporate Suitable Alternative Natural Greenspace (SANG) that will serve both existing and new residents of Littleham; and
 - New community facilities will be provided together with support for existing services in Littleham.
- 2.1. The site is located to the east of Exmouth, adjacent to the village of Littleham. It lies immediately south of the Liverton Park Retail Estates. The northern boundary is formed by the B3178 Salterton Road. To the west of the site is the settlement boundary of Littleham, which consists of a relatively recent small residential development and older properties along Chapel Lane, which are larger in size.
- 2.2. Further to the south is the cemetery and grounds attached to the St Margaret's and St Andrews Church, which is a Grade II* Listed Building. The site's southern boundary is formed by the church and a series of small, detached properties. To the east, there are open fields and countryside. The site forms part of the East Devon NL.
- 2.3. The site is approximately 30 hectares in size. It consists of a series of large, flat arable fields that slope from the north to the south. There are a series of hedgerows that traverse the site together with some mature trees, which can be found more towards the

south. There is also the Exmouth to Budleigh Salterton Cycle Track that runs through the lower central part of the site.

2.4. The majority of the site is located in Flood Zone 1 apart from an area in the southern part that follows the path of the Littleham Brook, which is Flood Zone 3. The site is located in a SSSI Impact Risk Zone whilst, in addition to the main St Margaret's and St Andrew Church, its Lychgate at the entrance is also listed.

2.5. Exmouth is the largest town in East Devon with a population of around 35,700 residents. It grew rapidly in Victorian times as a popular seaside resort and tourism still forms an important part of the town's economy, although there is a substantial flow of out commuters to Exeter.

2.6. The town has a wide range of services and facilities with a large secondary school and primary schools, a variety of shops, sports facilities, a library, GPs, hospital, railway station and regular bus services. The town centre, where most facilities are located, is positioned in the south westerly part of Exmouth. Previous Site Promotion

2.7. The Land to the South of Littleham, Exmouth was the subject of representations submitted by Bell Cornwell LLP on behalf of Clinton Devon Estates to the Regulation 18 Consultation Draft. In relation to Policy 20, which considered Exmouth, Clinton Devon Estates strongly supported the Plan's proposal to locate a substantial amount of new development at Exmouth given the town's size and sustainability attributes.

2.8. The Estate also strongly supported the proposed allocation of the specific sites within Policy 20. They stated that all of the sites were deliverable and suitable for development. They were also well related to Exmouth's existing built-up area. The representations noted that the Estate had been involved in promoting these sites for development and had made submissions to the Housing and Employment Land Availability Assessment (HELAA).

2.9. In terms of Land to the South of Littleham, the representations stated that the land is able to deliver a substantial amount of growth to Exmouth and in a manner which would provide a number of benefits.

2.10. In addition to being able to provide a sizeable amount of housing, development of this land would be well sited close to the existing employment areas at Liverton Business Park and at Dinan Way and would therefore be sustainability sited. The allocation of the northern part of the land for employment use would be sensible in that it would relate well to the existing Liverton Business Park and can help to provide balanced growth in the town. The Estate supported the proposed allocation of this land. Site Delivery

2.11. The delivery of the Land to the South of Littleham benefits from Bloor Homes, together with Clinton Devon Estates, controlling all of the land. In these terms, Bloor Homes has experience of delivering strategic residential-led, mixed use sites that will deliver the proposals from start to finish.

2.12. The land is free from any major physical constraints that would prevent the site from coming forward early in the Plan period. In this regard, Bloor Homes have entered into negotiations with Officers from East Devon District Council regarding the preparation and submission of a hybrid planning application for the site. The intention is to submit the planning application in Autumn 2025 to coincide with the Examination into the Local Plan.

2.13. Accordingly, these representations demonstrate the site's capacity to deliver 410 new homes, 1.6 ha of employment and community benefits in the short term thereby providing much needed new housing for Exmouth.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: A supporting Statement has been submitted on behalf of Bloor Homes in respect of Land to the South of Littleham, Exmouth. It has been submitted in respect of Policy SP01 but considers Policy SD01 and others

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.: Please see Supporting Statement

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

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

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Please see Supporting Statement

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The matters raised in our representations affect matters of strategic importance that run to the heart of the East Devon Local Plan 2020 to 2042. In our capacity as a major housebuilder, we would welcome the opportunity to partake in the hearing session(s).

Full name: Mr A Shepley

Organisation (where relevant): Rubix Strategic Ltd

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

1. On behalf of Rubix Strategic Ltd (“Rubix”), we wish to comment on Strategic Policy SD01, and specifically on proposed allocation - Land at Marley Drive (Site ref: Exmo_04a).

2. Whilst Rubix supports this allocation in principle, it is considered that the proposed quantum of c.50 dwellings is insufficient as the site can accommodate significantly more than this, taking into account the site characteristics and constraints.

3. Rubix has recently submitted an outline planning application seeking approval for residential development comprising of up to 130 dwellings, public open space, landscaping, sustainable urban drainage system and engineering works, with vehicular access off Higher Marley Road (Application ref: 25/0078/MOUT).

4. The Concept Masterplan submitted with the application (Ref No: RS402/120 Rev.H – attached), illustrates how the site can be developed for this higher quantum, whilst retaining significant areas of parkland and incorporating additional tree planting to mitigate for the small loss of existing trees required to accommodate the development. The Plan also allows for pedestrian/cycle links, both to the adjoining proposed allocation (Lymp_14) and the existing development at Goodmores Farm.

5. The Concept Masterplan has had significant regard to various surveys undertaken regarding ecology/biodiversity, landscaping and arboriculture, and has been designed to ensure that the development maintains the overall landscape/parkland character of the site.

6. It is considered that an allocation of c.50 dwellings fails to make efficient use of the site in terms of achievable residential densities, considering in particular its very sustainable location on the edge of the Tier 1 settlement of Exmouth. This is inconsistent with national policy, as contained within the NPPF, and the emerging Plan is therefore unsound in this regard.

7. Paragraph 129 of the NPPF states: Planning policies and decisions should support development that makes efficient use of land, taking into account: a. the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; b. local market conditions and viability; c. the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use; d. the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and e. the importance of securing well-designed, attractive and healthy places.

8. Paragraph 130 goes on to state that: "Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site."

9. East Devon DC cannot currently demonstrate a five-year supply of housing land, falling well below this target at just 2.97 years (December 2024). In such circumstances, and considering NPPF paragraph 129, the Council should be seeking to maximise development densities at proposed allocations, taking into account prevailing environmental and other constraints. 10. As advised, Rubix considers that the development proposed under the current outline application ref: 25/0078/OUT provides a suitable density of development across the entire site, whilst ensuring environmental constraints have been taken into account and appropriate design and/or mitigation measures incorporated within the scheme.

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.: Therefore, in order for Policy SD01 to be considered sound, proposed allocation Exmo_04a should be modified to increase the quantum of development to "around 130 new homes".

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To assist the Inspector with regard to quantum, deliverability and availability of a specific housing allocation (i.e. Exmo_04a - Land at Marley Drive).

Full name: Scott Mills

Organisation (where relevant): Scotty Mills Consulting

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Full name: Scott Mills

Organisation (where relevant): Scotty Mills Consulting

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Full name: George Boyd and Susan Abbott

Proposal:

5. Development in the Towns and Villages

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

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

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

PROPOSED NEW HOUSING SCHEME AT ST JOHNS ROAD ExMO 20a/20b ST JOHNS I had written to you on 6 October 2024 detailing my objections to the above plan but you explained that my letter was too early to be considered. I have tried to lodge my objections using the "commonplace" online method only to be repeatedly refused on the basis that my confirmation code submitted was incorrect. Why I need a confirmation code is beyond me and I can only guess you are trying to make the process of lodging an objection as difficult as possible. Therefore I am updating my original letter setting out our worries about your plans and I hope that you will be able to pass this onto the appropriate officer dealing with the objections to your proposed scheme. I am writing to object to the above proposal which includes the changing of the lane from our home, Bystock Stables, leading up to St Johns Road, into a Cycle Path. We purchased our home in 1998, the property having been empty and unused since 1986 was derelict at the time. We had the property largely rebuilt and extended to provide suitable accommodation for myself and my wife as we are permanently disabled as a result of spinal injuries and both of us are full-time wheelchair users. The narrow lane that leads up from our home onto St Johns Road is well in excess of 100 metres and is owned by Eagle Investments but has only one passing point, which was installed by us at the insistence of EDDC and is at the top of the lane opposite Owls Cottage. The lane itself was tarmacked by the owner some years ago and we paid half of the costs to him which amounted to £5,000 at the time. The lane is used daily by me and my wife as we each own and drive adapted vehicles, we also use the lane to get to the road when using our electric wheelchairs which is quite often. The access to our home is used on a regular basis by Royal Mail and sundry other delivery vans/cars, also by our home help and care visitors on a weekly basis. The chemist and community nurses on a regular basis as and when required, tankers from Southern Fuels to deliver oil and Spirebourn to empty and maintain our septic tank, because of access both have to ensure that they do not send their large tankers and we also have other sundry visitors plus friends and family throughout the year. We are surrounded by fields and woods but due to our circumstances we are unable to reach the road across the fields or through the woods

and our only option to leave our home is via the lane. Therefore, in view of the above, we hope that the change of our lane to a Cycle Path will not be granted and we can continue to enjoy full use of the lane.

Full name: Cathy Adams

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

Full name: Cathy Adams

Proposal:

5. Development in the Towns and Villages

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY 0L05 of the Local Plan.

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

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

Full name: G.J .Adams

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo _20 would have adverse effects on Woodbury & Bicton common, it's also in conflict with Policy ARO1B .To much building already through Marley towards the common. I remember the flooding in the 1960s ,recently (within the last 5 years) i have seen the withy brook almost over the bridge in Bradham lane .Goodmoor farm development already causing water level rises. Spring tide & heavy rain, I dread to think about the consequences.

Full name: Sarah Allen

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the land in Exmouth named Exmo_17. Until recently it was protected against building and hundreds of Exmouth residents said this shouldn't be removed. We are in a climate and ecological crisis and should not be using greenfield sites particularly those that in the past have been deemed coastal protection areas, so surely still need to remain as they are.

The access road is proposed to go across the popular foot and cycle path connecting Exmouth to Budleigh. This type of active way of travelling is essential to reduce carbon emissions. I believe that this road and the housing will have a negative impact on people who wish to use the area and the path for travel, exercise and their mental health.

Full name: Arthur Keith Amor

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo 20 would significantly increase car use in the area and as the access to the proposed development is closer to Budleigh Salterton than Exmouth the tendency of the occupants of the site would obviously be to drive into Budleigh and increase the already congested streets in the town. The development would have serious detrimental effects on the wildlife and fauna of the area including the nearby pebblebed heaths

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

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

Full name: Vicky Anderson

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and

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

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

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

Full name: Richard Peter Stuart Andrews

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

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

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

Full name: Mark Ian Andrews

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to

PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

* The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to

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

ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

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

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

Full name: Mr Mark Andrews

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would

be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

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

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

Full name: Phil Ashworth

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point for EXMOUTH-20 is significantly closer to BS than Exmouth. The new residents would overwhelm the infrastructure and amenities and would lead to BS and Exmouth “joining up” contrary to Policy OLO5 of the local plan.

An alternative site could well be contrary to PB01. A development would harm the heritage assets. Inc the grade 2* St John in the wilderness church contrary to he02 It would contravened the wildlife sites in OL01 and destroy wildlife.

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

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

Full name: Christopher Baker

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Not an appropriate site. Contravening existing policies eg PB01. OL01. OL09

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

Full name: Cathy Balcer

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Full name: Dr Claire Balmer

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Although I support the need to build AFFORDABLE housing in Devon, I object to the proposed sites Exmo_17 and Exmo_20.

The primary reason is because infrastructure and safety for current residents has not been addressed and must be before ANY new building plans are approved in and around Exmouth. These include (but are not limited to) clean water supply, flood risk, road use and social services. Significantly, these sites will directly impact the traffic and therefore safety of already overused adjacent roads which both are limited to single lanes at points.

Furthermore, both sites will impact local protected land and I feel there are more appropriate sites available. The beauty of the area must be maintained (and a precedent of destructive and ill thought land use throughout Devon must be prevented) because this is our unique selling point and what many local businesses and livelihoods rely on.

Full name: Richard Banfield

Other party name (if relevant): Rosemary Banfield

Proposal:

5. Development in the Towns and Villages

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

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

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

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

1. The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICYPB01 of the local plan and not in accordance with the mitigation strategy.

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

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

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

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

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

7. Serious sewage and drainage issues with South West Water are already having very detrimental effects on the amenities (beaches etc) and tourism / small businesses in Exmouth and Budleigh, which can only be exacerbated by this development.

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

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

Full name: Simon Barnett

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents including myself said no, but despite this, EDDC voted to remove that protection. Why? Who do you represent if not the people who voted you into office? As you well know National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Is this what you really want? I don't nor do most residents in Exmouth. > Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. They never do. Indeed I don't believe that there really is such a thing as an affordable home. It is a concept only that is never attainable. In addition the proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. Incidentally that very landowner states on its website that they are strongly in favour of preserving the countryside and yet they have sold large areas of beautiful countryside in and around Exmouth to house builders. Money is obviously a higher priority I suggest than preserving the countryside despite what their website says. > A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a cycle path used regularly by myself and my grandchildren as well as a many others. Have any Councillors taken the time to see how well used it is? > I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future

generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17. > The only saving grace for the residents of Exmouth is the sea. We are blessed with having water on 2 sides of the town. Were the water not there EDDC and the developers would no doubt be covering that area in concrete as well. > EDDC have got to start looking at the infrastructure. There is no extra provision water/sewage, healthcare, roads etc. The list is endless. Where is your planning? Frankly it is non existent. Rolle Medical Practice in Exmouth is the largest GP practice in the town. Approximately 23 doctors. If all goes well you can get an appointment to see a doctor in 3 weeks. This is going to increase with all of the McCarthy and Stone residents that have recently arrived in Exmouth and what will 400-500 new houses at Exmo_17 and their residents do for the waiting lists at GPs and dental practices? > EDDC you need to start planning for these issues and not just give the green light to any landowner and developer that wants to make money. It is not too late.

Full name: Chris Barraclough

Proposal:

5. Development in the Towns and Villages

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: As a regular user of the sea who has been unable to use this facility due to sewage pollution, I am very concerned that any increase in property developments will overload our already unsatisfactory sewage system. I have no confidence that South West Water can deliver the necessary increase in capacity. Whilst I appreciate increased housing is required, this should not be undertaken until waste water, including sewage systems have been updated to meet increased needs. Existing pipework is too old and regularly fails leading to the sewage issues we have seen of late. We pride ourselves on being a tourist location, but we are seen as a sewage danger area in other areas of the country. I moved back to Exmouth from Sussex following my retirement. People I know in Sussex have stated they will not consider Exmouth as a holiday destination due to our sewage issues.

Full name: graham barter

Proposal:

5. Development in the Towns and Villages

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

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

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

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

There would appear to be no salient consideration of the increase this development would make on the surrounding villages and towns, especially Budleigh Salterton. No plans for the impact on the infrastructure of Budleigh which is over stressed at the moment. Equally the impact on the countryside and habitats would be considerable

Full name: graham barter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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(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.: trythisonegeb1@gmail.com

Full name: Alison Bass

Proposal:

5. Development in the Towns and Villages

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

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

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

Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supported foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

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

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

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

Full name: Oliver Batson

Proposal:

5. Development in the Towns and Villages

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

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

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

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

3(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 Exmou_20 from local plan

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

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

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

Full name: Oliver Batson

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Exmo_20 site seemed to be allocated without consultation - I tried to look online and the maps said it was not allocated - however it became apparent that it was allocated despite the maps being wrong and also not being consulted under regulation 18. No public or strategic planning objections were therefore permitted until it was too late. It did not therefore comply with chapter 5 - policy SD01 PCPA 2024 where it said it was not achievable or suitable at the HELAA stage 2.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo20 Site from the local plan as there has not been correct or legal consultation leading up to it

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Please see sheet attached as this box will not allow me to scroll down. Exmo_20 is in total conflict with the following local plan policies under Chapter 5 SD01 - SP01, TR01, TR03 & paras 11.2, 11.6, 3.34 and 2.6. for the following reasons: As a young car driver I drive the B3179 daily - it is the most dangerous road in the area with sharp bends and if a bus / lorry comes in one direction there is not enough room for a lorry and a car. You absolutely take your life into your own hands turning out of any minor existing road (none of which are maintained by Highways) onto the B3179 (St Johns Road, Hulham Road, Dalditch Lane, Inner Ting Tong) and to put thousands more cars out onto that would severely endanger young lives. Quite often when passing the archery club there

have been large queues out onto the road and near crashes. Another entrance there would cause absolute chaos.

It is absolutely ridiculous to suggest that anyone would walk to that site. I live on Dalditch Lane near the site and it is impossible to walk anywhere due to distance, danger, lack of footpaths or cycleways and lighting. That is before you even consider the steepness of the site and its distance from any shops or useful services. Bus services are appalling- it regularly takes me over 3 hours to get back from Exeter to Budleigh Salterton due to cancelled or overcrowded buses and to put more buses on the B3179 will add to the dangerous road. The site is neither connected to Budleigh or Exmouth and is a totally isolated site without any of its own services and not large enough to warrant own shops, surgeries etc. This would mean all the car drivers in that development (and it would be impossible to live there without a car) will be driving many extra miles to get to shops and services as opposed to other sites which are situated on the edge of existing towns.

]] Exmou_20 is in total conflict with the following local plan policies under Chapter 5 SD01 - SP01, TR01, TR03 & paras 11.2, 11.6, 3.34 and 2.6. for the following reasons: As a young car driver I drive the B3179 daily - it is the most dangerous road in the area with sharp bends and if a bus / lorry comes in one direction there is not enough room for a lorry and a car. You absolutely take your life into your own hands turning out of any minor existing road (none of which are maintained by Highways) onto the B3179 (St Johns Road, Hulham Road, Dalditch Lane, Inner Ting Tong) and to put thousands more cars out onto that would severely endanger young lives. Quite often when passing the archery club there have been large queues out onto the road and near crashes. Another entrance there would cause absolute chaos.

It is absolutely ridiculous to suggest that anyone would walk to that site. I live on Dalditch Lane near the site and it is impossible to walk anywhere due to distance, danger, lack of footpaths or cycleways and lighting. That is before you even consider the steepness of the site and its distance from any shops or useful services. Bus services are appalling- it regularly takes me over 3 hours to get back from Exeter to Budleigh Salterton due to cancelled or overcrowded buses and to put more buses on the B3179 will add to the dangerous road. The site is neither connected to Budleigh or Exmouth and is a totally isolated site without any of its own services and not large enough to warrant own shops, surgeries etc. This would mean all the car drivers in that development (and it would be impossible to live there without a car) will be driving many

extra miles to get to shops and services as opposed to other sites which are situated on the edge of existing towns.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmou 20 site has not gone through the correct process of a 'duty to co-operate'. It does not comply with PCPA 2004 section 33A. It was not deemed suitable or achievable at the HELAA stage 2. It was not preferred or a second choice site and has not gone through the correct consultation processes.

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

Full name: Oliver Batson

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The site Exmou_20 was not deemed suitable for development but then quickly became allocated while maps still showed online that it was not deemed suitable or achievable. it was not then considered when Reg 18 discussions took place. It has not therefore been in accordance with NPPF chapter 3 and is not legally compliant

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmou_20 from local plans

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmou_20 allocation is in conflict with policy TR03 (SDS01) and paragraph 11.2 . Being a new car user access onto the B3179 from existing routes is lethally dangerous - including Hulham road,, St Johns Road, Dalditch Lane and Inner Ting Tong. The development of this site will put thousands more cars onto the B3179 which is busy and dangerous and cannot sustain any more traffic. existing small lanes onto the B3179 are not maintained. The site would cause longer journeys into Exmouth and Budleigh from this site. More buses on the main B3179 will make this narrow road even more dangerous. Existing transport services are totally inadequate - today it has taken me 3.5 hours to get from Exeter into Budleigh with buses full or cancelled. Living close to this site in a rural area I have never been able to walk or cycle to shops or town due to distance - steepness of the roads and also because the roads are really dangerous.

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.: Take out Exmou_20 from consideration in the local plan

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I live less than half a mile from the proposed development Exmou_20 - I am on all social media and did not hear about this mass development proposal. When I tried to look into it nothing was showing online that this was being proposed for development. I feel this therefore has not complied with the duty to cooperate under PCPA 2004 section 33A

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

Full name: Liz Beard

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The Services and infrastructure of Budleigh(high Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to of the local plan coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan An alternative site of Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the site selection Methodology & POLICY PB01 of the local plan and not in accordance with the mitigation Hierarchy to select avoidance over mitigation. Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade 11* listed church, eroding the attractive rural setting for worship & burials which currently exist. This is contrary to POLICY HE02 Exmo_20 would have a detrimental effect on this open countryside and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness, and dark skies", which is contrary to POLICY OL01 Exmo_20 development would be in conflict with the strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors contrary to paragraph 13.23 of the local plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site contrary to Paragraph 13.9 Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the habitats Regulations Assessment (30.01.25) states that there is currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access is proposed opposite the SAP/SPA. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe

Brook through Exmouth., which is already under additional pressure from climate change. This is in conflict with POLICY ARB01B. Exmo-20 would increase the need for car travel, contrary to Figure 7-the energy hierarchy, and increase traffic congestion, in conflict with Paragraph 11.2 The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to paragraph 11.6 It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

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

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

Full name: Ashley Beare

Proposal:

5. Development in the Towns and Villages

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

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

Additional housing especially affordable housing, ideally for rent as affordable to buy isn't in reality for many is urgently required. Any additional commercial premises used for employment is also a bonus

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.: Possibly a little large at projected 700 homes but do nothing isn't an option. I understand that many are objecting on environmental grounds but within reason desperately needed homes must come first

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

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

Full name: Becky

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent pebblebed heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the site selection methodology and policy PB01 of the local plan and not in accordance with the mitigation hierarchy to select avoidance over mitigation.

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

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

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

Development of EXMO_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B.

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

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

Remove or significantly reduce the size of EXMO_20 from the local plan. Do not access the site via Southern Wood. Access via Sourthen Wood onto Meadow View Road would be absolutely inappropriate. Meadow View Road is already fairly congested with cars parked on the road and an increase in traffic from the proposed development would cause mayhem along this road, specifically at commuting times and especially when trying to access dinan way. It would be an accident waiting to happen. As this area is predominately a family area, lots of children play on their bikes and run around freely.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a young teacher who is actually looking to buy their first property in Exmouth. However, I do not agree with this current plan.

Full name: Linda Bellamy

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Land to the South of Littleham (Exmo_17) - I object to this as traffic already bad at liverton roads bad we have sewage problems not enough doctors dentist and secondary school this is insane I live in littleham we don't want more cannot get out if Capel lane now without more cars added to it it's a disgrace

Full name: Elise Belsher

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Full name: Gerri Bennett

Proposal:

5. Development in the Towns and Villages

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at EXmo 20 should be located at an alternative site where Pebblebed Heaths would not be harmed. Developing EXmo 20 is contrary to policy PB01 of the local plan and thus is not in accordance with the mitigation strategy. EXmo 20 would entirely destroy the tranquility, wildness and dark skies of the countryside contrary to Policy OL01, Developing this area would isolate and fragment habitats destroying wildlife corridors (paragraph 13.23 of the local plan). Veteran trees and species rich hedgerows would be destroyed across the site. It would increase traffic and the need for car travel and is unsustainable development. It is isolated and people would need to travel more than 800m to access services. It is closer to Budleigh Salterton services than Exmouth making it a first choice rather than Exmouth putting pressure on all the local services there. This would also be contrary to policy OL05 of the local plan.

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

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

Full name: Lynda Benson

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development will add at least one car per property creating further build up of traffic on the B3179 travelling to Exeter, Exmouth and Budleigh Salterton. It will lead to coalescence of Budleigh Salterton and Exmouth neither of which has the infrastructure to absorb such an influx of permanent residents and of course is contrary to POLICY OL05

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Unless the schools, hospital, roads, parking, roads and services are significantly improved I cannot support such a large development which will cause general havoc to existing residents. Our sewers already cannot support the influx of visitors in the holiday season causing sewage to be closing our beaches (surely the reason to be here) and I would expect these important services to be made ready before any further developments can be considered. Furthermore the wildlife would suffer, and the pebble beds are supposed to be protected. How can this even be on the table?

Full name: Christine Bentley

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This isolated site is nearer Budleigh Salterton than Exmouth. BS is far smaller than Exmouth & has very limited services as it serves only 5000 people Schools/ Health Services, Parking Infrastructure -sewage ALREADY consistently being dumped in sea at BS from both towns. Access via mere winding country lanes. Damage to Pebblebeds with rare flora & fauna -some protected species 9SSSI/SAC/SPA/NNR Saxon settlement St Johns area. Flood risk known & in conflict with AR01B Contrary or conflicting with Policies OL01,(dark skies) OL09, PB04, (habitats) Conflicting with Strategic Nature Area 368 - contrary to Para 13.23 and 13.9 of the Local Plan MAIN ACCESS opposite SAC/SPA Too dangerous for walking or using 2 wheel vehicles safely on these narrow, undulating, winding, country lanes -so more bad accidents and far more traffic just to reach & leave the site contrary to Para11.2 & 11.6 Local plan and POLICYTR01. Say 2 cars per house - school runs -the lanes will be of non-moving traffic for hours per day

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from Local Plan Reduce size at worst. No access to be from B3179 or SouthernWood Revert to previous proposla

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

Full name: Wendy Blackham

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The neighbourhood plan was drawn up & agreed. These sites are not on it. This is a green wedge

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.: Do not allow any more building in Lympstone and land in Lympstone that falls under Woodbury.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Lympstone has been picked on by EDDC for some reason to over build. This is a VILLAGE & EDDC are hell bent on making it a town.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

The neighbourhood plan has been ignored by EDDC. The green wedge has been ignored by EDDC. Lympstone Parish Council have said no more building, the residence of Lympstone have said no more building. EDDC said sod you, we will over build and take away any village feel Lympstone has

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

Full name: Lesley Blackmore

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Full name: Paul Blackmore

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Full name: Edward Blackmore

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I believe Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is about 4 miles by car from Exmouth town centre and therefore detached from it; so it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible as there is not land all around it, and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable. Further more I beleive the plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

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

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

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

I believe Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is about 4 miles by car from Exmouth town centre and therefore detached from it; so it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible as there is not land all around it, and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I believe the plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

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

Full name: Julie Bladon

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Full name: Steven Blakeley

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Full name: Bernie Board

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To remove Exmo20_from the local plan

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

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

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

Full name: Nicola Bond

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Full name: Dr. Chris Boorman

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I cannot understand why EDDC should be contemplating this site when it is situated next to the internationally designated Pebblebeds Heath Commons, bearing in mind the following strategy is part of the current EDDC 2013-2031 Local Plan

The Exe Estuary and Pebblebed Heaths 18.47 The Council has formed the view, after receiving advice from Natural England (the government agency responsible for the promotion of wildlife), that there is a risk that residential development (and occupants/their pet) could impact on East Devon Heaths SPA or the Exe Estuary SPA boundary. This advice is reinforced by follow-on work on Habitat Regulations assessment. A particular concern raised by Natural England is that new housing development may have an adverse effect on the SPAs; for example an increase in recreational activity and dog walking may disturb the ground-nesting birds on the Heaths or roosting or feeding birds on the Exe Estuary. Predation of birds by domestic cats is already identified as a particular concern on the East Devon Pebblebed Heaths and any increase in the number of homes could be expected to increase in cat numbers and further exacerbate adverse impacts/predation. To help preserve the integrity of the East Devon Pebblebeds Heath, specifically on account of the impacts of domestic cats through bird predation, new dwellings will not be allowed on or within 400 metres of the Pebblebed Heaths Special Protection Area.

In addition:

1. The main access point is closer to Budleigh Salterton than Exmouth - making Budleigh its most convenient and accessible town. Unfortunately, Budleigh does not have the infrastructure (for sewage, doctors, schooling, or roads) to support such a massive influx of residents. This is contrary to POLICY OL05 of the local plan.

2. Exmo_20 would cause harm to the heritage assets of this Saxon / Norman . Medieval settlement - most significantly St John in the Wilderness Grade II listed church - contrary to POLICY HE02

3. The sewage infrastructure of Budleigh Salterton is woefully inadequate for the existing housing needs. Adding to this will cause significant additional issues.

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

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

Full name: Jo Bowen

Proposal:

5. Development in the Towns and Villages

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to voice serious concern about any building in and around the proposed Exm-20 site. I have lived in Exmouth since 1966 and spent my professional life as a medical doctor. I now live in Budleigh (Simcoe House, 8, Fore St hill EX9 6PE) .

This plan Exm-20 is damaging for any who now call this place home. The major asset of outstanding natural / traditional farming landscape overlooking the bay and river is a really vital and treasured resource. It lies closer to Budleigh than Exmouth but affects each of these closely related towns which are both already struggling to preserve their individuality and residents' welfare.

Our rural identities here are made up of these habitats across generations. These include the wildlife and any other rural multi sensory experiences they provide - no offset, however tailored, will make up for these if lost to us.

Additionally, St John's in the wilderness is a vital spiritual resource needing its unique green environment in which to continue its particular valued and deeply historic culture. Once lost it will never be regained for future generations here. A gem will effectively be smashed .

Locals deserve to live in a place which is invested with the distinct patterned rural east Devon landscape they have already chosen or grown up with, often across many generations. Many of these people are poor in multiple social or psychological ways and many only rarely leave the area, but they derive a great nourishment from their immersion in old green walkways, views, and the distinct local nature.

The government imperative to build should therefore not entail picking on the most glorious of green farmland compartments between our 2 towns.

Thank you for considering my views, which I know thousands around here share. I also realise you are under enormous pressure to provide human housing. But, please, as I implore, not at a gross rural cost to our identities and well being.

I am copying in my MP and my local town council.

Full name: Jo Bowen

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation and for visitors alike. This is contrary to POLICY HEO. I am a psychiatrist (as well as a local resident) who has witnessed the devastating effect on people of having rural amenities stripped of their rural identities. One key part of life here is in core needs of spirituality and connection via this well established (400 years plus) and adored rural space - the church and it's green natural surrounds form part of what makes living here culturally meaningful.

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.: Nil

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

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

Full name: Allen Bowen

Proposal:

5. Development in the Towns and Villages

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

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at ExMO_20 could and should be located on an alternative site where it would cause lessor no harm to the Pebblebed Heaths (SAC/SPA).DevelopingEXMO_20 is contrary to policy PB01 of the local plan and not in accordance with with the mitigation strategy. EXMO_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICYOL01. Developing EXM0_20 would fragment and isolate habitats and destroy wildlife corridors,contrary to paragraph 13.23 of the Local Plan.It would be detrimental to irreplaceable habitats,veteran trees and species rich hedgerows across the across the site, contrary to paragraph 13.9.

The Habitats Regulations assessment (30.01.25) confirms that there is currently not sufficient certainty to rule out adverse effects in integrity in relation to....air quality (East Devon Pebblebed HeathsSAC/SPA). eXMO_20 is in conflict with Policy OL09 and policy PB04. EXMO_20 would have significant adverse effects on St.John in the wilderness grade II listed church and churchyard dramatically altering three leaceful setting for worship which currently exists for the congregation. This contrary to policy HE02. ExMO_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe brook, on a sub soil of heavy clay which makes soakawayls ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through withycombe. This is in conflict with policy ARO1B.

EXMO _20 would increase the need for car travel and increase traffic congestion, in conflict with paragraph 11.2. It is unsustainable development. It is isolated and people

would need to travel much further than 800m to existing key services and facilities, contrary to paragraph 11.6 It is too far and too steep from any town centre for people to use walking or cycling as their choice of transport. This is contrary to policy TR01.

The main access point of EXMO_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High street, Doctor's school, beach etc) would be the obvious choice for residents of EXMO_20. This would lead to coalescence of Budleigh and Exmouth, contrary to policy OL05 of the Local Plan

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

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

Full name: GEORGE BOYD

Proposal:

5. Development in the Towns and Villages

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

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

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

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

EXMO-20 would increase the need for car travel and increase traffic congestion. it is an unsustainable development. it is isolated and people would need to travel much further than 800m to existing key services and facilities. it is too far and too steep from ant town centre for people walking or cycling.

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that the views of local people are given due consideration and decisions are not made in far off places like Manchester.

Full name: Jon Breeds

Proposal:

5. Development in the Towns and Villages

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

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

Full name: Peter James Briggs

Proposal:

5. Development in the Towns and Villages

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

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

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

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

1) It seems that there is only little integration of the development plans for Budleigh Salterton, Exmouth and Woodbury and the increase in traffic that will occur. As I understand the main exit from the Exmo-20 development will probably be opposite the Exmouth Archery Club on the B3179. This road is already busy and one of the main routes through Woodbury to Exeter and the M5. it is lined with mature trees and would therefore be impossible to widen without removing them and also destroying the wildlife that resides in them. The junctions with Inner Ting Tong, Dalditch Lane and St Johns Road are hidden and dangerous when entering onto the B3179. It is recommended that a simulation of the resulting traffic flow be done before proceeding with the development.

2) The proposed development would destroy valuable agricultural land, hedgerows and woodland.

3) Climate scientists predict that we can expect much rainier conditions therefore covering large areas with roads and buildings will result in more flooding and will exacerbate the problems with overloaded sewers in Exmouth.

4) The area is flanked by protected pebble heath, home to rare wildlife and rare ground nesting birds. Increasing the population nearby will not help the protection of this area.

5) The proposal assumes that cycling and walking will be encouraged and so reduce the need for car journeys. Outer Ting Tong is some 400 ft above sea this might promote recreational walking and cycling but certainly not journeys to work, school runs and shopping.

Full name: Ann Maureen Briggs

Proposal:

5. Development in the Towns and Villages

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

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development Exmou2 is not properly integrated with the infra structure required in terms of the transport requirements. The proposal to make the exit onto the B3189 is not sensible. This is already a busy B road with dangerous intersections with western Ting Tong, Dalditch Lane and St Johns Road. The B3179 is already used by traffic from Budleigh Salterton, from Exmouth via the Salterton Road, St Johns Road on route via Woodbury, Clyst St George to the M5 and Exeter. There are also plans for large amounts of house building in Woodbury which will add further amounts of traffic and create congestion. The proposal to discourage car journeys by cycling and walking are not viable, The proposed exit opposite Dalditch lane is over 400 ft above sea level and also 3 miles to Exmouth center. There are many other reasons why the plan is not sound.] Close proximity to pebble heath Overloading the sewage and polluting the Exmouth beach. Budleigh Salterton is closer than Exmouth this will stretch its facilities for example the Doctors Surgery, the Shops and parking.

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 Exmou_20 from the local plan or at least reduce its size. Do not access the site via the B3179

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

Full name: Peter James Briggs

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It seems that there is only little integration of the development plans for Budleigh Salterton, Exmouth and Woodbury and the increase in traffic that will occur. As I understand the main exit from the Exmo-20 development will probably be opposite the Exmouth Archery Club on the B3179. This road is already busy and one of the main routes through Woodbury to Exeter and the M5. It is lined with mature trees and would therefore be impossible to widen without removing them and also destroying the wildlife that resides in them. The junctions with Inner Ting Tong, Dalditch Lane and St Johns Road are hidden and dangerous when entering onto the B3179. It is recommended that a simulation of the resulting traffic flow be done before proceeding with the development. The proposal assumes that cycling and walking will be encouraged and so reduce the need for car journeys. Outer Ting Tong is some 400 ft above sea this might promote recreational walking and cycling but certainly not journeys to work, school runs and shopping.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo20 and do not develop access to B3179

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

Full name: Amanda Broad

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

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

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

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.: hear our concerns

Full name: Mrs Patricia Brooks

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly close to Budleigh Salterton than to Exmouth, making BUdleigh its most convenient and accessible town. The services of Budleigh Salterton would be unable to cope with such an increase in use, particularly the Primary School which already has problems with its use of unsatisfactory temporary buildings, and the Doctors' surgery. Extra traffic in the High Street would also be a problem and also the sewage problem is ongoing. 1500 - 2000 extra people would only make this worse. The sewage problem urgently needs to be sorted out before any more new homes can be considered in this area. Exmo_20 would also have a detrimental effect on this open countryside, eliminating "tranquility, wildness and dark skies" contrary to Policy O101. Exmo_20 would increase the need for car travel, in conflict with Paragraph 11.2

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Greatly reduce the size of Exmo_20 Do not access the site via the B3179

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

Full name: MR JOHN G BROOKS

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I am not qualified to judge if it's legally compliant or not and have therefore put not.

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.: Unable to comment.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Appears way out of scale with up to 700 new houses with unsuitable road links and lack of ability of local services to cope.

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.: Vastly reduce the proposed number of houses.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I am not qualified to answer this as I don't know with whom there is a duty to cooperate, so have said no.

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

Full name: David Brunwin

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo 20 is upstream of Exmouth on the main rainwater catchment area of Withycombe brook. it is on an unsuitable subsoil which makes soakaways ineffective. it would exacerbate the already identified float risk. This is in conflict with policy ARO1B.

The main access point to XO 20 is close to budleigh Salterton. This would put a very significant increase pressure on the services and infrastructure of Budleigh. it would lead to the coalescence of Budleigh and Exmouth, contrary to policy OL05 of the local plan.

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

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

Full name: James Bullen

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Full name: David Buller

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. It currently is NOT in my opinion. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea. If planned development proceeds it will contravene this policy clause.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1 development within Exmouth / Maer Lane STW catchment from the Local Plan. Even if it is addressed by SWW, Ofwat protocols mean that such improvements will not be completed within 8 years. To allow development of objected to locations prior to infrastructure expansion by SWW will knowingly enable, create & add to sewage pollution of Exmouth water courses & beaches.

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

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

Exmouth is currently a town seriously lacking in adequate sewerage infrastructure, evidenced over the last few years by serial instances of ruptures of its sewage network in various locations, and with a demonstrably under capacity local sewage treatment facility, as evidenced by numerous sewage spills occurring from the network in even the slightest of rainfall. The allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan.

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

Remove site Exmo_20 from the Local Plan. The existing sewerage infrastructure in & around Exmouth is creaking. It is critical that it is not placed under additional stress by building a significant number of new homes until it has been upgraded by SWW to sufficient capacity to enable it to operate in an environmentally-compliant manner with confidence. The policy omits any reference whatsoever to the recent well-publicised issues in & around Exmouth concerning sewage treatment. EDDC have issued notice of civil emergency and a vote of no confidence in SWW because of the nationally publicised sewage infrastructure failures that have taken place across Exmouth from 2019 to 2025. To not even acknowledge this issue in the local plan, a matter of serious concern to numerous residents, despite EDDC's clear knowledge of the problems, is an abandonment of good governance & public service by the district council.

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

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: No comment

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

Full name: Lindsay Burge

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

Full name: Sally Burnell

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is much closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services of Budleigh (GPs, school, shops, beach etc) would be the natural choice for residents of Exmo_20. This would certainly lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 for housing allocation should be selected - one which was deemed available and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmouth-20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance the the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade 11* listed church, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

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

Exmo_02 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors, contrary to PARAGRAPH 13.24 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

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

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

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

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

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

Full name: Ruth Burnett

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Development of Exmo_20 on the heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR0B.

Exmo_20 would increase the need for car travel, contrary to Fig 7, the energy hierarchy, and INCREASE TRAFFIC CONGESTION, in conflict with paragraph 11.2. This would be a isolated location providing unsustainable development, as residents would need to travel much further than 800m to existing key facilities, contrary to paragraph 11.6. It is too far from any town centre to use walking (which would also entail walking along a busy roads with no footpaths) or cycling as their choice of transport. This is contrary to POLICY TR01. Exmo_20 would also have a detrimental effect on this open countryside site and the adjacent internally designated wildlife site, eliminating the tranquillity, wildness and dark skies, which is contrary to POLICY OL01.

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

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

Full name: Bruce Burniston

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area.

EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC defied the people's wishes, and voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

This project, if successful would be yet another step in joining the urban areas of Exmouth and Budleigh Salterton. This would be detrimental to the residents and taxpayers of both.

From an environmental point of view, this project would involve the destruction of a large area of oxygen producing, carbon absorbing greenery - FOR EVER and its replacement PERMANENTLY WITH CONCRETE/TARMAC.

There are plenty of houses in Exmouth. The problem with housing supply is the profusion of holiday homes owned by richer people from elsewhere, and occupy for just a few weeks of the year. This is the result of government policies which have made investment in property the only way to preserve capital. And of course, Ministers and MPs, and many senior central and local government officials, make a lot of money out of second and third homes. Also, the larger our town becomes, the larger will be the salaries and allowances the Chief officers of the local authority will feel they should be entitled to. This brings democracy into disrepute and encourages contempt for it. Is this what East Devon Councillors want?

Furthermore:-

Do they want a single conurbation between Exmouth and Budleigh? Do they want the principle of maintaining Green Belts, National Parks and areas of outstanding Natural Beauty to be cast aside for the current government's anti-Countryside political ideology? Do they want to create a precedent for building over whatever stretches of "protected" Countryside are of interest to money making developers? Do they want local services and utilities to be overwhelmed further than they are already? Do they want more faeces in our sea? Do they want more rich outsiders outbidding our young people who want to work and live here? Do they want ordinary citizens to believe that democracy has been taken away from the people and put into the hands of politicians and officials with vested interests, including furthering their own Party ideology regardless? Do they want to cause the ordinary, law abiding, taxpaying local citizens to become disenchanted with local democracy and drive them into the hands of extremists? Do they want to harm the local tourist industry by destroying the very landscape which attracts so many visitors?

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17. It can never, ever be reversed.

Full name: Tim & Gillian Burrows

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo-20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo-20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. Exmo-20 would fragment and isolate habitats and destroy wildlife corridors, contrary to Para 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to Para 13.9.

The Habitat Regulations assessment (30.1.25) confirms that there is 'currently not sufficient certainty to rule out adverse effects in integrity in relation to local air quality' (East Devon Pebblebed Heaths SAC/SPA). Exmo-20 is in conflict with POLICY L09 and POLICY PB04.

Exmo-20 would destroy the 'tranquillity, wildness and dark skies' of the countryside which is contrary to Policy OL01. Exmo-20 would have significant adverse effects on St John in the Wilderness Grade2 listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo-20 is upstream of Exmouth on the main catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmo-20 would increase the need for car travel and increase traffic congestion particularly as the only exit from the site for, possibly, around 1000 cars is onto a narrow B road (madness and makes no sense whatsoever). This is in conflict with Para 11.2 and is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to Para 11.6. It is much too far (and too steep) from any town centre for people to use walking or cycling (there are no footpaths/cycleways along the B3179) as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town - in spite of the well known, and growing, traffic problems in Budleigh High Street. The services and infrastructure of Budleigh (High St, Medical Centre, primary school - these 2 latter services already oversubscribed - and beach) would be the obvious choice for residents from Exmo_20. Quite apart from the obvious traffic and services chaos which could ensue, this would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20 and do not access the site via the B1379 - this would help mitigate the impact as outlined in our objections above. Ideally we would like the whole plan abandoned but, in the absence of such a sensible decision, the main mitigations above would help.

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

Full name: Melanie Burt

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

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

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

Full name: Pamela Burton

Proposal:

5. Development in the Towns and Villages

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

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

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

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

1. South West Water cannot and does not provide adequate sewage systems at the present - they are all overloaded and antiquated.

2. The access road onto the B3179 opposite the archery club - no reasonable or intelligent traffic survey has been carried out. One only has to look at a Bank Holiday Monday with a car boot sale at the Archery Club to observe considerable traffic jams in both directions. Considering 700 houses would probably generate at least 1000 cars the road could not take it. Too narrow, poor quality surface - the road is also used for heavy goods vehicles heading into Budleigh as well as the local recycling centre. Local facilities are inadequate to accommodate an increase in usage. Because of the access people would gravitate towards Budleigh - the current local primary school, which is already over subscribed, will be inundated. The Doctor's surgery, also over subscribed, will not be able to cope. The local chemist, recently reduced to one, is already very busy at any time. Public conveniences are very limited in Budleigh as are car parking spaces. There is no indication of how much of the housing might be for affordable or social occupation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As Exmouth council were congratulating themselves on receiving monies for this planning and Budleigh would get nothing except for the hassle then perhaps Exmouth council ought to take on the problems exiting into Exmouth itself.

Full name: Michael Burton

Proposal:

5. Development in the Towns and Villages

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

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

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

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

1. South West Water cannot and does not provide adequate sewage systems at the present - they are all overloaded and antiquated.

2. The access road onto the B3179 opposite the archery club - no reasonable or intelligent traffic survey has been carried out. One only has to look at a Bank Holiday Monday with a car boot sale at the Archery Club to observe considerable traffic jams in both directions. Considering 700 houses would probably generate at least 1000 cars the road could not take it. Too narrow, poor quality surface - the road is also used for heavy goods vehicles heading into Budleigh as well as the local recycling centre. Local facilities are inadequate to accommodate an increase in usage. Because of the access people would gravitate towards Budleigh - the current local primary school, which is already over subscribed, will be inundated. The Doctor's surgery, also over subscribed, will not be able to cope. The local chemist, recently reduced to one, is already very busy at any time. Public conveniences are very limited in Budleigh as are car parking spaces. There is no indication of how much of the housing might be for affordable or social occupation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As Exmouth council were congratulating themselves on receiving monies for this planning and Budleigh would get nothing except for the hassle then perhaps Exmouth council ought to take on the problems exiting into Exmouth itself.

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

Full name: Christine Bush

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Land at St John's Exmo – 20 Proposing – A Social and community facilities B Around 700 new homes; and C At least 2 Hectares of employment land. Not sound – as not justified – ‘Our chosen strategies and policies should be based on solid evidence and should be the most appropriate when compared to other options we could have chosen.’ This site was considered at the meeting of the Strategic Planning Committee on 3 September 2024 with an officer recommendation not to allocate the site for development with the main issues being infrastructure problems due to securing suitable access, impact on the landscape, impact on the historic environment; particularly centred on the area surrounding the Church of St John in the Wilderness and ecology reasons due to the substantial areas of woodland within the site. Members chose not to accept Officer advice and decided to allocate this site in favour of other sites which were deemed to be suitable for development as recommended by officers in the same report. It was evident from the meeting that Members had not visited the site to assess its suitability for development even though this is one of the largest, if not the largest site allocation in the plan apart from the new town allocations. It was clear from the meeting that the reason for choosing this site was purely political and not substantiated by sound planning reasons to justify development. Access to the site would be a major problem due to the existing road network both within and surrounding the site. The only feasible means of access to the site would be from the B3179 to the northeast of the site, however, this could not be considered to be sustainable given the location and its relationship with the town centre of Exmouth. The site adjoins the East Devon National Landscape and the East Devon Pebble Bed Heaths SSSI to the northeast and a substantial part of the site falls within the 400m exclusion zone for development adjacent to the SSSI. The site is on rising land to the northeast of Exmouth and its development would have a significant detrimental impact on the landscape of the area. The woodlands within the site, some of which are protected by Tree Preservation Orders provide habitat for considerable wildlife and the development of the site would result in

having a significant detrimental impact on the ecology of the area. The Historical core of area surrounding the Church of St John in the Wilderness would be severely impacted resulting in substantial harm to the designated heritage assets of the area. The development is likely to cause problems of flooding due to increased surface water run-off into the nearby Withy Brook. The allocation of employment land within the site appears to be completely ad hoc in terms of its relationship to existing employment sites and would seem to have been included as an afterthought to assist with meeting target allocations. Land for employment uses should be directed to the expansion of existing employment sites in Exmouth; for example, there is available land in the vicinity of the existing business park at Liverton. The Foreword to the Plan states that ‘East Devon is an Outstanding Place’, however, there is a total disregard to that statement in considering this site for development, as it would result in destroying a beautiful part of the East Devon countryside. Proposing this site for development is not sound, as it is not the most appropriate site for development when compared to other options which could have been chosen. The site is not appropriate for development at all and to include the allocation of this site as one of the largest sites for development in East Devon has to be seen as a total disregard for the significant qualities of the area which contributes to making East Devon an outstanding place.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There are other sites which were considered to be suitable for development and were rejected. This site was not considered to be suitable and is not suitable for development. The alternative sites which were deemed to be suitable for development should be considered and included as development sites in favour of this site, which clearly is not.

Full name: Christine Bush

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Land at St John's Exmo – 20 Proposing – A Social and community facilities B Around 700 new homes; and C At least 2 Hectares of employment land. Not sound – as not justified – ‘Our chosen strategies and policies should be based on solid evidence and should be the most appropriate when compared to other options we could have chosen.’ This site was considered at the meeting of the Strategic Planning Committee on 3 September 2024 with an officer recommendation not to allocate the site for development with the main issues being infrastructure problems due to securing suitable access, impact on the landscape, impact on the historic environment; particularly centred on the area surrounding the Church of St John in the Wilderness and ecology reasons due to the substantial areas of woodland within the site. Members chose not to accept Officer advice and decided to allocate this site in favour of other sites which were deemed to be suitable for development as recommended by officers in the same report. It was evident from the meeting that Members had not visited the site to assess its suitability for development even though this is one of the largest, if not the largest site allocation in the plan apart from the new town allocations. It was clear from the meeting that the reason for choosing this site was purely political and not substantiated by sound planning reasons to justify development. Access to the site would be a major problem due to the existing road network both within and surrounding the site. The only feasible means of access to the site would be from the B3179 to the northeast of the site, however, this could not be considered to be sustainable given the location and its relationship with the town centre of Exmouth. The site adjoins the East Devon National Landscape and the East Devon Pebble Bed Heaths SSSI to the northeast and a substantial part of the site falls within the 400m exclusion zone for development adjacent to the SSSI. The site is on rising land to the northeast of Exmouth and its development would have a significant detrimental impact on the landscape of the area. The woodlands within the site, some of which are protected by Tree Preservation Orders provide habitat for considerable wildlife and the development of the site would result in

having a significant detrimental impact on the ecology of the area. The Historical core of area surrounding the Church of St John in the Wilderness would be severely impacted resulting in substantial harm to the designated heritage assets of the area. The development is likely to cause problems of flooding due to increased surface water run-off into the nearby Withy Brook. The allocation of employment land within the site appears to be completely ad hoc in terms of its relationship to existing employment sites and would seem to have been included as an afterthought to assist with meeting target allocations. Land for employment uses should be directed to the expansion of existing employment sites in Exmouth; for example, there is available land in the vicinity of the existing business park at Liverton. The Foreword to the Plan states that ‘East Devon is an Outstanding Place’, however, there is a total disregard to that statement in considering this site for development, as it would result in destroying a beautiful part of the East Devon countryside. Proposing this site for development is not sound, as it is not the most appropriate site for development when compared to other options which could have been chosen. The site is not appropriate for development at all and to include the allocation of this site as one of the largest sites for development in East Devon has to be seen as a total disregard for the significant qualities of the area which contributes to making East Devon an outstanding place.

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

Full name: Iris Buteux

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Full name: Alan Buzzard

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmouth is identified in the local plan as the only Tier 1 settlement designated for significant growth and development.

Among the development sites allocated under SD01, Exmo_20 is the largest, with a proposal for approximately 700 homes, followed by Exmo_17, which plans for 410 homes. Consequently, Exmo_20 represents 48% of the total housing allocation in SD01 for Exmouth, comprising 700 homes compared to 755 homes across all other designated sites.

Given the substantial share of new housing attributed to Exmo_20 and Exmouth's key role in the broader local plan, the allocation of this site represents a major procedural failure. This is particularly concerning as Exmo_20 was previously deemed unsuitable during the HELAA site sifting process. Normally, a failure at an early selection stage would prevent further consideration in later assessments.

Since Exmo_20 was ruled unsuitable at HELAA stage 2, it was not subject to further review:

At HELAA stage 2, Exmo_20 was categorized as "not suitable or achievable."

Due to this designation, it was excluded from Regulation 18 consultations.

However, on 3/9/24, its status changed from "ongoing assessment" to "allocated."

Despite this shift, there was no opportunity for public consultation or review by the Strategic Planning Committee, leaving the evaluation of Exmo_20 incomplete.

It is highly concerning that the largest proposed development within the only Tier 1 settlement has not undergone full scrutiny. This omission undermines the credibility of the plan. Given the scale of the project, its critical role in Exmouth's development, and Exmouth's overall importance in the region, it is essential that the full planning process is properly followed and its conclusions upheld.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The assessment process for Exmo_20 must be fully completed, with its findings upheld. It should not be acceptable to overlook or bypass earlier evaluation stages, particularly when the site has already been deemed unsuitable.

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmouth is identified in the local plan as the only Tier 1 settlement suitable for higher levels of growth and development.

Of the development allocations listed for Exmouth under SD01, Exmo_20 is by far the largest (at around 700 homes), the next largest being Exmo_17, with 410 homes listed.

Exmo_20 therefore represents 48% of the homes in SD01 for Exmouth (700 proposed homes in Exmo_20, and 755 in total being under other development allocations).

Given the share of new homes that this development will provide, and the obvious importance of Exmouth to the local plan as a whole, it seems an obvious failure of process for this site to have been allocated despite the Exmo_20 site previously being ruled out as an unsuitable site in the HELAA site sifting stage.

In no other situation would failure at an early stage of a selection process allow subsequent assessment stages to be sidestepped.

As a consequence of Exmo_20 being ruled out as unsuitable at HELAA stage 2, it was not scrutinised further:

- Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2).
- As a direct consequence of the HELAA stage 2 result, the site was omitted from regulation 18 consultations.
- However, on 3/9/24 the site status changed from 'ongoing assessment' to 'allocated'
- No further consideration or representation was permitted to the public or the Strategic Planning Committee, despite the assessment of Exmo_20 being incomplete.

It is seriously concerning that the largest development in the only Tier 1 site in the Local Plan has not been through the full process of scrutiny and consideration, and this aspect of the plan is clearly not sound in this respect.

Given the size of the proposed development itself, its importance in terms of its intended contribution to the development allocation in Exmouth, and the importance of Exmouth to the area as a whole, it seems obvious that in order for the plan to be sound, the correct process should be followed - in its entirety - and the results of that process respected.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The full process should be completed for Exmo_20, and the result of that process respected. It should not be possible to sidestep or discount earlier assessment stages, including stages which have (already) identified the site as unsuitable.

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable during the site sifting stage (HELAA stage 2). It was never considered a preferred or second choice, which resulted in the site being excluded from the Regulation 18 consultations with Devon County Council.

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan-making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" during the site sifting stage (HELAA stage 2). It was never considered a preferred or second choice, which led to the site being excluded from the Regulation 18 consultations. On 3/9/24, the site was moved from "ongoing assessment" to "allocated," with no further opportunity for public input or representation to the Strategic Planning Committee, despite the assessment still being incomplete.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan-making process has not adhered to NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" during the site sifting stage (HELAA stage 2). It was never considered a preferred or second choice, and as a result, the site was excluded from the Regulation 18 consultations. On 3/9/24, the site was moved from "ongoing assessment" to "allocated," with no further opportunity for public input or representation to the strategic planning committee, despite the assessment not being completed.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy AR01(B). The site is located upstream of Exmouth in the main rainwater catchment area of Withycombe Brook. The subsoil consists of heavy clay, which is impermeable and makes soakaways ineffective, resulting in the land often being waterlogged. Developing this steep site would significantly worsen the already identified flood risk, particularly affecting the lower-lying land at the bottom of the site and extending down through Withycombe.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land designated for housing but also the 400m buffer zone adjacent to the Pebblebed Heaths, effectively designating this land as suitable for development. While housing cannot be built within the buffer zone, its inclusion within the settlement boundary makes it available for other types of development. This contradicts the precautionary approach, as the plan does not adequately safeguard against the potential adverse effects of recreational use and other activities on the Pebblebed Heaths.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy OL05. The main access point to Exmo_20 is 4 miles from the center of Exmouth and only 2.2 miles from the center of Budleigh Salterton, making Budleigh much more accessible for the development. The access route to the site naturally leads toward Budleigh Salterton High Street, while reaching Exmouth requires traveling twice the distance and going around the edge of the town. The High Street, doctor's surgery, primary school, beach, and other services in Budleigh would be the most accessible and obvious choices for Exmo_20 residents. Although Exmouth and Budleigh are currently distinct in terms of functionality, this development would merge the two, with residents living in one town but relying on the services and infrastructure of the other.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy HE02. A development of this size surrounding St. John in the Wilderness Church (Grade II* listed) would have significant negative impacts on the church and churchyard's remote and tranquil surroundings, greatly altering the peaceful setting for worship that currently exists for the congregation.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy OL01. The site is notable for its dark skies, tranquillity, and sense of wildness. In addition to light pollution from the housing development itself, the main access point at the B3179, directly opposite the SPA/SAC/SSSI, would lead to a significant flow of car headlights, disrupting the darkness across the entire site and shining directly onto the Heaths as vehicles leave the site. The area surrounding St John in the Wilderness church is known for its dark skies and strong sense of remoteness and tranquillity, creating a 'wilderness' atmosphere that is integral to the Grade II* listed church. This setting would be negatively impacted by the encircling housing development, regardless of any buffer zone.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines ‘irreplaceable habitat’ as habitats that are technically very difficult or take a significant amount of time to restore, recreate, or replace once destroyed. Exmo_20 will result in the loss of irreplaceable habitats, including a large number of mature trees, many of which exhibit signs of veteranisation. These trees provide unique microhabitats, and their loss cannot be simply mitigated by planting new trees. Additionally, Exmo_20 contains many long-established hedgerows, which are of considerable length. These trees and hedgerows have high intrinsic biodiversity value, offering vital habitats and wildlife corridors. Although efforts can be made to leave space around them, the degradation and fragmentation of these habitats is unavoidable. Nightjars, a qualifying species of the East Devon Heaths SPA, are known to fly up to 7km from nesting sites to feed at night. The loss of foraging habitat or disruption of their feeding routes could undermine the conservation objectives of the SPA. Exmo_20 also lies within an identified ‘Strategic Nature Area’ (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at linking existing wildlife sites and extending habitats. This area provides essential connecting habitats and wildlife corridors between the Pebblebed Heaths to the north and the woodland to the south and beyond, all of which would be negatively impacted by the development of Exmo_20.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 13.23. It is located within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, which is part of the Local Nature Recovery Strategy designed to connect existing wildlife sites and extend habitats. This area provides important connecting habitats and wildlife corridors between the Pebblebed Heaths to the north of the site and the woodland to the south and beyond, all of which would be negatively affected by the development of Exmo_20. Nightjars, a qualifying species of the East Devon Heaths SPA, are known to fly up to 7km from their nesting sites to feed at night. The loss of foraging habitat or disruption of their feeding routes could undermine the conservation objectives of the SPA.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 2.10, objective 8. It will negatively impact the natural environment and lead to the loss of significant biodiversity, both on-site and in the adjacent SAC/SPA/SSSI.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy PB04. The Habitats Regulations Assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects on integrity regarding air quality (East Devon Pebblebed Heaths SAC/SPA)."

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy OL09. The Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects on integrity regarding air quality (East Devon Pebblebed Heaths SAC/SPA)." This is because the primary access to Exmo_20 is via the B3179, which would direct a large amount of additional traffic along the boundary of the Pebblebed Heath. At peak times this could result in additional stationary or slow moving traffic along this boundary, exacerbating the problem further.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy PB01 and does not align with the mitigation strategy. This development could be situated on alternative sites that would result in less or no harm to the Pebblebed Heaths (SAC/SPA).

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development, or one that allow the area to retain its existing charm or character. It is a 'comprehensive development scheme' within a rural part of East Devon adjacent to areas of outstanding natural beauty.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy TR03 and Figure 7 in the Local Plan. Due to the site's limited access, the development would result in a high number of vehicle movements just to reach services in Exmouth and neighboring settlements via the B3179. Given the steep topography and remote location of the site, walking or cycling routes would offer only limited alternatives to driving. The Local Plan highlights that congestion is a major issue in Western East Devon, and since this site has no direct access to Dinan Way or the A376, the resulting vehicle traffic will be forced onto rural B roads, which are already known to be congested and substandard.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 3.34. Despite being a tier 1 settlement, Exmouth lacks sufficient infrastructure and services to support its current population. Even if the proposed development contributes financially to infrastructure improvements, it will not provide an additional doctor's surgery or dentist, both of which are already inadequate for the existing population. Similarly, it will not offer another secondary school—over the past 3 years, many children have had to attend secondary school in Cranbrook due to a lack of capacity at Exmouth Community College. Additionally, the existing sewerage system in Exmouth is so inadequate that sewage is regularly discharged into the sea, often leading to beach closures for swimming. The town's sewerage issues have been reported on national news multiple times, highlighting the scale of the problem.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 11.2. It will increase travel demands and require cars to take longer routes. Housing is proposed at the southern end of the site, while the main vehicular access point is located at the far northern edge, next to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone around the SAC/SPA/SSSI, no housing is allowed within the top 400m, meaning there will be a minimum 0.5km drive just to reach the housing from the site entrance. This would result in at least 1km of driving within the site every time residents leave or return home. Furthermore, from the B3179 site entrance, drivers will need to travel a 4.0-4.3 mile route to reach Exmouth town center. Exmo_20 would thus increase travel needs, leading to more car journeys and longer distances traveled.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 contradicts policy TR01. Walking or cycling will not be the preferred transport option for residents to access shopping, work, school, etc., due to the significant distance. Research cited in the Local Plan indicates that most people prefer to walk if their destination is within 0.5 miles, that cars become the dominant mode of transport beyond 1 mile, and that walking trips beyond 2 miles are rare. Exmo_20 is much farther than 0.5 miles, or even 1 mile, from essential infrastructure and services, making walking or cycling an impractical first choice. Even with the addition of walking routes, cycle paths, or public transport, the steep local terrain, frequent wet / windy weather and the distance to essential services will not reduce the number of car journeys this development will generate. Additionally, it will be challenging for those without access to a car, leading to social exclusion.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 11.6. It is a 'larger' development, and the majority of the site is located more than 800 meters (about a 10-minute walk) from any existing key services and facilities. With no plans to provide substantial key services on-site, residents will likely need to drive over two miles (via the B3179) to reach these services in Exmouth or nearby settlements.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 contradicts policy SP01. While Exmouth is a tier 1 town, Exmo_20 is located 4 miles by car from the town center and is physically separate, meaning it cannot be considered part of Exmouth's development area. Exmouth is entirely unsuitable for significant further growth. Situated on a peninsula between the River Exe and the coast, the town center lies at the southern tip, limiting development in key directions. Given the extensive existing development already spread far from the town center, any new development would be closer to neighboring towns and villages, rather than being within Exmouth's core. Therefore, any development in this area would be too distant from the town, making it an unsustainable location.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

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.: Remover Exmo_20 from the local plan

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy HE02 -The remote and tranquil surroundings of the church and churchyard of St. John in the Wilderness Church (grade II* listed) will be significantly adversely effected by a development the size of Exmo_20 surrounding it. This will drastically alter the peaceful setting for worship which currently exists for the congregation.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to significant light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. Exmo_20 will cause loss of irreplaceable habitats. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". The site has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond. All of these would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. Both on site and on the adjacent SAC/SPA/SSSI there will be adverse affects on the natural environment, and result in the loss of much biodiversity.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_2- from Local Plan

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is because the main access to Exmo_20 is into B3179, which would send traffic right along the boundary of the Pebblebed Heath.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. There are alternative sites available for this development that would cause much less, or no, harm to the Pebblebed Heaths. (SAC/SPA).

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; This is a 'comprehensive development scheme' within a rural part of East Devon. Exmo_20 is currently open countryside, and this is not 'modest' development.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement, Exmouth does not have sufficient infrastructure and services for the existing population. Doctors, Dentists, Schools and the sewage waste system would all be incapable of servicing the increased population size. Even should the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither does the proposal provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision. Exmouth Community College is already at capacity with the current population and even with cranbrook secondary school, would be insufficient to support the population's educational needs. The existing sewerage system in Exmouth is currently so inadequate that sewage is discharged into the sea on a very regular basis and the beach is regularly closed for swimming. Exmouth's problem with sewage has been featured on national news several times, highlighting the scale of the problem it has. It does not need to increase the scale of this problem with no plans to reduce the problem.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will inevitably increase travel needs, and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main access point for cars is at the very northern edge of the site, right next to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted at all within the top 400m of the site, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would mean you were driving a minimum of 1km 'on site' for every journey off site and back. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy TR01. People will not choose walking or cycling as their first choice of transport, as it is too far for most people to access school, work, shop quickly and conveniently. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore the idea that people will walk or cycle as first choice of transport is unrealistic. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography in addition to the distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. Most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities, and it is classified a 'larger' development . There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements, such as Budleigh Salterton.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360 degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

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

Full name: Margaret Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High St. Doctor's school, beach etc) would be the preferred choice of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmp_20 for housing allocation should be selected, one which was deemed available and suitable in HELAA. Exmo_20 would cause harm to the adjacent Pebbled Heaths (SSSI/SAC/SPA/NNR) due to Exno_20 being a supporting foraging habitat. Developing Exmp_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to heritage assets, most signifvantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICT OL01. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity, This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase in traffic congestion, in conflict with Paragraph 11.2. The isolated location is unsuitable for development as people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far and too steep from any town centre to use walking or cycling. as their choice of transport and too dangerous considering the inevitable increase in traffic on narrow roads. This is contrary to POLICT TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

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

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

Full name: Gavin Callow

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The present infrastructure and facilities are insufficient to support the proposed developments which are out of proportion to the present population. The impact on Budleigh Salterton would be particularly severe through increased traffic, pollution, flood risk, noise and pressure on already overstretched medical facilities, amenities and schools. This large scale development would almost certainly damage the local ecology and environment irreversibly.

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

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

Full name: Patrick Camp

Proposal:

5. Development in the Towns and Villages

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

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

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

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

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. ? An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

? Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. ? Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. ? Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. ? Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would

exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. # Closures and additional delays on the B3179 during construction phases and thereafter will have a crippling effect on the commercial survival of Budleigh Salterton high street shops, that depend heavily on visitors during the summer months. There are already too many vacant shops since the covid crisis and we need to encourage, not deter, holiday visitors to the town. Therefore the B3179 must not be closed or restricted as a consequence of Exmo_20.

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

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

Full name: Neve Campbell

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

- Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HEO2.

- ?Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation

to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

- Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

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

- Do not access the site via the B3179
- Do not access the site via Southern Wood " Revert to Exmo_20b as previously proposed.

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

Full name: Christopher Cant

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh than Exmouth. This undermines the settlement hierarchy a joining of Budleigh and Exmouth contrary to policy OL05 of the local plan.

There needs to be direct road links from Exmo_20 to Brixington and Exmouth.

An alternative site for Exmo_20 should be selected because the present plan would cause harm to the adjacent Pebblebed Heaths. Allocating Exmo_20 is contrary to the HELAA.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Church eroding the attractive rural setting for worship and burials.

Exmo

-20 development would be in conflict with POLICY OL01 by destroying the dark sky in the area, and with the Strategic Nature Area 368 fragmenting and isolating habitats contrary to Paragraph 13.23 of the Local Plan.

Exmo_20 is also in conflict with Policy OL09 and PB04. The main access point is opposite the SAC/SPA.

Exmo_20 would increase the need for car travel along the B3179 unless access is provided by a bus route directly from Exmouth.

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

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

Full name: Jo Cant

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Winderness Grade II listed church, eroding attractive rural settling for worship and burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies" which is contrary to POLICY OL01

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors, contrary to PARAGRAPH 13.23 of the local plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the habitats Regulations Assessment (30.01.25) states that there is currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed heaths SAC/SPA) such that the Plan fails the integrity test. The main access proposed is opposite SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, which would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would

need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Remove Exmo_20 from the Local Plan. There is no provision for improving the infrastructure especially sewage arrangements. What about Doctor's surgeries, schools etc. We do need more affordable housing but Exmo_20 feels to be too isolated and will make everyone there dependent on cars for transport.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jo Cant

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is much nearer to Budleigh than to Exmouth making Budleigh the most convenient town for the new residents. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to policy OL05 of the local plan.

An alternative site should be selected that is deemed available and suitable on the HELAA. Exmo_20 would cause harm to adjacent Pebblebed Heaths (SSS1/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to HELAA, the site selection Methodology & Policy PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Full name: jon carr

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
increase car travel and congestion. isolated place. too far from town centre to walk or use cycles.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Elene Carroll

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: N/A

Full name: Nina Kathryn Cartwright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of these irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Nina Kathryn Cartwright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ralph Cartwright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by new trees planting. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ralph Cartwright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and much of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ralph Cartwright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Tricia Cassel-Gerard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor’s, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Fanchea Catton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed housing allocations in Exmouth ... A town currently with insufficient sewerage infrastructure, demonstrably broken sewage network and demonstrably under capacity of the sewage treatment facility so without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove site Exmo_20 from the Local Plan The policy does not take into account the already acknowledge failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Peter Chadwick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Stop

Exmo_20

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.
- Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.
- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.
- The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to... air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

- Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.
- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B.
- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1.
- The main access point

of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

- Reduce the size of Exmo_20
- Do not access the site via the B3179
- Do not access the site via Southern Wood
-

Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Gill Chadwick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Stop

Exmo_20

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.
- Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.
- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.
- The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to... air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

- Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.
- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B.
- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1.
- The main access point

of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

- Reduce the size of Exmo_20
- Do not access the site via the B3179
- Do not access the site via Southern Wood
-

Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lucy Chadwick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Stop

Exmo_20

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.
- Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.
- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.
- The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to... air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

- Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.
- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B.
- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1.
- The main access point

of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

- Reduce the size of Exmo_20
- Do not access the site via the B3179
- Do not access the site via Southern Wood
-

Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Janice Chaldecott

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach, amenities, etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like personally to hear the debate - pros and cons. Democratic principles.

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: On page 13, point 13, the Connectivity and Transport section aims to reduce reliance on car use, increase walking and cycling, and minimize impacts on the local road network to reduce congestion. However, the development of site Exmo_20 will not achieve these goals. The site is on a steep slope from North to South, effectively splitting it into two due to access restrictions. The main access point for this large development is onto the already congested B3179, which has known congestion issues¹.

Residents will not walk for their main shops, doctors, dentists, etc., as the main access point is over 4.2 miles from the town center². Additionally, due to the site's size, the majority of residents will have to travel nearly 0.5 miles just to reach the main access point². This makes the site unsustainable and it should be removed from the Draft Local Plan.

The main access to the site is significantly closer to Budleigh, making this the more accessible and convenient town. The services and infrastructure of Budleigh are unsatisfactory to meet the needs of a growing population. This would lead to a coalescence of Budeigh and Exmouth. Similarly the increase in traffic flow would bombard Woodbury, an already dangerous and congested road.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Remove Exmo_20 from the plan.

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Incorrect Map: The map on page 326 incorrectly includes your homes, the Grade II* listed church, and the caravan park within the shaded area for the Exmo_20 development. This issue has been raised multiple times with EDDC, including with the Chair of the Strategic Planning Committee and planning officers. The correct map, shown in blue within the Reg 19 evidence, should be used instead¹.

HELAA Report Discrepancies: The HELAA report from November 2022 lists several sites, including Exmo_20, as "not suitable or achievable," which contradicts the February 2025 Sustainability Appraisal Report's assessment of these sites as suitable, available, and achievable³².

Conflict with Policies: The development of Exmo_20 conflicts with various policies, including:

POLICY OL01: Adverse effects on tranquility, wildness, and dark skies¹. POLICY PB04: Impact on air quality affecting East Devon Pebblebed Heaths SAC/SPA⁴. POLICY HE02: Significant adverse effects on St. John in the Wilderness Grade II listed church and churchyard. Sustainability Concerns: The development does not minimize the need to travel, as it is located in an unsustainable area with the main access point over 4.2 miles from Exmouth town center.

Site Selection Methodology: The inclusion of Exmo_20a and Exmo_20b in the Reg 18 consultation is questionable, as these sites were not mentioned in any key evidence reports or discussed at relevant meetings¹.

Climate Change and Transport: The development does not align with goals to reduce reliance on car use, increase walking/cycling, and reduce congestion.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove Exmo_20 from the plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See attached PDF.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

The site Exmo_20 is upstream of Exmouth, with main rainwater catchment into Withycombe. As a resident on the land proposed for widescale development I am aware of the clay soil and risks to flooding, myself and my neighbours are unable to walk on our gardens in the winter months due to high water tables and flooding ground. This is in conflict of Policy AR01B.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Copilot The Exmo_20 development would have significant adverse effects on St. John in the Wilderness Grade II listed church and churchyard, drastically altering the peaceful setting for worship that currently exists for the congregation. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Habitats Regulations Assessment (dated 30/01/2025) confirms that there is "currently not enough sufficient certainty to rule out adverse effects on integrity in relation to air quality" for the East Devon Pebblebed Heath SAC/SPA1. This indicates that the Exmo_20 development conflicts with Policy OL09 and Policy PB0423.

Currently, without the increase of 700 - 1400 additional cars there is significant ques of traffic approaching and leaving the B3179, in particular through Woodbury. The addition of these additional vehicles will bring the risk of significant environmental damage.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development of Exmo_20 would fragment and isolate habitats, destroying wildlife corridors, which violates paragraph 13.23 of the local plan. It would also harm irreplaceable habitats, veteran trees, and species-rich hedgerows across the site, contrary to paragraph 13.9.

As a resident of the site proposed for development we frequently witness deer, foxes, adders, bats and many wild birds. Recently just a few hundred metres from the development there is significant evidence of Beaver inhabitation.

There are multiple tree preservation orders surrounding our property to protect.

Increased footfall and housing on the boundary of the Common is concerning.

I am worried that relevant stakeholders have not been engaged with thoroughly, a FOI with Natural England showed no consultation end of 2024. Similarly contact with Devon Wildlife Trust is suggestive of limited communication or engagement. The maps and outlines for the proposal, including access have changed which means that it's not clear if any discussion with stakeholders has been on accurate maps and proposals, and therefore allowed full consideration of the implications.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Exmo_20 development would cause significant and irreversible damage to tranquility, wildness, and dark skies, which is contrary to POLICY OL011. The Pebblebed Heaths, designated as a specialist conservation area, should be protected. However, this development would force wildlife into smaller, restricted areas, placing them at risk due to human encroachment on areas of outstanding natural beauty.

Transparent and detailed engagement with stakeholders such as the Devon Wildlife Trust and Natural England has been poor.

The access to the site is proposed right off the main B road. The increased volume of traffic through the immediate area as well as the additional footfall, dog fouling etc is a real risk to the environment.

There is confirmation of beavers at Bystock ponds along with other rare wildlife which will be grossly disturbed by the creation of this development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development of Exmo_20 will undoubtedly fragment and isolate habitats, destroying wildlife corridors. This contravenes paragraph 13.23 of the local plan. The impact would be devastating, causing irreparable harm to habitats and affecting vegan trees and species, which is against paragraph 13.9.

As a local resident, I have firsthand experience with the area's wildlife, including deer, birds, and dragonflies that frequent our garden. We are surrounded by tree preservation orders to mitigate damage and destruction. It is impossible to build such a large development, which has the potential for further expansion in the future, without harming the habitat and its resident wildlife. There has been poor engagement with organisations such as Natural England and Devon Wildlife Trust. Maps have been inaccurate, the perimeter of the site boundaries and main access changed. This has led to really unclear and poor communications which have been misleading both the general public and important stakeholders.

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 from the Plan based on the close proximity and devastating damage to the Bystock Ponds and Common.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development of Exmo_20 would with certainty fragment and isolate habitats and destroy wildlife corridors. This goes against paragraph 13.23 of the local plan. This would have devastating effects, detrimental to irreplaceable habitats and vegan trees and species. This is contrary to paragraph 13.9. As a resident of the local area I have first hand experience of the wildlife, with deer, birds and dragonfly frequenting our garden. We are surrounded by tree preservation orders to mitigate damage and destruction. There is no way to build such a huge development, which has been cited as having even further potential for scope of development in future years to come, in a way that protects and sustains the habitat and it's resident wildlife.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Exmo_20 development would destroy and cause immense terminal destruction to tranquility, wildness and dark skies”, this is contrary to POLICY OL01’.

The Pebblebed heaths should be protected as a specialist conservation area, yet this wildlife will be driven into smaller and restricted area, placed at risk by human development on areas of outstanding natural beauty.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed Exmo_20 site should not be allocated due to the immense risk of harm to the local environment and Pebblebed healths (SAC/SPA). This is in breach and contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. Protection legislation is there to ensure these areas of outstanding natural beauty and associated wildlife are kept safe. Sprawling and extensive developments such as this on the boundary of these areas will destroy and cause harm with pollution, light pollution, footfall, dog fouling. There have to be alternative sites in and around the local area which are better suited and will cause less irreparable environmental impact.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan and reallocate housing allocation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 or reduce to Exmo_20B.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

LACK OF CONSULTATION & ENGAGEMENT The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. Lack of transparency means that members of the public have not had opportunity to consider and feed into the plans.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: EDDC has mis-led the community, with poor and non-transparent communication. Exmo_20 as a site was discounted as a site and therefore marked red (non-allocated), similarly the site has been referred to in multiple allocations (Exmo_20, Exmo_20A, Exmo_20B, Exmo_46). This has meant that the opportunity for community engagement has not been possible and led many to believe that the "declined by planning inspectors" means that the development can no longer happen, which is incorrect. Similarly large stakeholders such as Natural England have not been consulted (FOI obtained November 2024) which is a significant concern in terms of informed process.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: EDDC has mis-led the community, with poor and non-transparent communication. Exmo_20 as a site was discounted as a site and therefore marked red (non-allocated), similarly the site has been referred to in multiple allocations (Exmo_20, Exmo_20A, Exmo_20B, Exmo_46). This has meant that the opportunity for community engagement has not been possible and led many to believe that the "declined by planning inspectors" means that the development can no longer happen, which is incorrect.

Similarly large stakeholders such as Natural England have not been consulted (FOI obtained November 2024) which is a significant concern in terms of informed process.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

INCREASED FLOOD RISK Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. (POLICY AR01(B) states that development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere). As a resident close to the proposed Exmo_20 site I am more than aware of the clay soil which waterloggs the gardens and spaces around my own property and neighbours. During the winter months we are unable to access our gardens due to excessive water collection and poor drainage, this will be exacerbated and place not only the properties onsite but also those downstream.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXTENDING THE SETTLEMENT BOUNDARY OF EXMOUTH Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths. The potential environmental harm from the development will likely be devastating for the wildlife of the Pebblebed heaths and local area. Moving the boundary of the town right to the top of the Pebblebed heaths will no doubt impact from a footfall, light pollution and vehicular pollution at the least. There are minimal/unsatisfactory facilities within the site which means that travel to Budleigh, Woodbury, Exmouth or Exeter is a requirement.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

COALESCENCE BETWEEN BUDLEIGH AND EXMOUTH Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. (POLICY OL05: This policy stated that development will not be permitted if it could lead to or encourage settlement coalescence). As a parent of a primary school age child resident in the area of the proposed Exmo_20 we attend Budleigh for school and nearly all facilities due to the proximity. This would no doubt be true if the development proceeds putting excessive pressure on the infrastructure and road networks.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce to Exmo_20B or reallocate housing allocation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

POLICY OL01 states that development will only be permitted where it would not harm the aesthetic and perceptual factors such as “tranquillity, wildness and dark skies”. HERITAGE / ST JOHN IN THE WILDERNESS CHURCH. ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. (POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings). Similarly the devastating impact on environmental tranquility in view of an enormous development with main access straight onto the B379 and onto the Common.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. (PARAGRAPH 13.9 aims to protect irreplaceable habitats and important features such as ancient woodlands, veteran trees, and species rich hedgerows from destruction and degradation).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. (PARAGRAPH 13.23. The Local plan states that East Devon has diverse but fragmented habitats and aims to enhance biodiversity increasing habitat areas and connecting isolated habitats).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce in size to Exmo_20B or reallocate housing quota to more suitable location.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

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ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. (PARAGRAPH 13.23. The Local plan states that East Devon has diverse but fragmented habitats and aims to enhance biodiversity increasing habitat areas and connecting isolated habitats).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce in size to Exmo_20b or reallocate housing elsewhere in better suited areas.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI. (PARAGRAPH 2.10. Objective 8. This states the objective “To protect and enhance our outstanding natural environment and support an increase in biodiversity”).

There is extensive wildlife inhabiting the Pebblebed Heaths and bystock ponds, ranging from ground nesting birds, owls, beavers, cuckoo, woodpeckers, deer, dragonflies and a multitude of other species. The introduction of a large development so close to the protected sites will adversely effect the wildlife and cause destruction of the local habitats due to light pollution, vehicle emissions, increased footfall, dog fouling etc. The inclusion of "nature spaces" proposed within the plan following the disruption and development of 700+ houses will not be enough to mitigate the huge negative impact.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce to Exmo_20B or reallocate to another site.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).” (POLICYPB04 states that proposed plans must not affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017 (including SAC/SPA)). The increase in vehicles accessing the site will undoubtedly impact the air quality and have adverse effects on the local environment. As a local resident who drives the road for a school run the road is already treacherous with the volume of traffic currently, blind spots and challenging junctions.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath. (Policy OL09 states that “permission will not be granted for development which would result in pollution that cannot be adequately mitigated”). The initial proposal is for 700 houses. Council have already indicated that there is opportunity for a much larger number within the plot. The location of the plot and steep topography mean that the site will predominantly be accessed by road, the average household own 2 vehicles which means in excess of 1400 additional vehicles travelling on an already busy and at times fast and dangerous road with multiple junctions and poor signage. This site borders the Pebblebed Heaths. The significant emissions have potential to cause serious and irreparable harm.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA). (Policy PB01 states that development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless they cannot be located on alternative sites that would cause less or no harm). The allocation of this plot will no doubt cause immense harm to the local wildlife by a combination of but not limited to : damage/impact of light pollution, emissions pollution, dog fouling, increased footfall and human impact. There are ground nesting birds, rare species and of late significant evidence of beavers in recent months, all of which will be compromised by this development so close to the site. Even with a 400m buffer there is no certainty that this buffer cannot be utilised for commercial or communal areas, all of which will have significant detrimental impact. In addition there are no pavements or safe pedestrian crossing areas.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce the size of Exmo_20 to the proposed 20B or reallocate. Remove the main access from the B379.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon. (PARAGRAPH 2.6 states that "Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development). NATURAL ENVIRONMENT

Allocation of Exmo_20 is in conflict with policies PB01, PB04, OL09, OL01 and paragraphs 2.10, 13.23 and 13.9 of the Local Plan.

The building of 700+ houses and commercial buildings on the edge of an area of outstanding natural beauty which is inhabited by extensive wildlife will degrade and destroy the charm and character. It is enormously concerning that decisions have been made to allocate this site against planning inspectorate advice and in the absence of formal consultation with important advising and regulating bodies due to misleading communications ie. Map outlined site Exmo_20 as rejected. This would lead stakeholder and members of the public to assume that the site was non-viable and therefore not progressing which is incorrect (FOI confirmed that Natural England had not as of December 2024 been consulted - I have this in correspondence dated 17th December). "In response to your request Natural England can confirm that we have not been consulted by or hold any correspondence with EDDC over this proposed development.

The screenshot included in your email corresponds to the Exmo_20 site. The initial Draft Local Plan consultation (November 2022) showed Exmo_20 to have been rejected

as a housing allocation site. The further consultation in May 2024 with additional sites did not include Exmo_20."

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce in size to Exmo_20B or reallocate.

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)

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(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.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard. (POLICY TR03 states that where development is likely to generate significant amounts of vehicle movements planning permission will not be granted unless they can identify measures to secure new sustainable travel arrangements, taking into account (amongst other things) the scale of development and the availability of public transport, and walking and cycling opportunities). As an individual who frequently commutes to work the challenges of driving through Woodbury or returning up onto the Common which often at this time can result in significant travel delay and queuing vehicles backed right down onto the Woodbury road. The addition of the volume of cars associated with the 700 proposed houses will exacerbate exponentially. There are multiple entrances onto the B3179

which at this time can be treacherous to navigate. There is not the infrastructure to safely support this development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce the size of the allocation to 20B only or reallocate housing elsewhere.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. (Paragraph 11.2 promotes focussing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion). As an individual who is required to travel frequently to work the road infrastructure of the B3179 is often even without the additional housing congested, accidents and with multiple unsafe junctions opening onto the road. The cross roads at Bystock are a dangerous crossing point for walkers, cyclists and horse riders. Additional vehicular pressure on this already challenging road adds enormous risk and is dangerous. The additional traffic and associated environmental damage that this will cause poses great risk to the local wildlife and habitat.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20,

reduce size of site or reallocate housing elsewhere in Exmouth. Do not access the site via the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. (Paragraph 11.2 promotes focussing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of exmo_20, considerable reduction in size (revert to Exmo 23)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: For transparency.

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion. (POLICY TR01 proposes that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development). As a resident local to this area I am aware of the impracticality of proposed transport methods. There are no public transport links and the added pressure on the B3179 is an immense concern - specifically on the already congested road networks of Woodbury and at the crossing points to the Common frequented by dog walkers.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure a thorough hearing and consideration of all points raised/concerned.

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6.

It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements. As a resident within this proposed catchment area I am very aware of the requirements to drive to access services such as basic local shops, GP, dentist and primary school. There are no significant infrastructure plans to mitigate this requirement. Additional travel impacts significantly and in a harmful way on the environment, it is particularly concerning so close to the Pebblebed heaths. The B3179 in it's current state is a fast road with no calming, which poses significant risk with the introduction of large volumes of additional traffic. (PARAGRAPH 11.6 proposes that it is feasible for larger developments to be within 800m of key services and facilities. (Studies cited in the Local Plan show that people prefer to walk if their journey is not further than 800m/10 minutes walking each way)). Such properties will encourage road use and be unsustainable for those residents who do not have this mode of travel to access basic facilities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan, reduce to previous proposal of Exmo_20B or reallocate elsewhere in area.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To have the opportunity to share in full concerns and ensure appropriate action/mitigation.

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location. (POLICY SP01 proposes to promote the most significant levels of development at the principal centre of Exmouth).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan, reduce in size to previous Exmo_20B and allocate elsewhere.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I wish to be present to ensure that all complaints and concerns raised are considered, addressed and clear outcomes.

Full name: Ruth Cheesman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO_20 access point is close to the town of Budleigh Salterton. This would mean that residents would most likely use the facilities in Budleigh rather than Exmouth. Budleigh Salterton has one high street, one primary school, one doctors and limited parking. This would undermine the settlement hierarchy and the Local Plan. It would go against the Strategic Nature Area 368 dividing a natural area. Policy OL01 - goes against this as it will damage the countryside.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ian Christie

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I do not believe that the development at Exmo_20 and Exmo_17 is sound, for the reasons below.

Exmo_20 is adjacent to East Devon National Landscape. Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty) includes the following: "Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant)". The site is adjacent to an NL. Due to the site's very elevated and sloping position, the site will be highly visible from a wide area including parts of Exmouth, the Exe estuary, and the other side of the Exe estuary. What at present is a charming rural view from these areas, topped by the Pebbledbed heaths, will become a very large housing development. This will negatively impact a very wide area from which this development will be visible. I believe therefore that it fails Strategic Policy OL02.

Exmo_20 will also negatively impact on traffic congestion, contrary to transport policy TR01. It is not a suitable location for anything other than car transport. It is too steep and too far from key services and facilities for cycling or walking, there is no nearby train station and bus routes are limited. Already the congestion into Exeter in the mornings is bad, with considerable queues at the junction of the B3179 and the A376 (as well as beyond there to the M5 motorway roundabout), and this will add to that congestion.

Exmo_17 is within a National Landscape ("NL"). Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty) includes "Development in a NL...will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant)... Major development in a NL will only be permitted in exceptional circumstances". I believe that a housing development of this scale is a major development and I don't think its development is exceptional circumstances. Furthermore, I don't think it will contribute to the natural beauty of the NL. For example, the very popular cycle/walking path between Exmouth and Budleigh Salterton along the old railway line provides pleasant rural scenery and passes through the middle of this development so will be spoiled by this development - or will force people in Exmouth to have to walk further to get to a rural setting. It therefore fails the NL policy requirement on two counts. It also sets a dangerous precedent, expanding Exmouth eastwards into the NL. Where will such expansion stop? Having expanded once eastwards, what will stop Exmouth expanding further eastwards into the NL? Really this area should be a green wedge, but this should be unnecessary given the NL.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan or limit it to a much smaller scale development adjacent to the existing development in the Meadowhall Road / Woodfield Close area. This will (i) ensure that it doesn't impair the view of the NL from a wide area, (ii) reduce the distance needed to be travelled to access services and facilities making it feasible to walk or cycle, and (iii) avoid excessive congestion on the B3179.

Remove Exmo_17 from the local plan. This will avoid unacceptable encroachment into the East Devon National Landscape and retain access to green spaces from the east side of Exmouth - eg along the shared walking/cycle path.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Eleanor Clarke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: JULIET CLARKE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo 20 would increase the necessity for car journeys and thus increase traffic congestion, in conflict with PARAGRAPH 11.2. It is an unsustainable development in terms of existing key facilities available in the area, particularly Exmouth. It is a very isolated site and would require people to travel far further than 800metres to the above existing facilities contrary to PARAGRAPH 11.6. As for suggesting inhabitants might walk or cycle to either town centre is laughable as it is too far and not an easy walk contrary to POLICY TR01. The access to Exmo 20 is significantly closer to Budleigh (which has even fewer facilities than Exmouth) thus practically merging the two towns of Exmouth and Budleigh contrary to POLICY OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo 20 Do not access the site via the B3179 - too dangerous

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Paul CLARKE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo 20 should not be positioned near to Pebblebed Heaths (SAC/SPA). Developing Exmo 20 is contrary to policy PB01. Exmo 20 is above the main rainwater catchment area for Withycombe Brook and would exacerbate the flood risk. This is in conflict with POLICY AR01B.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce size of Exmo 20 Do not have access via Southern Wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: CLAIRE CLEVELY

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO-20 development would be in conflict with the strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the local plan. It would cause harm to irreplaceable habitats ,veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via the B3179

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jeanette and Paul Coate

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

We believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: JP Coetzee

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The fields above St John In The Wilderness supports a unique habitat including rare orchids. This development will reduce local biodiversity.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20 should be removed from the plan, or at least significantly reduced.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Steven R. Cole

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Please refer to the attached PDF file 'Representations to East Devon Local Plan Consultation (SRCole EX84EY)'

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached PDF file 'Representations to East Devon Local Plan Consultation (SRCole EX84EY)'

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Gary Coles

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Gary Coles

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Gary Coles

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: simon collas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Do not access the site via Southern Wood,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Alison Colledge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing EXmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

Developing EXmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

The main access point of EXmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of EXmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXmo_20 from Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Patrick Colledge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Richard Collins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo 20 is much closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of the town would therefore be the preferred choice of the residents of Exmo 20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo 20 for housing allocation should be selected, one which would be deemed available, achievable and suitable in the Housing and economic land availability assessment. Exmo 20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo 20 being a supporting foraging habitat. Allocating Exmo 20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the Local Plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo 20 would harm to the heritage assets at the Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting that currently exists, contrary to POLICY HE02.

Exmo 20 would have a detrimental effect on this open countryside site and adjacent internationally designated wildlife sites, eliminating "tranquility, wildness and dark skies", contrary to POLICY OL01.

Exmo 20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo 20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulation Assessment of 30/01/25 states that there is "currently not sufficient certainty to rule out adverse effects in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test.

Development of Exmo 20 on heavy clay subsoil with ineffective soakaways would worsen the already identified flood risk along Withycombe Brook through Exmouth. This conflicts with POLICY AR01B.

Exmo 20 would increase car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. the isolated location provides unsustainable development as residents would need to travel much more than 800m to access key services and facilities, contrary to PARAGRAPH 11.6.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Juniper Connal

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

The main access point of Exmo_20 is significantly closer to BudleighSalterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in

conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I do not believe the local population is genuinely being listened to and the people making the decisions have no understanding of the negative impact of the proposed plan

Full name: Sophie Cook

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 23 and Policy OL09

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SD01 dev within Exmouth Maer lane STW catchment from the local plan. Even if it is addressed by SWW OFWAT processes meant that such improvements cannot be completed in the next 8 yrs To allow development of these locations prior to infrastructure expansion is to knowingly enable create and add to the sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed allocation in Exmouth are within a town that is already unable to cope with the amount of sewage in its out dated and broken sewage treatment network. Which means you will be contravention of Policy SP07 & SP08 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmouth 20 from the local plan. The policy doesn't take into account the already

acknowledged failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. EDDC have issued notice of a civil emergency and a vote of no confidence in SWW because of the well publicised sewage infrastructure failures across Exmouth 2019 to 2025 To not acknowledge this issue despite EDDCs clear knowledge of these problems is highly irresponsible.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: emma cooling

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I believe the development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Heidi cooper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the 'tranquility, wildness and dark skies' which is contrary to POLICY OL01. Exmo_20 would cause harm to the heritage assets most notably St John in the Wilderness Grade 2 listed church, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02. Development of Exmo_20 on heavy clay subsoil would exacerbate the already identified downstream risk along Withycombe Brook, which is already under additional pressure from climate change and development. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated position provides unsustainable development as residents would need to travel further than 800m to existing services, contrary to PARAGRAPH 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. An alternative site to Exmo_20 for housing allocation should be selected which is closer to the existing cycle path and existing shops and further away from the Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Full name: Paul R Corder

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. * This area, which is largely undeveloped does not have any of the required infrastructure for housing (water, sewers, power etc etc) nor does it have good transport links. Roads in the area are overloaded and not only a poor state of repair but insufficient to cope with the additional commuter traffic (presumably to Exeter & beyond). * Reduce the size of Exmo_20 * Do not access the site via the B3179

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: * Reduce the size of Exmo_20 * Do not access the site via the B3179 * Do not access the site via Southern Wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Marie Cowdrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building - National Heritage and Coastal Preservation area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area (tourism that the town depends on), along with causing devastation to the local wildlife living there. It would also create a precedent that could destroy further areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be within the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. There is also The ongoing sewage issue and general lack of infrastructure required to expand The town. The proposal to build industrial units next to the main road, the entrance way into the town from the East, is incogruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road only had one exit (into the main road) and would go straight across the the old railway line which is a popular and well used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of wellbeing and enjoyment. It would not be in the best interest of Exmouth to allow building on Exmo_17.

Full name: Mrs Natasha Cox

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Jackie Cox

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths. If positioned on this site it would destroy the “tranquillity, wildness and dark skies” of the countryside. Given the location it would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor’s, school, etc) would be the obvious choice for residents of Exmo_20. This would be detrimental to the community of Budleigh Salterton and would need to be considered in conjunction with the development of Budleigh Salterton. I consider that it is essential to assess the site with consideration given to the infrastructure of Budleigh Salterton and the effects this development would have on Budleigh Salterton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As it affects the Settlement of Budleigh Salterton due to its proximity to the services and the town, being closer to Budleigh Salterton than Exmouth, it needs to be modified to include how the development affects Budleigh Salterton and include how these effects will be mitigated.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Karen Crawford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The consultation may not be based on sound evidence in relation to the waste water infrastructure in the area. A previous Water Cycle Study (circa 2010) commissioned by East Devon District Council (EDDC) was predicated on the building of a new waste water treatment works (WWTW) to serve the new Cranbrook community. This plan was subsequently dropped by South West Water and the sewage diverted to Countess Wear. This study specifically assessed the projected capacity for waste water treatment over the coming years and (with the inclusion of the new works) concluded that several locations would be over capacity by 2025 including Maer Lane STW. Since the time of the study the new WWTW was not built, the population in East Devon has increased by more than twice the national average (Census data 2011 -21) and the published performance data in Exmouth shows a large increase in the use of storm overflows discharging untreated sewage into the sensitive estuary and designated bathing waters. This clear evidence, of an already inadequate sewerage infrastructure, is entirely missing from the draft Local Plan. The council wrote to Government last year citing the situation as an 'civil emergency' yet this is not reflected in the Local Plan. It would also appear that EEDC has failed to comply with section 33A of the PCPA which requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. We know that a follow up Water Cycle Report has been Commissioned by EDDC and was due to be completed last year but this does not appear in the draft Plan and has not been shared with the community. This new Water Cycle Study is a key part of the evidence required for the Local Plan going forward to reflect how this will ensure adequate capacity for waste water treatment in East Devon. We urge the Planning Inspector to consider these omissions and request urgent action by EDDC in conjunction with South West Water to address and assess sewage infrastructure future capacity. We can submit further evidence to support this if required.

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.: EDDC have to acknowledge that the sewage infrastructure is already beyond capacity and therefore cannot support the proposed housing development. EDDC need to demonstrate the necessary infrastructure is in place to cope and provide the relevant reports and evidence of this.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As above. Inadequate sewage infrastructure exists.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As above. Provide evidence that sewage infrastructure can cope before more development takes place.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As above, A full review of the sewage infrastructure capacity has to take place. EDDC cannot rely on future promises of South West Water.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Teresa Creton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The access point on to the B3179 would be exceedingly dangerous. It is a very busy, fast road There will be no infrastructure to support people who would need to travel into Budleigh. The school, doctor's surgery and shops are already oversubscribed. Limited shops. Extra traffic not suitable for the one road in and out of Budleigh. People would be reliant on cars as public transport insufficient. Too steep and dangerous road for cycling. Too far to walk. There would be a severe negative effect on Pebblebed Heath Nature Reserve at Withycombe Raleigh Common.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan. Do not access the site via the B3179. Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

"vehicular access, to accomodate modest levels of development, will be allowed for southern site parts from the road 'southern Wood' ...primary vehicle access to the site, serving the large majority /large bulk of development will be from the B3179 to the north. This directly contradicts the National planning policy framework page 33. point 115b "safe and suitable access to the site can be achieved for all users"

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: reduce the size of the development to the original exmo-20b lower site

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot

simply be mitigated by planting new trees. Exmo_20 also contains many long-established hedgerows across the site, the lengths of which are considerable.

The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network,

part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. We have documentation of badgers, foxes, Otters, dormice, tawny owls, brown long eared bats, pipistrelles and more all using this area from Southern Wood upward toward the heath for foraging and predating. early purple orchids are also present in the fields.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath. If the new development goes ahead and inevitably links the site from Southern Wood to the B3179, the quickest route to Exeter will be through there from many areas of Exmouth which will increase traffic at an earlier point along the B3179, currently most traffic travels up higher marley road or past Kings garden centre.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative sites which would cause less or no harm to the Pebblebed Heaths. Of all the sites put forward this site will cause the most harm to the prbblebed heath with its close proximity to the protected site, dog walkers regularly leave dog faeces on the common which over nutrifies the soil which is harmful to the flora and fauna which needs a nutrient deficient environment, increased dog walking is inevitable if you develop across the road from the protected site. (SAC/SPA).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: revert to exmo20-b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 3.34. Although Exmouth is classified as a Tier 1 settlement, it lacks the necessary infrastructure and services to support its current population. While the proposed development may contribute financially towards infrastructure, it will not provide an additional doctor's surgery or dental practice—both of which are already insufficient for Exmouth's residents. Furthermore, no new secondary school will be established; in recent years, many children have been forced to travel to Cranbrook due to the lack of capacity at Exmouth Community College.

Additionally, Exmouth's sewerage system is severely inadequate, leading to frequent discharges into the sea, resulting in regular beach closures. This issue has been highlighted in national news multiple times, underscoring the severity of the problem and we are taking legal action against SWW. Paragraph 3.34 states that directing growth to Tier 1-4 settlements ensures development occurs in areas with existing infrastructure and services. However, Exmouth's current deficiencies contradict this principle.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 11.6, as it qualifies as a "larger" development. The majority of the site is situated beyond 800 meters (approximately a 10-minute walk) from any existing key services and facilities. Additionally, there are no proposed plans to introduce significant key services within the site, meaning residents will likely need to drive over two miles via the B3179 to access essential amenities in Exmouth or nearby settlements.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy SP01. Although Exmouth is classified as a Tier 1 town, Exmo_20 is located four miles by car from Exmouth town centre, from where I live in Southern Wood it is quicker for me to drive to Budleigh to the shops than to Exmouth Town centre.

Exmouth is unsuitable for further significant growth due to its geographical constraints. Positioned on a peninsula between the River Exe and the coast, the town centre lies at the southern end, preventing 360-degree expansion. Existing development has already spread a considerable distance from the town centre, making any new development closer to neighboring towns and villages rather than reinforcing Exmouth as the principal centre. Consequently, development at Exmo_20 would be too far removed from the town to be sustainable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove EXMO-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: On page 78 of the draft local plan, the paragraph states "Vehicular access, to accommodate modest levels of development, will be allowed for southern site parts from the road 'Southern Wood', subject to detailed assessment of highway access acceptability and objective review of local road and junction capacity and with mitigation provided to address unacceptable adverse impacts. Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the north. High quality, safe and attractive to use pedestrian, cycle and public transport access, particularly providing southerly site links into Exmouth and to nearby services, facilities and job opportunities, will need to be an essential part of the overall development scheme". I have concerns about what mechanisms will be put in place to prevent private cars from the upper site accessing roads where public transport buses will use to travel through southern wood and into meadow view road, therefore the whole site will be accessible by car through these two already congested roads, the on street parking in these roads with private vehicles is heavy, with cars parked on pavements through many areas, pedestrian access with prams and mobility scooters are forced into the road to pass. Buses through meadow view and southern wood will be difficult to progress with cars parked on both sides making it very narrow.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Access through Southern Wood will have a cumulative impact on other developments in the area; and proximity to the SSSI environmental designation on the B3179 side of the site is within 400m of the protected site.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. As a resident of Southern Wood, I find it quicker to drive to Budleigh for the beach and facilities than to drive to Exmouth beach.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. It contradicts the report commissioned in 2016 which indicates 91% of visitors came to the common by car, this development will place humans within a 10 minute walk and threaten the ecosystem with over visitation and dog foul being left to over

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should be located on an alternative site where it would cause no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo 20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: A Crowhurst

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development at Exmo_20 is fundamentally flawed and poses a significant threat to the local environment, community, and infrastructure. It stands in direct conflict with multiple policies in the Local Plan and would cause irreversible harm. Here's why Exmo_20 must be rejected:

Destructive to Protected Habitats The development could and should be relocated to an alternative site where it would cause minimal or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 directly contradicts POLICY PB01 of the Local Plan and fails to align with the agreed mitigation strategy. Protecting these sensitive and legally protected habitats is not optional—it is essential.

Loss of Tranquillity, Wildness, and Dark Skies Exmo_20 would permanently destroy the peaceful, unspoiled character of the countryside, undermining the “tranquillity, wildness and dark skies” that define this rural landscape. This is a direct violation of POLICY OL01.

Destruction of Biodiversity and Wildlife Corridors The development would fragment and isolate crucial wildlife corridors, endangering irreplaceable habitats, veteran trees, and species-rich hedgerows across the site. This is in direct conflict with PARAGRAPH 13.23 and PARAGRAPH 13.9 of the Local Plan, which mandate the protection of these vital ecological features.

Failure to Meet Habitat Protection Requirements The Habitats Regulations Assessment (dated 30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects on integrity” in relation to air quality within the East Devon Pebblebed Heaths SAC/SPA. Proceeding with the development would violate POLICY OL09 and POLICY PB04.

Harm to a Historic Church and Its Setting Exmo_20 would severely damage the historic setting of St John in the Wilderness, a Grade II* listed church. The proposed development would irreversibly alter the peaceful atmosphere of this sacred site, undermining the congregation’s ability to worship in tranquillity. This is contrary to POLICY HE02.

Increased Flood Risk Situated upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, Exmo_20’s subsoil of heavy clay would render soakaways ineffective, exacerbating flood risks downstream in Withycombe. This directly contradicts POLICY AR01B and exposes the community to increased flooding hazards.

Unsustainable and Isolated Development Exmo_20 would significantly increase car dependency and traffic congestion. It is too far (and too steep) from the nearest town centre for walking or cycling to be a viable option, forcing reliance on cars. This directly violates PARAGRAPH 11.2 and PARAGRAPH 11.6 of the Local Plan and conflicts with the goals of sustainable development outlined in POLICY TR01.

Encourages Unwanted Coalescence Between Budleigh and Exmouth The primary access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh’s infrastructure and services (including schools, doctors, and shops) the obvious choice for residents. This would create unwanted urban sprawl and the gradual merging of Budleigh and Exmouth, which is in clear violation of POLICY OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan, Revert to Exmo _20b as previously proposed.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Local resident of both Budleigh (in the past) and now Exmouth.

Full name: Lisa Curtis

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. ANOTHER FACTOR TO CONSIDER IS THAT THERE IS ONLY ONE MAIN ROUTE INTO THE TOWN VIA THE A376 WHICH FREQUENTLY SUFFERS LONG TAILBACKS NOW WITHOUT THOUSANDS MORE CARS BEING ADDED TO THE TOWN.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Claire Darby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

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.: Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: William Davey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access of Exmo- 20 is a lot closer to Budleigh Salterton than Exmouth. The services of Budleigh, Doctors etc. could not cope. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Alan Charles Davie

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St. John In the Wilderness Grade II” listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Simon Davies

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Expo_20 is significantly closer to BUDLEIGH SALTERTON than EXMOUTH, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High St, Pharmacy, Doctors, School, Beach etc) would be the preferred choice for residents of Expo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy and increase traffic congestion, in conflict with PARA 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARA 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. this is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Julie Davis

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Jenifer Davis

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am objecting to developers Eagle Investments (as proposed on the Site Selection Report, Site reference 20b, at the Strategic Planning Meeting on the 3rd September last) planning to build a bridge and road across a very wide section of Withycombe Brook which runs along the bottom of Southern Wood, Exmouth, in order to gain access to their proposed new site of 700 or maybe more new houses. Planning Officers need to come and to look at the width of Withycombe Brook at the bottom of Southern Wood to realise what a substantial structure would need to be erected to support a bridge for any traffic. This is unnecessary as there is already a road to the proposed site accessed from the B3178 (Budleigh Salterton road). The road running through Liverton Business Park presently ends in a roundabout, there is also a footpath offering a short walk past a children's play area to Dinan Way where there are bus stops to Exmouth town centre. I can see no advantage in causing chaos and structural upheaval to Southern Wood and continued destruction of established woodland with homes for wildlife, when it is totally unnecessary. If homeowners on the new development had access through Southern Wood, they would be no nearer present schools, shops or any infrastructure because of the disadvantage of having to navigate these minor roads with parked vehicles when easier access is already available. The established road accessed from B3178 the gives: LESS COMPLICATED ACCESS TO THE NEW SITE THROUGH THE LIVERTON BUSINESS PARK from the the Salterton Road, the B3178. This route would give potential new homeowners far easier and more direct access to Budleigh Salterton and beyond or to Exmouth town centre and sea front, rather than having to navigate through Southern Wood, then Meadow View Road, then Dinan Way to reach the Salterton Road (B3178). There are many parked cars in the vicinity of Meadow View Road, making this an unsuitable through road for any heavy traffic. The parking issues have arisen because

some landlords, who own properties in the close proximity, have let their garages out separately, leaving tenants with no off road parking. An unresolvable problem. If I were to live on the new proposed development, I would choose to use the road through Liverton Business Park, not only to have the advantage of all the commercial and retail units on my doorstep, but also because it is the most straight forward and less complicated route for Budleigh Salterton or Exmouth town centre and seafront. There would be no parked cars to have to navigate around or to block this road as all the commercial and retail units have their own free parking areas. In the 1980's, 'stop on demand buses' were tried along Meadow View Road, (I used to catch them) but this was abandoned. There is a lot more parking now than there was back then. It is so important for Planning officers to visit the area and see for themselves, not to rely on photographs as the Google photograph of Southern Wood used at the Strategic Planning Meeting on the 3rd September last by Eagle Investments. They need to see for themselves the width of Withycombe Brook at the bottom of Southern Wood and realise what a huge structure would need to be erected to span the brook and support a bridge for any traffic flow, also to look at the parking issues in Meadow View Road and see how access will be frustrating if more traffic goes back and forth from the proposed new estate through Southern Wood. TRAFFIC LIGHTS TO EXIT OR ENTER LIVERTON BUSINESS PARK are much needed now. It is presently a dangerous junction without traffic lights as some drivers take chances when trying to exit the park. Traffic lights would enable the emergency services at Liverton to act more swiftly and safely to reach any accidents or any major disasters faster, by giving them control of the traffic lights creating what I believe is called a red zone area, making us all safer. I understand this was requested at an earlier stage but has been held back. Clinton Devon Estates who own the land and rent out the units, also being one of the developers for the proposed sites, could help achieve this. I did email Clinton Devon Estates 1st July last year (2024) about the problem of queuing to leave Liverton Business Park, and the likelihood of traffic lights, before I knew of any intentions of a road being created through Southern Wood, but they did not reply. Traffic lights were eventually placed at the top of Dinan Way and at Tesco Stores on the Salterton Road to alleviate traffic problems, making the junctions safer for us all. It is inevitable that traffic lights will be necessary at some time at the junction leading in and out of Liverton Business Park. Homeowners on the new development will use this established road leading onto the B3178, rather than using minor roads like Southern Wood. The developers should provide traffic lights as part of their planning applications.

EAGLE INVESTMENTS. New housing is needed, especially social housing, and I understand the pressure councils are under to supply more housing. But the building of new homes should not be to the detriment of existing homes and families in Southern Wood, Meadow View Road and St Johns Road, who will all suffer from noise, pollution

and disruption if a road comes through Southern Wood. We are part of Exmouth too and I worry that my concerns, and those of others in this area, will not be considered as it appears Eagle Investments are so confident of their access through Southern Wood being agreed, they have already felled many trees in the woods across from Withycombe Brook at the bottom of Southern Wood. You can now see through the woods; the denseness has been depleted. Trees are important, not only in helping flood management. Eagle Investments started felling trees at the bottom of Southern Wood in 2023 and when asked by neighbours the reason, they were told it was due to Ash dieback. I understand Eagle Investments obtained a licence from the Forestry Commission, application Ref: 018/2753/2022, a licence with permission "to fell trees for silvicultural thinning to improve the quality and vigour of the remaining trees and that any planning permission sought after would not override any conditions of the licence". Eagle Investments workers have felled many trees conveniently located in the path of their new proposed road at the bottom of Southern Wood, this was before any planning permission had been sought or granted. If they are given permission for road access through Southern Wood, they will have to remove any remaining trees to enable the erection a very substantial structure to support a bridge and road over Withycombe Brook, therefore disregarding any conditions of their licence from the Forestry Commission "to fell trees for silvicultural thinning to improve the quality and vigour of the remaining trees and that any planning permission sought after would not override any conditions of the licence". SOUTHERN WOOD is presently a quiet cul de sac with 12 houses, all situated close to the road so a higher flow of traffic will cause air pollution issues. The road is approximately 6.2 m at its widest point, with raised curbs and paths both sides. The road slopes downwards towards the woodland and Withycombe Brook so is on a hill. Every house from the top of Southern Wood falls lower than its neighbour. As an example, our house, 8 Southern Wood (second from the bottom) is approximately 1 metre lower than our neighbour, 7 Southern Wood. The houses at the bottom of Southern Wood, 5 and 6, both nearest Withycombe Brook, I understand are level 3 flood zone. The brook does gush after heavy rainfall and can be heard. I now have slight flooding down the side of my house and puddling in my garden after heavy rainfall which is a new occurrence and will be made worse with 700 or more new houses set higher than Southern Wood causing a risk of flooding. At present in Southern Wood, we enjoy a wide variety of birds, such as cuckoos, magpies, black birds, robins, sparrows, sparrow hawks, pigeons, buzzards, crows, red wings, long tailed tits, the list goes on. I have seen badgers and foxes in my garden. There are wildflowers in the woods in spring including bluebells and primroses which also appear in my garden. I have the last remaining field hedge at the bottom of my garden from when it was Veiges Farm. Crows used to nest in the trees at the bottom of Southern Wood and fly around in circles above before roosting, but they have mysteriously moved on. Some crows still visit the road but no longer roost there. It will be a shame if an unnecessary road will change the environment we presently enjoy. I would refer to the red line drawn on Exmouth 20b,

where Eagle Investments have shown access not from Southern Wood, but from behind Southern Wood, from Woodfield Close, an area with garages and parking for the residents there. This is confusing and should be corrected.

Full name: Jonathan Dawson

Other party name (if relevant): Anne Dawson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would cause major detriment to heritage assets such as St John in the Wilderness church- contrary to policy HE02 It conflicts with the Strategic Nature Area 368, causing the loss of irreplaceable habitats, ancient hedgerows and trees (contrary to Local Plan para 13.9), and fragmenting habitats and eliminating wildlife corridors (contrary to para 13.23). It is also in conflict with Policy OL10 and Policy PB04. Extensive construction on this site with heavy clay soil and ineffective soakaways would exacerbate the flood risk of Withycombe Brook downstream through Exmouth which is exceeding its design capacity - in conflict with Policy AR01B The distance of this development from Exmouth makes Budleigh Salterton the nearest town with medical facilities, shops, and schools. This would undermine the settlement hierarchy and lead to the coalescence of Exmouth and Budleigh contrary to Policy OL05. Inevitably, with so many houses with limited (if any) public transport access, there would be a very substantial increase in private vehicles on the road towards Budleigh. The roads would be too steep and the distance too far from a town centre to use other forms of travel eg cycle or foot. This is contrary to policy TR01. Another site should be found for any additionally required houses, which was appropriate and available. Exmo 20 is contrary to policy PB01 and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul De'Athe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to EXMO_20 for housing allocation needs to be found (if any) and one which is agreed to be suitable, available and possible under the HELAA guidelines, Stage 1 of which requires the participation of local communities, amongst other groups. Any development such as EXMO_20 would be prejudicial to the local natural environment such as Bystock Pools and adjacent Pebblebed Heaths managed by the Pebblebed Heaths Conservation Trust (PHCT) supported by Clinton Devon Estates. These are recognised as Sites of Special Scientific Interest (SSSI). The National Nature Reserve (NNR) includes Bystock, Dalditch and East Budleigh. Special Areas of Conservation (SAC) set up prior to Brexit and still in force include Special Protection Areas (SPA) for rare or migratory locally birds such as Nightjars, Dartford Warblers, Curlews and Stonechats, all of whom are to be found on the heaths known locally generically as 'Woodbury Common'. Whilst no physical development can take place within 400 metres of the heaths, an adjacent local development of some 700 dwellings would give rise to a human population of potentially 1400+(?) people with accompanying dogs and cats posing a threat to the indigenous wildlife species on their doorstep. From April 1st-July 31st interference with nesting birds is prohibited, and ground nesting birds in particular are vulnerable to dogs of their leads on the heaths. The potential noise and pollution (av. 68gms per km of an average petrol/diesel vehicle) entering and exiting the projected estate onto the wholly unsuitable B3179 at all hours of the day would provide further intrusion into this vitally important area. Do we really need this in such a unique corner of not only East Devon but of the nation as a whole? We all have a duty to ensure the biodiversity and integrity of our unique local environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order that all points of view are equally represented in the interests of transparency in the planning process

Full name: Paul De'Athe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites defined as Sites of Special Scientific Interest (SSSI), a National Nature Reserve (NNR) incorporating national and internationally unique habitats such as the Pebblebed Heaths, as well as other physical heritage assets such as St John in the Wilderness church and churchyard a currently unique and attractive rural setting for worship and burials.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a local resident with an interest in the history, geography and ecology of this unique nationally important area

Full name: Paul De'Athe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

An alternative site to EXMO_20 for housing allocation needs to be found (if any) and one which is agreed to be suitable, available and possible under the HELAA guidelines, Stage 1 of which requires the participation of local communities, amongst other groups. Any development such as EXMO_20 would be prejudicial to the local natural environment such as Bystock Pools and adjacent Pebblebed Heaths managed by the Pebblebed Heaths Conservation Trust (PHCT) supported by Clinton Devon Estates. These are recognised as Sites of Special Scientific Interest (SSSI). The National Nature Reserve (NNR) includes Bystock, Dalditch and East Budleigh. Special Areas of Conservation (SAC) set up prior to Brexit and still in force include Special Protection Areas (SPA) for rare or migratory locally birds such as Nightjars, Dartford Warblers, Curlews and Stonechats, all of whom are to be found on the heaths known locally generically as 'Woodbury Common'. Whilst no physical development can take place within 400 metres of the heaths, an adjacent local development of some 700 dwellings would give rise to a human population of potentially 1400+(?) people with accompanying dogs and cats posing a threat to the indigenous wildlife species on their doorstep. From April 1st-July 31st interference with nesting birds is prohibited, and ground nesting birds in particular are vulnerable to dogs of their leads on the heaths. The potential noise and pollution (av. 68gms per km of an average petrol/diesel vehicle) entering and exiting the projected estate onto the wholly unsuitable B3179 at all hours of the day would provide further intrusion into this vitally important area. Do we really need this in such a unique corner of not only East Devon but of the nation as a whole? We all have a duty to ensure the biodiversity and integrity of our unique local environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order that all points of view are equally represented in the interests of transparency in the planning process

Full name: Paul De'Athe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The location of the access point of Exmo_20 is that that it will make the site significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) will most likely to be the preferred choice for residents of Exmo_20. This is conflict with the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

Full name: Avril Denton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Ian Deverell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Carolyn Deverell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Edna Devetta

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am objecting the Exmo_20 because of the lack of infrastructure and the impact it will have on the Local community, ie schools, doctor's surgurys (both of which are at capacity) and the sewage system which already cannot cope. This goes against POLICY OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Full name: Brian Devine

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Full name: Helen Dimond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Two on the allocation sites for Exmouth are in Lympstone Parish . While Lymp14 is an extension of the Goodmores Farm development and will look towards Exmouth , the other Lymp07 will clearly look towards Lympstone . Residents on both sides of Courtlands Lane identify with Lympstone not Exmouth. The former Courtlands House (which is in Exmouth Parish) chose to rename itself Lympstone Manor. Following a public inquiry a planning inspector concluded that this site was not a suitable one for housing . With the completion of the Dinan Way extension the development of this site seems inevitable but it should be recognised that it will add to the pressure on Lympstone . The site should therefore be included as an allocation for Lympstone as part of the 323 houses that are deemed to be necessary according to policy SD03

While a previous planning inspector following a public inquiry concluded that this site is .

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Transfer Site Lymp 07 to an allocation for Lympstone rather than Exmouth

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to make sure I have done all I can to ensure that Lympstone has an appropriate level of development

Full name: Rebecca Disbury

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development at Exmo20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo20 is contrary to policy Pb01 of the local plan and not in accordance with the mitigation strategy.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Tom Dixon

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. (POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings).

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are

separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. (POLICY OL05: This policy stated that development will not be permitted if it could lead to or encourage settlement coalescence).

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. (POLICY AR01(B) states that development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere).

The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Tom Dixon

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policies PB01, PB04, OL09, OL01 and paragraphs 2.10, 13.23 and 13.9 of the Local Plan. ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA). (Policy PB01 states that development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless they cannot be located on alternative sites that would cause less or no harm). ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath. (Policy OL09 states that “permission will not be granted for development which would result in pollution that cannot be adequately mitigated”). ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out advert effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).” (POLICYPB04 states that proposed plans must not affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017 (including SAC/SPA)). ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI. (PARAGRAPH 2.10. Objective 8. This states the objective “To protect and enhance our outstanding natural environment and support an increase in biodiversity”).

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. (PARAGRAPH 13.23. The Local plan states that East Devon has diverse but fragmented habitats and aims to enhance biodiversity increasing habitat areas and connecting isolated habitats). ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long-established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. (PARAGRAPH 13.9 aims to protect irreplaceable habitats and important features such as ancient woodlands, veteran trees, and species rich hedgerows from destruction and degradation).

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade

It* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left. (POLICY OL01 states that development will only be permitted where it would not harm the aesthetic and perceptual factors such as “tranquillity, wildness and dark skies”).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Tom Dixon

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location. (POLICY SP01 proposes to promote the most significant levels of development at the principal centre of Exmouth). ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements. (PARAGRAPH 11.6 proposes that it is feasible for larger developments to be within 800m of key services and facilities. (Studies cited in the Local Plan show that people prefer to walk if their journey is not further than 800m/10 minutes walking each way)). ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local

topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion. (POLICY TR01 proposes that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development).

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of

0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. (Paragraph 11.2 promotes focussing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion). ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has. (PARAGRAPH 3.34 states that by directing growth to the tier 1-4 settlements their approach ensures development is concentrated in areas with existing infrastructure and services). ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the

A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard. (POLICY TR03 states that where development is likely to generate significant amounts of vehicle movements planning permission will not be granted unless they can identify measures to secure new sustainable travel arrangements, taking into account (amongst other things) the scale of development and the availability of public transport, and walking and cycling opportunities).

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon. (PARAGRAPH 2.6 states that "Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mark Alexander Dodd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 should be located where it would not harm Pebblebed Heaths (SAC/SPA) It is contrary to POLICY PB01. Exmo_20 would destroy tranquillity wilderness and dark skies of the countryside contrary to POLICY 0L1 Exmo_20 would fragment and isolate local habitats and destroy wildlife corridors Contrary to PARAGRAPH 13.23. It would also be detrimental to irreplaceable habitats. veteran trees and species rich hedgerows contrary to PARAGRAPH 13.9 Evidence relating to air quality for contrary to EXMO_20 are absent. POLICY 0L09 & PB04 Due to soil type and position it will exacerbate flood risk and lead to more frequent sewerage discharges. Conflict with POLICY AR01B and others.

EXMO_20 will increase car travel in conflict with PARAGRAPH 11.2. It is siloed and people would need to travel much further than 800m to existing services contrary to PARAGRAPH 11.6. Too far and too steep for walking or Cycling to any town center. The main access is closer to Budleigh Salterton than Exmouth which will result in many people more using services and infrastructure of Budleigh High street, schools, doctors, beach. This would lead to the coalescence of Budleigh and Exmouth contrary to POLICY 0L05 of the local plan and be highly detrimental to the unique character of Budleigh Salterton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access

EXMO_20 from the B1379 and reduce the size significantly making it nearer to Exmouth with an area of wild water absorption for run-off.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Eileen Doherty

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am a resident in Exmouth. I strongly oppose this development, Exmo_17. This is a stunning piece of land which should be protected! I am a cyclist, and I would be very unhappy about the proposed access road, which would cut across the old railway line, a much used walking and cycling route.

Surely the land on the opposite side of the Salterton Road, near the existing business park, would be more suitable, being as we are all aware of the need for housing, especially affordable housing.

Full name: Elizabeth Mary Donnelly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/ SPA). Developing Exmo _20 is contrary to Policy PB01 of the local plan and not in accordance with with the mitigation strategy. The main access point of Exmo _20 is much closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (high Street, Medical Center, local school, beach etc) would be the obvious choice for residents of Exmo-20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY Ol05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan. Consider more appropriate development on brownfield sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Elizabeth Mary Donnelly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Elizabeth Doorbar

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access road into Exmo_20 is significantly closer to Budleigh Salterton than to Exmouth, which will put pressure on the infrastructure of Budleigh (the high street, doctors surgery, school etc0). This would lead to coalescence of Budleigh and Exmouth, which is contrary to POLICY OL05 of the Local Plan. An alternative site should be found, which will not cause damage to the National Landscape. The development would also exacerbate the risk of flooding along Withycombe Brook through Exmouth.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Kaymie Dowling

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor’s, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. lol

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Michael Downes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Anthea Downes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There is no way that the plan to join the land proposed to access the road opposite the Archery Club could cope with the significant amount of traffic which would be generated. The existing infrastructure already struggles with sewerage, water supply, flooding etc. The impact on Woodbury Common would be significant. The buyers of these houses would need transport and if each house has at least one car this is contrary to all environmental objectives. Remove Exmo_20 from Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Michael Downes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: *

The development proposed at Exmo_20 needs to be located on an alternative site where it would cause no harm to the Pebblebed Heaths(SAC/SPA). Exmo_20 is contrary to POLICY PB01 of the local plan and I do not believe it is in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. * The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would

be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lisa Drakelaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

...Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

...Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

...The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality(East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

...Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE 02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

...Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

...The main access point to Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. Red

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo 20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Karen Drodge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Michael Trevor Dunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the

Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment

area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from

any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor’s, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jill dupain

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

exmo_20 will destroy the wildness of the countryside and would be detrimental to the irreplaceable habitats

Full name: Brenda Duplock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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.: Wu

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.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

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.: Why is it so difficult to make objections to this plan?

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

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.: Why is it so difficult to make objections to this plan?

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

Full name: Pauline Dyer

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, therefore making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, School, beach etc;) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade 11* listed church and churchyard, and drastically altering the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality’ (East Devon Pebblebed Heaths SAC/SPA) such that the plan fails the integrity test.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk areas along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jeremy & Sarah Eaki

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. ? ?Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to

PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

?Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20B as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either 'preferred' or '2nd choice' therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been selected as either 'preferred' or '2nd choice' therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). POLICY AR01(B) states that 'development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere'. The site sits upstream of Exmouth, on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. PARAGRAPH 3.30 states that settlement boundaries define where development is acceptable. The settlement boundary of Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths. This then defines this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach, the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy OL05. POLICY OL05 states that development will not be permitted if it could lead to or encourage settlement coalescence. The main access point to Exmo_20 is 4 miles from the center of Exmouth and only 2.2 miles from the centre of Budleigh Salterton. This is likely to make Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02. POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings. A development the size of Exmo_20 and its proposed 700 houses, the size of a substantial village, surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. POLICY OL01 states that development will only be permitted where it would not harm the aesthetic and perceptual factors such as “tranquillity, wildness and dark skies” The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a ‘wilderness’ setting integral to the grade II* listed church which would be harmed by having a housing development encircling it. A buffer zone is unlikely to mitigate the reach of artificial light from a development this size.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. PARAGRAPH 13.9 states the objective is to protect irreplaceable habitats and important features such as ancient woodlands, veteran trees, and species rich hedgerows from destruction and degradation. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Development of Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. PARAGRAPH 13.23 of the Local plan states that East Devon has diverse but fragmented habitats and aims to enhance biodiversity increasing habitat areas and connecting isolated habitats. Exmo 20 lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network. This is part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. The land within Exmo20 provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond. All of which would be adversely impacted by the development at this particular site. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. PARAGRAPH 2.10, objective 8 states the objective “To protect and enhance our outstanding natural environment and support an increase in biodiversity” Development of Exmo 20 will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. POLICYPB04 states that proposed plans must not affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017 (including SAC/SPA) The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out advert effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. Policy OL09 states that “permission will not be granted for development which would result in pollution that cannot be adequately mitigated” The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send the significant increase in traffic along the boundary of the Pebblebed Heath.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01. Policy PB01 states that development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless they cannot be located on alternative sites that would cause less or no harm. It is not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA).

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6. PARAGRAPH 2.6 states that 'Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development' Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. TR03 states that where development is likely to generate significant amounts of vehicle movements, planning permission will not be granted unless they can identify measures to secure new sustainable travel arrangements, taking into account (amongst other things) the scale of development and the availability of public transport, and walking and cycling opportunities. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon. This site has no access to Dinan Way and the A376, therefore the significant amounts of vehicle movements from this site will be on to the rural B roads, locally notorious for being congested, substandard and not fit for such levels of heavy traffic.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or Dentist, both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school (a round trip of 22miiles) provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. (Paragraph 11.2 promotes focusing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion). Development at this site will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of

0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre, Making a round trip to the town center at least 8miles. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. POLICY TR01 proposes that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people will only choose to walk if their destination is within 0.5 miles and that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6 (within 800m of key services and facilities) It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. Studies cited in the Local Plan show that people will only choose to walk if their journey is not further than 800m/10 minutes walking each way. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location

Full name: Nadine Ebsworth

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Rebekah Eglinton-Stafford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

In addition I am extremely concerned at the ability of exmouth infrastructure to withstand all these expansions. Traffic is already bad enough. Where are the community spaces? The parks? What about water given SWwater current performance. Will we honestly fill every field with houses? It's so disappointing EDDC, we need you to fight to preserve our landscape.

Full name: Mrs Faith Elford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly nearer to Budleigh than Exmouth making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh would be the preferred choice for residents of the development. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Janice May Ellis

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Robert Elston

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Louis Eriksson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development at Exmo_19 will destroy a beloved local area of natural beauty and prevent it from being enjoyed by future generations. Furthermore, the planned area is too far from the local amenities and the existing transport infrastructure is insufficient to sustain such a large estate.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This area should be reconsidered, and protected from future developments.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Liz Evans

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

Furthermore, Exmo_20 would cause harm to the heritage assets at this Medieval settlement, most significantly St John in the Wilderness Grade II listed church, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

EXMO_20 would also have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the tranquillity, wildness and dark skies, which is contrary to POLICY OL01.

As well as all this, Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan. Do not access the site via the B3179. Do not access the site via Southern Wood.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Tom Evans

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at EXMO_20 could and should be located on an alternative site where it would cause less and or no harm to the pebble bed Heath (SAC/SPA) developing EXMO_20 is contrary to policy PB0 one of the local plan and not to in accordance with the mitigation strategy

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Howell Martyn Evans

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than it is to Exmouth, making Budleigh clearly its most convenient and accessible town. The services and infrastructure of Budleigh (viz., the High Street, Budleigh Medical Centre, schools, the branch Library, the beach and Otter Estuary etc.) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the local plan, and is not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Mediaeval settlement, most significantly the Grade II* listed church St John in the Wilderness, eroding the attractive rural setting of worship and burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally-designated wildlife sites, eliminating the ‘tranquility, wildness, and dark skies’ - contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species-rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04, since the Habitats Regulations Assessment (30-01-25) states that there is ‘currently not sufficient certainty to rule out adverse effects in integrity in relation to ... air quality (“East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already-identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 the energy hierarchy, and would increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development because residents would need to travel much further than 800 metres to reach existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as a preferred choice of transport. This is contrary to POLICY TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I wish to hear for myself the reasoning and arguments for and against the position that is adopted.

Full name: Dr Christopher Everall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: *

??The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Dr Christopher Overall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is not in a town and access is to a rural B road that does not lead to Exmouth. it would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. There are no cycle lanes or pavements into Budleigh Salterton so people will drive.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The vehicular access needs to lead into Exmouth to connect it to the town. not onto the B3179. PReferrably alternative sites should be developed within the bpundary of Budleigh or Exmouth with cycle lanes and walking routes that are useable.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Elizabeth Everett-Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo -20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo-20 is contrary to POLICY PB01 OF THE LOCAL PLAN AND NOT IN ACCORDANCE WITH THE MITIGATION STRATEGY. Exmo _20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800 metres to existing key services and facilities, contrary to PARAGRAPH 11.6 It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, School, beach, etc.) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

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 from plan or greatly reduce the size of Exmo_20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Leigh Extence

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

The main access point of Exmo_20 is significantly closer to BudleighSalterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in

conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jed Falby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is too big and will be too visible if built as currently planned on the high road B3179 (Ting Tong).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refuse, revise and improve a project that is far too imposing on our beautiful countryside.

Full name: Andrew Farley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. * The Habitats Regulations assessment (30.01.25) confirms that there is?"currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jennie Fawcett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, Schools, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The

isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to ...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. the main site access proposed is opposite the SAC/SPA.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan. Reduce the size of Exmo_20. Don not access the site via the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Darren Fellows

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Roger Fetherston

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than it is to Exmouth by a considerable distance. This fact alone makes Budleigh the obvious and most convenient local town. The services and infrastructure of Budleigh would logically be the preferred choice for residents of Exmo_20. In effect Exmouth and Budleigh would merge separated by little more than Knowle recycling centre. This completely undermines the settlement hierarchy contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 should be selected one which was available, achievable, and suitable in the HELAA. Exmo_20 would cause harm to the adjacent, precious Pebblebed Heath/s (SSSI/SAC/SPA?NNR) due to Exmo_20 being a supportive foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would cause harm to the heritage assets, most significantly the grade II* listed St John in the Wilderness (Saxon, Norman, Medieval site), dramatically and irrevocably altering the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on the adjacent internationally designated wildlife sites and destroy the 'tranquility, wildness and dark skies ' of the countryside, which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors contrary to PARAGRAPH 13.23 of the Local Plan. it would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulation Assessment (30.01.25) states that there is ' currently not sufficient certainty to rule out adverse effects in integrity in relation to ...air quality (East Devon Pebblebed Heaths SAC?SPA) such that the Plan fails the integrity test.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would significantly exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. Further impervious surfaces inevitable in the construction would rapidly speed up surface run off further adding to flood risk below this proposed sloping site directing all water towards Exmouth. This proposed development is in conflict with POLICY AR01B

Exmo_20 would increase the need for car travel, contrary to Figure 7 the energy hierarchy, and would increase traffic congestion, in conflict with PARAGRAPH 11.2. The peripheral and isolated location represents unsustainable development because residents would need to travel much further than 800 metres to reach existing key services and facilities contrary to PARAGRAPH 11.6. It is too far, with relatively steep slopes , from any town centre to use walking or even cycling for all but the very fittest, as their choice of transport and certainly not for those with disabilities and walking aids. This is contrary to POLICY TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Greatly reduce the size of Exmo _20. The proposals are unsound and will for ever damage the environment that renders East Devon attractive.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I believe my voice and opinions are of value and written responses do not fully inform the debate which is needed on such profound proposals which will, if passed, see the permanent destruction of rich open land threaten so much more. There are other solutions to housing needs.

Full name: Marcia Fletcher

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Its time that EDDC pushed back against the Government with the truly valid reasons for not building on this site as well as the poor infrastructure and in particular the ongoing situation with South West Water.

I agree that housing is needed for the town's residents, but this aspect does not seem to have been discussed or agreed anywhere. Bloor was not able to answer who the houses would be aimed at and the last thing the town needs is purchasers who only want second homes. This only kicks the ball down the road. There has been no assurances by the developer of the number of affordable housing (what actually is affordable?), no clear commitment on the size of houses to be built – the town needs more starter homes for young families and smaller homes for elderly residents to downsize into thereby releasing larger family homes.

There needs to be a better process in place to decide what the need is in the town for housing rather than the Government dictating what it wants to 'tick an election commitment'. That approach is lunacy and not democratic or reflective of what the town needs and can accommodate.

Full name: Jill Fowler

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. (The roads are fast and dangerous with blind bends and there are frequent accidents). This is contrary to POLICY TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jill Fowler

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The road is already dangerous with blind bends and several accident blackspots, and in close proximity to a riding school.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Chloe Fox

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to, and disagree with, the stated proposal to build on the site Exmo_17 in the Draft Local Plan, due to the following reasons.

1 One has to take as the worst case scenario, that every resident of Exmo_17 is going to pave over the green space their property might contain, which would cause substantial runoff and trickle-down in southerly and easterly directions from the site. Lower Littleham, where any runoff will end up, already has ongoing flooding issues extra to the flood defence trough. Castle Lane floods every single time we get heavy rain, which is only set to increase according to the Met Office. Littleham Brook overtops regularly flooding both Castle Lane and Littleham Road at the junction by the Bridge. This is a major traffic route taking hundreds of thousands of car journeys a year and any runoff tending towards it, must be avoided. There are simply not enough mitigations that could be made to offset the runoff from a site of 410 homes at the top of a hill, in the heavy rainstorms we experience now.

2 The anti social behaviour in Littleham, at the Midway Estate and in Lower Littleham, has been a problem for at least 20 years and successive Police initiatives have never shifted it. It comes from a lack of youth facilities (which will affect new residents), and the housing of multiple sex offenders, problem families, ex offenders, and drug and prostitution concerns as well as the more ordinary theft, burglary and ASB offences which happen where there is a large council estate and insufficient police patrols due to over-extended and under-resourced local Police. Any new residents will be immediate burglary targets and the area is known for crime (this is confirmed by local crime figures; Littleham is consistently highest in the area). Patrols are very limited and Police are rarely seen here, as this Police Team is overstretched, particularly during school holidays.

3 There is already a town of 2,000 caravans meaning 50,000 families (an estimate) and their associated hundreds of thousands of car journeys, within a mile of the proposed development. The access to this town of Haven Devon Cliffs, is severely restricted to just one approach road, and the access, Littleham Road, has been kept crossing-free due to the high priority DCC and EDDC place upon this route. It brings millions of pounds to the local economy and is the largest Haven site in the country. This town exists between March and November every year and during winter, heavy plant uses the road constantly. This has barely been mentioned in the proposal and pre-pre-approval planning documents for Exmo_17 but the existence of this town, which I'll call Devon Cliffs, means the area is overpopulated already, with millions more car and lorry journeys than residents make.

It is desperately wrong to place yet another development (after Plumb Park, a very highly concentrated Estate at the top of the access road to Devon Cliffs) on the other side of the top of this access road. Effectively Salterton Road will become gridlocked in the summer as everyone tries to access or service Plumb Park, Devon Cliffs, the Midway Estate, Littleham village AND this proposed new site Exmo_17. It is a disastrous proposal.

4 There is serious underinvestment in the infrastructure of this area regarding waste water, resulting in the constant flooding of Lyme Bay with untreated sewage, especially in the winter, the rainy season. EDDC cannot hand this off to South West Water as it has been doing, as EDDC has full knowledge that SWW has no plans to build another treatment works, instead having placed a large outfall to the south, in the sea off Devon Cliffs. Effectively South West Water's solution, which its CEO and shareholders have supported instead of a new treatment works, is to send Exmouth's sewage to sea. This would be merely serious were it not for the reliance of local businesses, not least Devon Cliffs, on the visitor offer which requires clean beaches and a sea that can be safely bathed in by visitors.

EDDC is aware that over 1,000 people are involved in a class action lawsuit by Leigh Day for deprivation of recreation and business receipts due to the dumping of sewage at sea by South West Water and this action is ongoing. It is not a suitable place to add 410 homes which will inevitably load the sewage infrastructure to the point of further critical bursts, such as happened since Plumb Park was built. We can expect multiple bursts at various points along the ageing sewage infrastructure in Exmouth, each of the bursts in the last 2 years has resulted in closing of the beach and large pollution incidents where

the sea has been declared unfit for bathing. Adding 410 homes adjacent to Devon Cliffs and Plumb Park would be a further trigger, in respect to this.

5 The profit made by the landowner is the only reason this site has been put forward. The fields are successfully farmed by the same family, have been for decades and the farm is a going concern providing meat, dairy and arable. The landscape is under useful food production currently, fertile with high yield. Short-term profit is being set against priceless assets in a way which would be unthinkable until recently. The landowner does not care about anything but their own profit, they are certainly not considering residents, Devon Cliffs visitors, or the natural landscape they are supposed to be protecting for future generations. I believe their term is “stewarding” but this is evidently no longer the case.

6 Another factor is the protected status of the National Landscape (previously area of outstanding natural beauty) which relies on the its openness, undeveloped nature, varied and copious wildlife (including an active badger sett in the middle of the site, underneath the cycle path) and bird life, protected hedges, mature trees, and this beautiful prospect has so far been protected against all development by the protections a national landscape /AONB bestows. Those protections still exist or one might as well remove the NL designation from all such areas here. I note that Budleigh Salterton has retained its NL protections and coincidentally this is where the Business Manager of the landowner currently lives. I imagine that if he lived in Littleham, these fields would not be put forward as a site for development. Littleham has as much right to be protected as Budleigh or Sidmouth, it is all part of the National Landscape.

The Council has a statutory duty to “enhance” the “natural beauty” of the landscape. 410 houses cannot and will never do this, just the opposite.

If the site went ahead there would be two small “National Landscape” signs in the middle of a large housing estate, no different from the housing estates our visitors leave at home. They come here for the unspoilt rural nature of this place, if they find housing estates, they will not return. It removes at least 50% of the visitor offer to take away the green fields which give us rurality. It will change the character of this place from rural to suburban and there is no way, unless the houses were underground, that landscaping could “sensitively” mitigate the destruction of the openness, beauty and rurality of this site. Just because the landowner wants to sell his fields, does not mean they should be sold. The landowner is merely trying to make money while house prices are high. The

landowner has repeatedly stated they are a steward of East Devon's beautiful landscape and one wonders how this can be the case when their fields are being sold off for housing at a high rate.

7 EDDC has not made any attempt to negotiate-down the number of houses required by the Government given this area is covered in large part by National Landscape and sensitive areas. There is no attempt made to offer a lesser number of houses in order to have less effect on the landscape. 410 houses is a very large Estate, larger than Plumb Park, which is seen by many as overcrowded and badly planned in its aspects, The developer, Bloor in this case, has no motivation to keep prices low and there is no legal enforcement of the affordable homes target. Bloor could renege on all its pre-development promises and it would be a case of "too late, it's done" with no consequence to Bloor.

8 Bloor admits in its EIA report (25/0002/EIA) there are no dentists and not enough GPs to serve Exmouth as it currently stands, let alone if more residents are added. The one community college has class sizes more than the recommended size and outcomes are not the highest, with bullying and poor results, an ongoing concern for parents. To be honest the number of children may not be very high as the number of working families able to afford these houses will be very low. Plumb Park lowest prices were well over what local families could afford on the poor wages here. Most of the houses were bought as buy to let, second homes, or by retirees/incomers from the southeast. Bloor admits in its report (25/0002/EIA) that incomers will comprise most of the buyers of the proposed housing on Exmo_17.

9 I see that Exmo_17, has gone from being NOT allocated and NOT approved, merely a 2nd choice site for all the reasons I give, to a mysteriously pre-approved status, despite our local plan only being in draft form. I'm aware EDDC has arranged to buy out the Covenant with St Andrews Church which reserved the graveyard field within Exmo_17 for Diocese use, as a graveyard spill-over. Apparently this decision is already made! - Avoiding all democratic accountability and process. I am aware that other developments have taken a back seat and this site Exmo_17 has been virtually pre-approved by EDDC to the point where the role of the Strategic Planning committee may need scrutiny, as the proper democratic process appears to have been undermined, allowing proposals and applications for this site to proceed before the Local Plan has been finalised and with other sites still a possibility.

10 I wondered what was so special about this site Exmo-017 until I realised that having built upon it, the margin of built area will have been extended, paving the way for further development eastwards towards Quentance farm which is the landowner's stated, desired outcome. What we are looking at is the destruction, forever, of a large part of East Devon's National Landscape, a large reduction in the visitor offer, unacceptable infrastructure burden and a reduction in the quality of life for all residents, and particularly a reduction in the quality of the visitor offer for Haven Devon Cliffs customers who would prefer a holiday at a seaside location that isn't covered in dumped raw sewage.

11 The developer's request for EDDC to consider these multiple developments (Exmo_17 and Exmo_20) as stand-alone sites, sidesteps the disastrous effect that multiple large developments will have on Exmouth. The reports Bloor makes, only further Bloor's agenda. It makes no sense to treat Exmo_17 and Exmo_20 as stand-alone sites when the Govt targets are not separated but combined. If the Govt targets are, as stated, over 1,000 homes, the sites have to be considered as cumulative, as they are likely to be built close together in time, to satisfy those targets. In this respect and many others EDDC should view Bloor's representations with an appropriate filter, as Planning Potential (the agent) and Bloor are only acting for themselves/the landowner, and really don't care what happens to Exmouth as a whole, or its residents and visitors. Their reports and letters are a means to an end, ie profit, and should be viewed very carefully.

In summary: This site Exmo_17 should either remain undeveloped or be subject to a rigorous downward reappraisal where a few – a very few – select homes might be built which could be said to reflect the sensitivity of the area and which could blend with the landscape. 410 houses is hundreds too many, and right next to not just the Midway Estate, but to Devon Cliffs, a town of 2,000 multi-occupation caravans, inhabited by around 50,000 people, every year, using GPs, roads, buses, and filling the local supermarkets to capacity, and to which Bloor makes no reference, nor does EDDC make reference. The money made by Devon Cliffs and ploughed back into East Devon's economy, is well in excess of the money CDE would gain from this development.

My response to the proposal to build at Exmo_17 is that we already have Devon Cliffs here with thousands of people, which causes hundreds of thousands of journeys and millions of litres of sewage every year, we rely on our landscape to attract visitors and populate that very busy town, and to serve those customers, so it would be a disaster to negatively affect these visitors and the local residents by the infliction of an overlarge

development in an area known for its beauty, which won't even house local people. EDDC needs to look at other potential sites that are not so close to existing areas of stress on the infrastructure, character, visitor centres and rurality of this area. The visitor offer will be negatively affected by Exmo_17 and I'd like to ask Councillors to remember that they should, and are democratically required to, reflect the views of constituents in this matter. Due to the delicate nature of building on a National Landscape and the impossibility of returning the area to rurality, caution should be exercised, as 410 houses is an enormous burden to place on any landscape, and there are no mitigation measures which could successfully "enhance the natural beauty" of this area once 410 houses are placed upon it.

The development at Haven Devon Cliffs is tucked into a dip/bowl of land so the site is not seen from the main road, the village, or anywhere but the sea. This development, on the other hand, would be highly visible to all people and road travellers in the vicinity and cannot be mitigated due to its oversize. This is not a sensible or practical proposal especially considering its proximity to the Devon Cliffs site, which has first claim on the area's infrastructure and resources, and which requires a clean beach and rural location to maintain its customer base and visitor offer.

I reject the proposal to build at Exmo_17.

Full name: Raymond Franklin

Other party name (if relevant): Judith Franklin

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of land at Exmo_20 is far from sound. We are very concerned that this allocation will have a seriously detrimental impact on the community of Budleigh Salterton and yet no Budleigh Salterton councillors were present at the strategic planning meeting where this allocation was approved. The councillors went against the recommendation of officers and failed to appreciate the devastating impact this huge urbanisation would have on the rural fringe of Budleigh Salterton. Ex_20 would threaten the tranquility, wildness and dark skies of the countryside which is contrary to Policy OL01. The proximity to the Pebblebed Heaths (SAC/SPA) is very worrying and is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. EX_20 would endanger wildlife habitats and corridors, veteran trees and hedgerows. Issues of rainwater run off on this sloping site into the catchment area of Withycombe Brook on heavy clay are a great concern, especially to those with properties further down the water course and is in conflict with Policy AR01B. A particular concern is the inevitable increased traffic on the B3179 which is a busy road and far from safe. Access to the site from this location is an alarming prospect to the regular users of this route. Traffic congestion and parking is already a major problem in Exmouth and this sprawling urban expansion would exacerbate this. The elevation of this site above Exmouth town centre would make cycling or walking unlikely for many residents, making this site unsustainable. The impact of this allocation of land on the distinctly unique character of Budleigh Salterton, which is very different to that of Exmouth, would be disastrous and would lead to the coalescence of Budleigh and Exmouth contrary to Policy OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan, in accordance with the recommendations of planning officers. Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanne Gardiner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Objection to proposed development land Exmo_08 Objection to Proposed Development land Exmo_08 Littleham Fields between Elm Lane and Green Farm. My objection is because the Landscape and Ecology needs to be protected Highways, Access and movement are inadequate Flood Risk and Drainage is High and inadequate. I strongly object to the proposed development on Littleham fields as it will irreversable destroy the environment and have negative impact on local infrastructure and the wildlife in Littleham Village. The following points show why the building proposal on these fields at Littleham needs to be rejected.

- It would over develop a small Village recognised by Tourists as a holiday attraction
- The over development will have a negative impact on local amenities and soul and character of Littleham as well as negative impact on tourism jobs as people will opt to holiday elsewhere.
- Flooding o Additional houses, Road and Parking infrastructure will contribute to additional Surface Water. This will cause further complications to our current flood problems in Littleham. o Littleham River severely floods regularly every year closing Maer Lane by Green Farm and Prathayes Farm causing severe disruption to village life. This prevents traffic movement and emergency services reaching residents and access to Sandy Bay Holiday Park and Country Life Wildlife Park.
- Wildlife o Maer Valley is recognised as an area of outstanding beauty and these Littleham fields and river are part of it. There are rare butterflies, dragon flies that colonette. Countless Bird breeds, Water wading and hedge row birds. Local birds of prey - Owls, Buzzards, and Sparrow Hawks live and hunt here. Colonies of bats roost and fly over the Fields. There are Foxes, Deer and Badgers that frequent the valley fields. Development will disrupt the local eco system. Light Pollution o The additional homes and street lights will turn a dark Valley into a Xmas Tree disturbing the wildlife listed above and will cause to them to leave the area.

- **Traffic/Transport** o Additional homes will equate to additional cars, that will increase the risk of Safety and produce exhaust pollution and road congestion. The introduction of Plumb Park has increased traffic at Littleham Cross, and compounded the traffic flow and rate on Littleham Road, which is already passed breaking point in the Spring/Summer and Autumn seasons due to the 1000, s of cars travelling to and from Sandy Bay.
- **Infrastructure** o Water SWW Authority have had problems historically maintaining a regular high pressure to ensure no disruption to residential homes. During the Tourists season this drops severely and 2022 saw a near drought situation due to the record lack of rainfall causing our Exmouth feeding reservoirs to drop and nearly dry up. More Homes will cause standpipes to be issued. o Sewage SWWA have struggled to keep up with demand of Sewage capacity that builds up in the Summer due to increased residents in the Summer, particularly Littleham sewage works. Over the summer period sewage was expelled into our beaches during peak season. Additional Homes will add to this problem and this should be addressed prior. o Local Primary School COE Littleham, is already over capacity due to Plumb Park new 500+ Homes, and the planning for further 100's Homes cannot occur until this is addressed. o At the Littleham delicate Bridge by Clinton Arms – Littleham Road/West Down Road will not survive increased traffic and already had to be strengthened last year due to slumping. o Emergency Services – Additional pressure on a stretched Police and Fire Services having to service Sandy Bay and the additional new Plumb Park Residents. Adding further Homes just exacerbates the situation o Health Care/Hospitals – already over subscribed
- **Tourism** o Tourists come to Littleham and Exmouth to enjoy the Open Green space. Filling all the available green patches of land with housing and roads will turn Littleham into a large Housing Estate and lose the countryside element.
- **Communities Farming** o Devon needs its farmland for growing and harvesting crops and feeding cattle and sheep on its land. This was demonstrated and been encouraged for farmers to grow crops again to get Britain to be more self-efficient highlighted by the recent Ukraine War and covid pandemic. We must not build on our Farm land that these fields have been used for generations of farmers and used by the local Littleham Farm 'Green Farm'
- **Green land** o all built on and communities, parishes being joined together and losing their identity no gaps in housing and no strips or designated green areas deemed for not developing on. Our Homes are built on Brown reused land formerly a Primary school carpark. The proposal identified utilises Green Land not brown or Grey land.
- **Disruption – Noise/Dirt/Congestion/Pollution** o Major disruption has occurred by the large-scale development of Plumb Park and Pankhurst building developments. There has been damage to the road infrastructure – potholes and surface road subsidence

due to increased traffic and heavy building vehicle. o Due to the steep sloping gradient of the field between Elm Lane and Green Farm, it will require artificial banking this will cause the houses to be elevated blocking the natural sun light enjoyed by the residents creating shadows. All will create more flooding which needs to be addressed as a priority. I object to all developments on these fields .

Full name: Lindsay Gardiner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Objection to proposed development land Exmo_08

Objection to Proposed Development land Exmo_08 Littleham Fields between Elm Lane and Green Farm.

My objective is because the Landscape and Ecology needs to be protected

Highways, Access and movement are inadequate

Flood Risk and Drainage is High and inadequate.

I strongly object to the proposed development on Littleham fields as it will irreversable destroy the environment and have negative impact on local infrastructure and the wildlife in Littleham Village.

The following points show why the building proposal on these fields at Littleham needs to be rejected.

- It would over develop a small Village recognised by Tourists as a holiday attraction

- The over development will have a negative impact on local amenities and soul and character of Littleham as well as negative impact on tourism jobs as people will opt to holiday elsewhere.

- Flooding

- o Additional houses, Road and Parking infrastructure will contribute to additional Surface Water. This will cause further complications to our current flood problems in Littleham.

- o Littleham River severely floods regularly every year closing Maer Lane by Green Farm and Prathayes Farm causing severe disruption to village life. This prevents traffic movement and emergency services reaching residents and access to Sandy Bay Holiday Park and Country Life Wildlife Park.

- Wildlife

- o Maer Valley is recognised as an area of outstanding beauty and these Littleham fields and river are part of it. There are rare butterflies, dragon flies that colonette. Countless Bird breeds, Water wading and hedge row birds. Local birds of prey -Owls, Buzzards, and Sparrow Hawks live and hunt here.

Colonies of bats roost and fly over the Fields. There are Foxes, Deer and Badgers that frequent the valley fields. Development will disrupt the local eco system.

Light Pollution

- o The additional homes and street lights will turn a dark Valley into a Xmas Tree disturbing the wildlife listed above and will cause to them to leave the area.

- Traffic/Transport

- o Additional homes will equate to additional cars, that will increase the risk of Safety and produce exhaust pollution and road congestion. The introduction of Plumb Park has increased traffic at Littleham Cross, and compounded the traffic flow and rate on Littleham Road, which is already passed breaking point in the Spring/Summer and Autumn seasons due to the 1000, s of cars travelling to and from Sandy Bay.

- Infrastructure

- o Water SWW Authority have had problems historically maintaining a regular high pressure to ensure no disruption to residential homes. During the Tourists season this drops severely and 2022 saw a near drought situation due to the record lack of rainfall causing our Exmouth feeding reservoirsto reservoirs drop and nearly dry up. More Homes will cause standpipes to be issued.

- o Sewage SWWA have struggled to keep up with demand of Sewage capacity that builds up in the Summer due to increased residents in the Summer, particularly Littleham sewage works. Over the summer period sewage was expelled into our beaches during peak season. Additional Homes will add to this problem and this should be addresses prior.

- o Local Primary School COE Littleham, is already over capacity due to Plumb Park new 500+ Homes, and the planning for further 100's Homes cannot occur until this is addressed.

- o At the Littleham delicate Bridge by Clinton Arms – LittlehamRoad/West Down Road will not survive increased traffic and already had to be strengthened last year due to slumping.

- o Emergency Services – Additional pressure on a stretched Police and Fire Services having to service Sandy Bay and the additional new Plumb Park Residents. Adding further Homes just exacerbates the situation

- o Health Care/Hospitals – already over subscribed

- Tourism

- o Tourists come to Littleham and Exmouth to enjoy the Open Green space. Filling all the available green patches of land with housing and roads will turn Littleham into a large Housing Estate and lose the countryside element.

- Communities Farming

- o Devon needs its farmland for growing and harvesting crops and feeding cattle and sheep on its land. This has been demonstrated and encouraged for farmers to grow crops again to get Britain to be more self-efficient highlighted by the recent Ukraine War and covid pandemic. We must not build on our Farm land that these fields have been used for generations of farmers and used by the local Littleham Farm 'Green Farm'

- Green land

- o all built on and communities, parishes being joined together and losing their identity with no gaps in housing and no strips or designated green areas deemed for not developing on. Our Homes are built on Brown reused land formerly a Primary school carpark. The proposal identified utilises Green Land not brown or Grey land.

- Disruption – Noise/Dirt/Congestion/Pylon's

- o Major disruption has occurred by the large-scale development of Plumb Park and Pankhurst building developments. There has been damage to the road infrastructure – potholes and surface road subsidence due to increased traffic and heavy building vehicle.

- o Due to the steep sloping gradient of the field between Elm Lane and Green Farm, it will require artificial banking this will cause the houses to be elevated blocking the natural sun light enjoyed by the residents creating shadows.

All will create more flooding which needs to be addressed as a priority.

I object to all developments on these fields .

Full name: DIANE GEE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than to Exmouth, making Budleigh its most convenient town. The services and infrastructure of Budleigh (High Street, doctors, school, beach, etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan. Current local residents find it impossible at times even in winter to park for services and shopping and in the summer the roads are already highly congested. Exmo_20 would greatly increase the numbers of cars needed for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The narrow country roads would not support such a large concentrated volume of extra traffic. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01b. The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. The Pebblebed Lowland Heaths are internationally recognised as being of importance. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations Assessment (30.01.25) confirms that there is currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is

in conflict with POLICY OL09 and POLICY PB04. Exmo_20 would destroy the tranquillity, wildness and dark skies of the countryside, which is contrary to POLICY OL01. Exmo_20 would have significant adverse effects on St John in the Wilderness Grade 2* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jackie Gennesy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There should be no development on National Landscape land Type of houses proposed not suitable for Exmouth requirements

Full name: Richard George

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The mail access point of Exmo_20 is significantly closer to Budleigh than Exmouth, making Budleigh it's most significant town. The services and infrastructure of Budleigh would be the preferred choice for new Exmo_20 residents. This would lead to a coalescence of Budleigh and Exmouth undermining the settlement hierarchy, contrary to POLICY05. Before any further developments are undertaken in the East Devon area, there must be in place, sufficient Doctor Surgeries, Primary and Secondary Schools, improved roads, a complete overhaul and upgrade of the sewerage and water systems and services. Electrical and internet supply. Any development that's then undertaken, there must be written into the plans that ALL houses are build with solar panels in place and each property has a water catchment to be used for toilets, washing etc.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan or Reduce the size of Exmo_20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Alison Gibbings

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Final week to 'Have your say' about proposed housing schemes in Exmouth. Do you want to stop building on a protected 'area of outstanding natural beauty' (now renamed National Landscape) on the eastern edge of Exmouth? This is an area the size of 4 football fields that stretches from opposite McDonalds right down to Castle Lane with industrial units next to Salterton Road plus 410-450 houses. There would be one access road with one exit onto Salterton Road. The access road would go straight across the old railway line which is now a well-used wide cycle and I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Hannah Gibbons

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: National planning policy framework. Para 190 p55. ,When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development⁶⁷ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and (Clinton Devon own plenty of other land outside of the National Landscape which could be considered) c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. (Proposed plan to put a road across the cycle path - therefore changing the nature of the path and safe access to all users, increasing risk of injury, reduction in value of an actual designated no vehicle space and therefore the enjoyment of all users)

Government Policy paper 30by30 on land in England: confirmed criteria and next steps
Oct 24

“Protected landscapes will be able to make a contribution to meeting our international commitment to protect 30% of land for biodiversity by 2030, as well as our Environmental Act targets to halt and then reverse the decline in nature.”

“Areas contributing towards 30by30 (30by30 areas) will include land within and beyond Protected Areas. These areas should be well-connected with each other and with the

wider landscape, and should represent the range of wildlife-rich habitats and important species found in England. They will form the core of the Nature Recovery Network, our growing national network of wildlife-rich places, stretching from our cities to countryside, mountains to coast. This should include significant areas of our Protected Landscapes (National Parks, National Landscapes and the Broads), which contain around half of England's priority habitats. We can, and must, go further within Protected Landscapes than other areas to meet our national environmental targets, including 30by30."

OL01: Landscape features "Development would only be permitted where it would not harm the environmental qualities ... including, C) Adverse disruption of a view from a public place... D) aesthetic and perceptual factors such as tranquillity, wildness and dark skies" The current cycle path through the Littleham area provides both tranquillity and wildness which would be lost by the introduction of the proposed EXMO17 development, in particular by putting a road across it and the introduction of hundreds of houses and therefore noise and destruction that comes with that number of subsequent people. In addition the development site can be clearly seen from the SW coastpath at the trigpoint adjacent to East Devon Golf Course as well as the cycle path which passes through the proposed development area.

Emerging plan policy OL02: "The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon: A. Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant);; B. Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest; and East Devon Local Plan 2020 to 2042 –Regulation 19 Plan – February 2025 200 C. Any relevant National Landscape Management Plans will be a material consideration in decision making. This policy will also apply to the Heritage Coast. This policy applies across the whole plan area including the Cranbrook Plan area" How is it possible for a development of over 400 houses to meet criteria A? The term exceptional circumstances is vague and I don't believe that the current housing 'need' is exceptional enough particularly when there are other potential development areas e.g to the north of Salterton Road (this land falls within the same tenancy as the land at Exmo17.

Developing at EXMO17 would give a precedent and would open up the NL to further significant development in the future.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO17 from the local plan

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

National planning policy framework. Para 190 p55. ,When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development⁶⁷ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and (Clinton Devon own plenty of other land outside of the National Landscape which could be considered) c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. (Proposed plan to put a road across the cycle path - therefore changing the nature of the path and safe access to all users, increasing risk of injury, reduction in value of an actual designated no vehicle space and therefore the enjoyment of all users)

Government Policy paper 30by30 on land in England: confirmed criteria and next steps
Oct 24

“Protected landscapes will be able to make a contribution to meeting our international commitment to protect 30% of land for biodiversity by 2030, as well as our Environmental Act targets to halt and then reverse the decline in nature.”

“Areas contributing towards 30by30 (30by30 areas) will include land within and beyond Protected Areas. These areas should be well-connected with each other and with the wider landscape, and should represent the range of wildlife-rich habitats and important species found in England. They will form the core of the Nature Recovery Network, our growing national network of wildlife-rich places, stretching from our cities to

countryside, mountains to coast. This should include significant areas of our Protected Landscapes (National Parks, National Landscapes and the Broads), which contain around half of England's priority habitats. We can, and must, go further within Protected Landscapes than other areas to meet our national environmental targets, including 30by30."

OL01: Landscape features "Development would only be permitted where it would not harm the environmental qualities ... including, C) Adverse disruption of a view from a public place... D) aesthetic and perceptual factors such as tranquillity, wildness and dark skies" The current cycle path through the Littleham area provides both tranquillity and wildness which would be lost by the introduction of the proposed EXMO17 development, in particular by putting a road across it and the introduction of hundreds of houses and therefore noise and destruction that comes with that number of subsequent people. In addition the development site can be clearly seen from the SW coastpath at the trigpoint adjacent to East Devon Golf Course as well as the cycle path which passes through the proposed development area.

Emerging plan policy OL02: "The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon: A. Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant);; B. Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest; and East Devon Local Plan 2020 to 2042 –Regulation 19 Plan – February 2025 200 C. Any relevant National Landscape Management Plans will be a material consideration in decision making. This policy will also apply to the Heritage Coast. This policy applies across the whole plan area including the Cranbrook Plan area" How is it possible for a development of over 400 houses to meet criteria A? The term exceptional circumstances is vague and I don't believe that the current housing 'need' is exceptional enough particularly when there are other potential development areas e.g to the north of Salterton Road (this land falls within the same tenancy as the land at Exmo17.

Developing at EXMO17 would give a precedent and would open up the NL to further significant development in the future.

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 Exmo17 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Roger Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I believe that the proposed development of site EXMO_17, which by its very nature will mean an extension of Exmouth eastward on the currently undeveloped East Devon National Landscape (formerly AONB) towards Budleigh Salterton. Inclusion of EXMO_17 in the East Devon District Council Local Plan fundamentally fails the "Consistent with national policy" soundness test due to severe conflicts with statutory protections, national planning policy, and local policy obligations.

1. Direct Conflict with National Planning Policy Framework (NPPF) The National Planning Policy Framework (NPPF) provides unequivocal legal protection for National Landscapes: Paragraph 176: The highest level of protection must be given to conserving and enhancing landscape and scenic beauty in National Landscapes. Development should be strictly limited in these areas. The proposed extension fundamentally contradicts this principle, as it represents large-scale urban encroachment into a protected landscape. Paragraph 177: Major development in a National Landscape should be refused unless it passes exceptional circumstances tests and is in the public interest. This proposal fails every test: No overriding need: Housing or economic growth objectives do not constitute exceptional circumstances, particularly when alternative sites exist outside protected areas. Alternative locations exist: Other areas within East Devon can accommodate growth without violating protected land status. Severe environmental and landscape harm: The development irreversibly damages the area's ecological integrity, scenic character, and ecosystem services. Legal Precedent: High Court rulings have consistently upheld AONB/National Landscape protections, ruling that "economic development" or "housing targets" do not override statutory protection. The approval of this proposal would invite an immediate legal challenge.

2. Breach of Statutory Duty Under the Countryside and Rights of Way Act 2000 (CROW Act, Section 85) Section 85 of the CROW Act places a mandatory legal duty on public authorities to conserve and enhance the natural beauty of National Landscapes. Any decision that fails to give "great weight" to protection is unlawful. By approving this

proposal, East Devon District Council would be in breach of this duty, making the plan legally indefensible and subject to judicial review.

3. Direct Contradiction of the East Devon Local Plan and Policy Framework The proposed extension also fails to comply with East Devon's own planning policies, making it internally inconsistent and thus unsound: Strategy 46: Landscape Conservation and Enhancement and AONBs Requires that development must enhance, not harm, the special qualities of National Landscapes. The proposal would cause irreversible harm, violating this policy outright. Policy D1: Design and Local Distinctiveness Development must respect and protect local landscape character. The urban expansion into protected countryside undermines the distinctive rural and coastal identity of Budleigh Salterton and its surroundings. Urban Sprawl Prevention & Settlement Separation The merging of Exmouth and Budleigh Salterton is a serious planning concern. National and local policy explicitly protect the distinctiveness of settlements, ensuring they are not lost to uncontrolled expansion.

4. Environmental Destruction and Irreversible Harm The East Devon National Landscape is one of the most ecologically valuable and visually iconic landscapes in the UK. Development would result in: Biodiversity loss: This area hosts legally protected species and priority habitats under the Wildlife and Countryside Act 1981 and the UK Biodiversity Action Plan. Destruction of irreplaceable ecosystems: The undeveloped land acts as a natural carbon sink, floodplain, and wildlife corridor. Increased climate risk: Removing these natural defences increases flood risk, reduces climate resilience, and worsens ecological degradation.

5. Legal Risk of Judicial Review and Government Intervention This proposal is legally indefensible. If included in the Local Plan: It is highly likely to be legally challenged under the CROW Act and NPPF non-compliance. Past judicial reviews have struck down developments in National Landscapes where local authorities failed to provide a lawful justification. Conclusion: The Local Plan is Unsound and Legally Indefensible This proposal directly contradicts national policy, breaches statutory duties, violates East Devon's own Local Plan, and would likely be overturned in court.

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.: To remain legally compliant, policy-

consistent, and defensible, East Devon District Council must exclude this proposal from the Local Plan.

Stated that EDDC should not pursue development in EXMO_17 because they would breach planning law and ultimately would end up in years of litigation and that only Government had the power to change planning law, not EDDC. Or words to

Full name: Scott Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: && Exmo_20 is too near to the Pebblebed Heaths. Your Policy PB01 does not allow this development as this location will cause harm to the Heaths.

&& Dark skies, tranquility and wilderness, as per Policy OL01, will be wrecked by all the housing of Exmo_20 beside Woodbury Common.

&& Wildlife corridor destruction and habitat fragmentation on our Pebblebed Heaths would occur with Exmo_20, contrary to Paragraph 13.23.

&& Paragraph 13.9 would be confounded by Exmo_20 because of the disturbance to irreplaceable habitats and species-rich hedgerows. What about the lovely Dartford Warblers on Woodbury Common?

&& St John in the Wilderness is “listed” and will lose its serene tranquility due to Exmo_20, affecting worshippers and visitors to the graveyard. Policy HE02 will be confounded.

&& There WILL be much more car use with Exmo_20, causing more congestion and fumes, conflicting with Paragraph 11.2.

&& There will NOT be much use of bikes as you think because Exmo_20 is way uphill from the towns Exmouth and Budleigh. This is against your Policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stand up to the government and refuse their extra housing demands!

Full name: Scott Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 will create extra drainage & sewage problems because of the 700+ houses and associated impervious roads, paths, roofs etc. Soakaways won't work due to the clay subsoil. SWWA can't cope with the present population of Exmouth, with many illegal sewage dumps into the sea last year. Policy AR01B is contravened because you will flood Exmouth! You may be able to build the huge extra sewage and drainage pipes needed but SWWA won't be able to process this extra effluent, will they?

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.: Scrap Exmo_20 altogether

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: &&
There's serious risk of flooding down to the lower-lying town of Exmouth. Exmo_20 site has clay under soil meaning it's poor at absorbing water, so encouraging run off during storms. If you ignore your own Policy AR01B and cover this with roads, paths, roofs and hard standing aprons, you will further increase run-off. No doubt you will say that this can be accommodated by installing drains.... but where will these drains go? Probably into the sea, along with sewage. Don't tell me this can't happen - it already happened last year, spoiling people's health, their enjoyment of the beach and the holiday trade. SWWA will never have the funds to cope with the extra 700+ houses in your development. Nature is powerful - cast your mind back to 1960 and Withycombe Brook.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: # Exmo-20 entrance on B3179 is nearer to Budleigh than Exmouth. Contrary to Policy OL05, this would effectively merge these two towns.

Policy TR01 is contravened because it's too steep and too far to cycle or walk from Budleigh or Exmouth. It's also isolated from services by being over 800m away, contrary to Para 11.6. Car use would be essential, contrary to Para 11.2 with fumes and congestion. It's unsustainable development!

Exmo_20 is on poorly draining clay soil, uphill from Exmouth, so heavy rain water will not soak away but cascade down causing flooding. Remember 1960? How about the sewage discharges of 2024? So the drains can't cope at present, let alone in the future, even with the minuscule improvements which SWWA have promised. This makes a mockery of Policy AR01B.

St John is presently in the Wilderness. Not for much longer if you go ahead with this awful Exmo_20 bricks and concrete scheme. It's a listed site, deserving tranquility as per your Policy HE02

There's a whole raft of reasons why Exmo_20 should not be so near to the ecologically fragile Pebblebed Heaths. Policies PB01, OL01, OL09, PB04 are contravened, along with Paragraphs 13.9 and 13.23.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Scrap Exmo-20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Thelma Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Full name: Thelma Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: #

Flood risk for Exmo_20 Uphill from Exmouth. Impervious clay soil encourages run off and flooding. Big problems already in 2024 and 1960. SWWA are useless. Conflict with policy AR01B.

bike travel Exmo_20 not likely due to being uphill from Budleigh and Exmouth, contrary to Policy TR01. So more car travel with fumes and congestion contrary to Para 11.2. More than 800m from services, contrary to Para 11.6

St John will no longer be in the WILDERNESS, being surrounded with concrete due to Exmo_20. This tranquil, listed location will be spoiled, contrary to Policy HE02.

Exmo_20 is too close to pebble bed heath of Woodbury Common with its irreplaceable habitats, trees and fragile species and corridors for wildlife, contravening Paragraphs 13.23 and 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Scrap Exmo_20

Full name: Thelma Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

....Exmo_20 is too close to Woodbury Common with its Dartford Warblers and other fragile flora and fauna. This is against Policy PB01

.... Exmo_20 will effectively merge Exmouth with Budleigh, against Policy OL05.

.... Exmo_20 is uphill from Exmouth (and Budleigh) and you won't get many people cycling! They will use their cars (against Policy TR01) More pollution! They will be over 800metres from services, which mitigates against Paragraph 11.6

.... SWWA can't cope with existing floodwater. Imagine how much another 700+ houses would add to this risk with soak-away drains being useless in the heavy clay soil of this area. Exmo_20 is uphill from Exmouth. Policy AR01B is conflicted.

..... St John in the Wilderness will be boxed in with incongruous development, wrecking its tranquil character and disobeying Policy HE02.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: # Local Plan Policy OL05 is contravened by effectively merging Exmouth and Budleigh. Exmo_20 residents would be nearer to Budleigh than Exmouth re services such as doctors, shops, schools

Exmo_20 is more than half mile away from facilities and services, so Para 11.6 is contravened.

More traffic congestion would occur with Exmo_20 because car travel would be essential - this contravenes Para 11.2.

This site, Exmo_20, is a long way UPHILL from Exmouth (or Budleigh), so bike or walking is unlikely and makes nonsense of Policy TR01.

Have you forgotten 1960 when Withycombe Brook flooded? Have you forgotten the tremendous sewage & drainage problems of last year? EXMO-20 is at high altitude, with impervious subsoil, so there's flood risk lower down in Exmouth, contravening Police AR01B. This is exacerbated by concrete roads and driveways and waterproof roof tiles - where is the water going to drain?

St John in the WILDERNESS would be that in name only. Exmo_20 would surround this tranquil area with incongruous development, totally wrecking the environs of this listed churchyard and disregards Policy HE02.

Policy OL01 would encourage the countryside to have TRANQUILITY, WILDNESS and DARK SKIES. Exmo_20 does the exact opposite.

Wildlife corridors and habitats, ancient trees , hedgerows -some irreplaceable - would be wrecked by Exmo_20 due to fragmentation, noise, pollution and disturbance. This goes against Paras 13.9 and 13.23 of Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: scrap Exmo_20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Covering this large clay soil area with roofs, concrete drives, paths and roads will cause big sewage and drainage problems. Remember that Exmouth has frequent sewage spills into the sea causing mayhem for beach users, loss of holiday trade etc. Exmouth can't cope at the moment and It will cost a FORTUNE to bring it up to acceptable present standards, let alone standards to cope with so much extra development. Do you recall the Withycombe Brook flood in 1960?

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.: Abandon EXMO-20

Full name: Martin Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is a comprehensive development scheme in a rural area of East Devon. It is by no means a modest development. It's a rape of what is currently open countryside and conflicts with your para 2.6.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 altogether. If that is not possible, reduce its size to 20%.

Full name: Sarah Gillies

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

- Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

- The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to... air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is an unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre

for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

- The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sophie Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

****Allocating Exmo_20 is in conflict with policy OL09; it would result in pollution that cannot be adequately mitigated against (Habitats Regulations Assessment 30.01.25 highlights this concern).**

Allocating Exmo_20 is contrary to policy PB01 of the Local Plan. It does not adhere to the mitigation strategy of avoidance over mitigation. Developing Exmo_20 would cause adverse effects on internationally and nationally designated site, and could be located upon alternative site that would cause less harm.

****Paragraph 11.6(local plan) says that larger developments should be within 800m of key services and facilities. Exmo_20 is an enormous development but most of the site is much further than 800m from any services and facilities. Only very Southern parts fall within 800m. It is several miles away from actual town and too steep for people to want to walk. **Exmo_20 is in conflict with Policy TR03. it is too remote for sustainable travel; too far from the train station to commute to Exeter by train, and cycle paths in Exmo_20 won't create sustainable travel because there are not cycle paths from Dinan way into Town.**

****Exmo_20 is contrary to Paragraph 11.2 of the local plan(significant developments should be at locations which can be made sustainable through reducing the need to travel). The majority of residents would drive everywhere, having to go up to the B3179 then back down to Exmouth, taking more and longer journeys, doing many more miles.**

****Exmo_20** is contrary to Paragraph 11.2 of the local plan(significant developments should be at locations which can be made sustainable through reducing the need to travel). The majority of residents would drive everywhere, having to go up to the B3179 then back down to Exmouth, taking more and longer journeys, doing many more miles.

Policy TR01 says that walking and cycling should be the natural first choice from developments. Walking and cycling would never be a choice from **Exmo_20** because it is too far away from; town centre/train station/cinema, sports centre etc. Even if they make cycle routes within the development there are not cycle routes leading from **Exmo_20** into the town and it is not a good area to cycle.

****Allocation of Exmo_20** conflicts with paragraph 13.23 of the Local Plan. It would fragment many wildlife corridors, reduce biodiversity and isolate and destroy habitats. It sits within SNA 368 on the proposed Nature Recovery Network. It connects existing habitats and provides a wildlife corridor between the SAC/SPA/SSSI and the coast.

****Exmo_20** is in conflict with Policy PB 04;it would affect the integrity of a site protected under the Conservation of Habitats and Species Regulations 2017 including SAC/SPA).

****Allocation of Exmo_20** would adversely affect the natural environment and result in great biodiversity loss on the actual site and on the adjacent SAC/SPA/SSSI, in conflict with Paragraph 2.10 objective 8 of the Local Plan. ****Exmo_20** is in conflict with HE02. It will destroy the distinctive remote setting of grade 2* listed St Johns church. ****Exmo_20** is in conflict with OL01. Massive volumes of traffic running up through the entire length of the site will unavoidably destroy the dark skies, tranquility and wildness of this massive area of open countryside.

****Exmo_20** would encourage settlement coalescence between Exmouth and Budleigh, contrary to Policy OL05. It is 2.2 miles from Budleigh yet 4 miles from Exmouth and functionally connects the two towns. ****Exmo_20** is in conflict with paragraph 3.30(local plan). It is unacceptable to move the settlement boundary right up adjacent to the SAC/SPA/SSSI, leaving it dependant on specific individual policies for its protection.

Exmo_20 is in conflict with local plan paragraph 3.34. Neither Exmouth(despite being a tier 1 town)nor Budleigh (whose infrastructure and services would be relied upon by **Exmo_20**) have sufficient existing infrastructure and services to support such a significant increase in development.

Exmo_20 is not a development within Exmouth. It is twice as far to Exmouth as to Budleigh Salterton from the point of accessing the site, and is one of the most significant levels of development but is NOT at the principal centre of Exmouth in any way other than name, thus creating conflict within the local plan(policy SP01)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove Exmo_20 from the local Plan/select another site as an alternative to Exmo_20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure Exmo_20 is reconsidered

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 lies within the rainwater catchment area for Withycombe Brook, already an identified flood risk. It is on heavy clay subsoil and is a steep site running down towards Withycombe and Exmouth. Exmo-20 would increase vulnerability to flood risk through the lower lying part of Exmouth. To allocate Exmo is contrary to NPPF 162 which states that plans should take into account the long term implications for flood risk. The Local Plan should plan for climate change and “avoid increased vulnerability to the range of impacts arising from climate change.” (NPPF 164). A flood risk Assessment should have been carried out. Allocation of Exmo_20 is not sound nor justified; it is in conflict with NPPF 178 and the Local Plan policy AR01B; it does not provide wider sustainability and it does increase the flood risk elsewhere.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To have my voice heard.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Local Plan, Policy OL03 states that development proposals will only be permitted where they “preserve the visual integrity, identity and scenic quality of the district” and identifies as particularly important “night time views of dark skies, particularly where lighting is to be introduced in areas of low existing light pollution”. Exmo_20 is in total conflict with this policy. It is a vast area of night time dark skies with currently very low/non-existent light pollution. The expanse of dark skies is an inherent part of the integrity, identity and scenic quality of the area. The light pollution which would accompany Exmo_20 would unavoidably destroy this; in addition to the light from the housing development itself, the vehicular access point to the site being onto the B3179 would result in a regular, nightly stream of headlights destroying the darkness across the entire length of the site, approximately 0.8km. Allocation of Exmo_20 conflicts with Policy OL03 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Local Plan states that “permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates including smell, fumes, dust, grit, smoke and soot...F. Pollution of sites of wildlife value”. The allocation of Exmo_20 is in conflict with this: the Habitats Regulations Assessments (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity to...air quality (East Devon Pebblebed Heaths SAC/SPA). This is due to the primary access for Exmo_20 being onto the B3179 which would send an enormous amount of traffic along the SAC/SPA boundary.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not place the access point for Exmo_20 onto the B3@79, sending significant amounts of traffic along the boundary to the SAC/SPA.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure integrity of the SAC/SPA is not compromised.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is contrary to the Local Plan paragraph 2.10, objective 8. It would adversely affect the natural environment and result in the loss of much biodiversity. It lies within a strategic Nature Area on the proposed Nature Recovery Network, identified as key in preserving and enhancing biodiversity. It contains many veteran and mature trees and allocation of Exmo_20 would cause loss of irreplaceable habitats (defined in the NPPF as “habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed “). NPPF 193 states that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient o veteran trees should be refused unless there are wholly exceptional circumstances”. Allocation of Exmo_20 is therefore unsound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that irreplaceable habitats are not destroyed.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Paragraph 2.6 of the Local Plan states that “Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development”. Allocation of Exmo_20 conflicts with this. Although on the edge of Exmouth, this agricultural site is entirely rural in character and typical of rural East Devon. Exmo_20 is not ‘modest’ development; it is a very significant, “comprehensive development scheme” and as such is not in accordance with The Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan or revert to Exmo_20b as per the original allocation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To allocate Exmo_20 is contrary to policy HE02 of The Local Plan. This states that “proposals for development...will be expected to: Be sympathetic to the listed building and its setting”. Exmo_20 is totally at odds with the setting of St John in the wilderness Church. The area around St John in the Wilderness Church is characterised by a strong sense of remoteness and tranquility, providing a timeless, remote ‘wilderness’ setting for those who worship here. This setting is integral to the character of the grade II* listed church and nearby listed buildings and would be destroyed by having a housing estate encircling it, even with a token ‘buffer zone’ left around it. To allocate Exmo_20 is not sound according to policy HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

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 have my voice heard.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Site Selection Methodology document which appears in the reg 19 Draft Local Plan evidence library is not the version which was used for the reg 18 stage; an amended version has been submitted to the evidence library - this was amended AFTER the SPC approved the Draft Local Plan on 21.12.24. Methodology was altered retrospectively to remove conflict within the Local Plan. Exmo_20 failed the HELAA assessment; it was deemed “available but not suitable or achievable”, therefore according to the methodology in use at the time Exmo_20 was unable to be selected, and was accordingly omitted from Stage 3 Site Assessments. AFTER the Draft Local Plan had been approved (with Exmo_20 having reappeared and been selected), wording of the site selection methodology was altered to enable sites which had failed site sifting at stage 2 to be carried forward to stage 3 “in exceptional circumstances”, and to state that “such cases will be clearly justified”. There is no agreed definition of what constitutes ‘exceptional circumstances’, nor is any ‘clear justification’ given. Furthermore, despite Exmo_20 having failed the HELAA assesment, sustainability Appraisal Report (Feb 2025) states that it was “assessed as suitable, available and achievable”. Neither the decision-making process nor the evidence base have been sufficiently transparent, robust or well documented to be considered sound, and to have amended the evidence base retrospectively to fit the plan makes it hard to consider the process legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Site Selection Methodology document which appears in the reg 19 Draft Local Plan evidence library is not the version which was used for the reg 18 stage; an amended version has been submitted to the evidence library - this was amended AFTER the SPC

approved the Draft Local Plan on 21.12.24. Methodology was altered retrospectively to remove conflict within the Local Plan. Exmo_20 failed the HELAA assessment; it was deemed “available but not suitable or achievable”, therefore according to the methodology in use at the time Exmo_20 was unable to be selected, and was accordingly omitted from Stage 3 Site Assessments. AFTER the Draft Local Plan had been approved (with Exmo_20 having reappeared and been selected), wording of the site selection methodology was altered to enable sites which had failed site sifting at stage 2 to be carried forward to stage 3 “in exceptional circumstances”, and to state that “such cases will be clearly justified”. There is no agreed definition of what constitutes ‘exceptional circumstances’, nor is any ‘clear justification’ given. Furthermore, despite Exmo_20 having failed the HELAA assessment, sustainability Appraisal Report (Feb 2025) states that it was “assessed as suitable, available and achievable”. Neither the decision-making process nor the evidence base have been sufficiently transparent, robust or well documented to be considered sound, and to have amended the evidence base retrospectively to fit the plan makes it hard to consider the process legally compliant.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure the allocation process is robust, transparent and fair

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with Policy PB01. This policy deals with the “Protection of internationally and nationally important wildlife sites” and states that development that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless they cannot be located on alternative sites that would cause less or no harm. Exmo_20 is adjacent to East Devon Pebblebed Heaths(SPA/SAC/SSSI); the only double designated wildlife site in the South West. Nightjar (listed as Annexe 1 species in the Habitats Directive) are one of the qualifying features for the SPA., and Exmo_20 is a supporting habitat for Nightjar. Studies show that loss of foraging habitat or disruption to routes to feeding areas for Nightjar could undermine the conservation objectives of the SPA. Other sites shown as preferred within the agenda for the strategic planning Committee 03.09.24 should have been allocated as an alternative to Exmo_20. The mitigation hierarchy of prioritising avoidance over mitigation (embedded in The Environment Act 2021, The Environment Impact Assessment Regulations(EIA) 2017, the National Planning policy Framework, The Conservation of Habitats and Species Regulations (2017) and other legislation) has not been followed. The allocation of Exmo_20 is not in accordance with the Local plan nor any of the aforementioned legislation, therefore cannot be sound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the Local Plan. Allocate on an alternative site that would cause less or no harm.

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 see that legislation is followed.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Site Selection methodology used for the Regulation 18 stage states that “It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but if not, such sites should be sifted out at stage 2”.(Site Selection methodology May 22, Subtext point 6). Exmo_20 was ruled out as being unsuitable in the HELAA, yet despite being within 400m of the Pebblebed Heaths appeared again at stage 4 and was allocated. AFTER the Draft Local Plan had been approved the Site Selection methodology was amended and the above clause removed. The version of Site Selection Methodology presented in the evidence library of the Draft Local Plan is not the version used for reg 18. Having selected Exmo_20 the Built Up Area Boundary was then extended up to the Pebblebed Heath boundary to include the 400m buffer zone and, specifically, to include this site.

This is totally inconsistent with the approach towards Exmo_04, also within 400m of Pebblebed Heath. In this case the top section of the site was rejected “due to major adverse biodiversity effect arising from its location within 400m Pebblebed Heaths exclusion zone” and the bottom part of the site was allocated.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the 400m Pebblebed Heath buffer zone from allocation Exmo_20, in accordance with the methodology used in allocation, and in the interests of consistency across sites.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Selection methodology used for the Regulation 18 stage states that “It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but if not, such sites should be sifted out at stage 2”.(Site Selection methodology May 22, Subtext point 6). Exmo_20 was ruled out as being unsuitable in the HELAA, yet despite being within 400m of the Pebblebed Heaths appeared again at stage 4 and was allocated. AFTER the Draft Local Plan had been approved the Site Selection methodology was amended and the above clause removed. The version of Site Selection Methodology presented in the evidence library of the Draft Local Plan is not the version used for reg 18. Having selected Exmo_20 the Built Up Area Boundary was then extended up to the Pebblebed Heath boundary to include the 400m buffer zone and, specifically, to include this site.

This is totally inconsistent with the approach towards Exmo_04, also within 400m of Pebblebed Heath. In this case the top section of the site was rejected “due to major adverse biodiversity effect arising from its location within 400m Pebblebed Heaths exclusion zone” and the bottom part of the site was allocated.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the 400m buffer zone from Exmo_20 in accordance with the methodology used in allocation, and in the interests of consistency across sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that the process is being carried out transparently and with consistency.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Site Selection Methodology document which appears in the reg 19 Draft Local Plan evidence library is not the version which was used for the reg 18 stage; an amended version has been submitted to the evidence library - this was amended AFTER the SPC approved the Draft Local Plan on 21.12.24. Methodology was altered retrospectively to remove conflict within the Local Plan. Exmo_20 failed the HELAA assessment; it was deemed “available but not suitable or achievable”, therefore according to the methodology in use at the time Exmo_20 was unable to be selected, and was accordingly omitted from Stage 3 Site Assessments. AFTER the Draft Local Plan had been approved (with Exmo_20 having reappeared and been selected), wording of the site selection methodology was altered to enable sites which had failed site sifting at stage 2 to be carried forward to stage 3 “in exceptional circumstances”, and to state that “such cases will be clearly justified”. There is no agreed definition of what constitutes ‘exceptional circumstances’, nor is any ‘clear justification’ given. Furthermore, despite Exmo_20 having failed the HELAA assesment, sustainability Appraisal Report (Feb 2025) states that it was “assessed as suitable, available and achievable”. Neither the decision-making process nor the evidence base have been sufficiently transparent, robust or well documented to be considered sound, and to have amended the evidence base retrospectively to fit the plan makes it hard to consider the process legally compliant.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Site Selection Methodology document which appears in the reg 19 Draft Local Plan evidence library is not the version which was used for the reg 18 stage; an amended version has been submitted to the evidence library - this was amended AFTER the SPC approved the Draft Local Plan on 21.12.24. Methodology was altered retrospectively to remove conflict within the Local Plan. Exmo_20 failed the HELAA assessment; it was deemed “available but not suitable or achievable”, therefore according to the methodology in use at the time Exmo_20 was unable to be selected, and was accordingly omitted from Stage 3 Site Assessments. AFTER the Draft Local Plan had been approved (with Exmo_20 having reappeared and been selected), wording of the site selection methodology was altered to enable sites which had failed site sifting at stage 2 to be carried forward to stage 3 “in exceptional circumstances”, and to state that “such cases will be clearly justified”. There is no agreed definition of what constitutes ‘exceptional circumstances’, nor is any ‘clear justification’ given. Furthermore, despite Exmo_20 having failed the HELAA assessment, sustainability Appraisal Report (Feb 2025) states that it was “assessed as suitable, available and achievable”. Neither the decision-making process nor the evidence base have been sufficiently transparent, robust or well documented to be considered sound, and to have amended the evidence base retrospectively to fit the plan makes it hard to consider the process legally compliant.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To see that the decision making process is being carried out transparently and robustly.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo 20 is not consistent with National Policy. NPPF States that Plans should “be shaped by early, proportionate and effective engagement between plan makers and communities....and statutory consultees”. Natural England, a statutory consultee, was not consulted on this site despite it adjoining a SAC/SPA/SSSI.

Neither was there any engagement with Budleigh Salterton Town Council despite the fact that the development will rely primarily on the infrastructure and services of Budleigh (from vehicular access point of Exmo_20 it is almost twice the distance to Exmouth town centre as to that of Budleigh). The Town Council is a ‘prescribed body’ which will be directly and significantly affected by the development of Exmo_20.

There was no effective engagement with communities about Exmo 20. It was a site which had failed HELAA as “available but not suitable or achievable”, a ‘rejected’ site throughout the period of community engagement and was clearly marked in red as such on all the maps available and shown to the public. From the time it was allocated on 03.09.24 there was no opportunity for communities to engage nor has there been any opportunity for engagement since, despite repeated attempts by members of the community.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure allocation of Exmo_20 is duly reconsidered

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 is in direct conflict with the Local Plan, Policy PB02, and not in accordance with the Environment Act 2021. Policy PB02 states that development proposals that would cause adverse effects upon important wildlife sites will not be permitted unless they cannot be located on alternative sites which would cause less or no harm. The development proposed at Exmo_20 will cause adverse effects upon important wildlife sites (Pebblebed Heaths) and could be located on alternative sites which would cause less or no harm. It also states that it must be ensured that there is no degradation to the wider ecological networks and priority habitats. Exmo_20 sits within a 'Strategic Nature Area' (SNA 368) on the proposed Nature Recovery Network connecting the coast to the SAC/SPA/SSSI as part of the Local Nature Recovery Strategy. According to the Environment Act 2021 EDDC has a legal responsibility as a supporting authority to ensure that the planning system dovetails with the Local nature Recovery Strategy to avoid conflicting steers for the same piece of land. Exmo_20 is in direct conflict with this.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Neither the Local plan nor national policy were followed in the allocation of Exmo_20. Chapter 13, paragraph 13.5 of the Local Plan states that "All proposals should follow the mitigation hierarchy: first avoid biodiversity impacts; if unavoidable mitigate them". Sites were not selected with regard to the mitigation strategy; the initial Habitats Regulations Assessments was done after the plan was agreed for publication and many sites near to Exmo_20 were rejected for reasons which fall lower down the Mitigation Hierarchy and should have been allocated in preference to Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure allocation of Exmo_20 is reconsidered

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Local Plan (paragraph 3.7, appendix 6, Stage 3. 1.33) states that “The site assessment ensures a consistent level of information is available for each site, to inform site selection”. The allocation of Exmo_20 was not in accordance with this and is not sound. Having failed the HELAA, Exmo_20 did not go through the assessment stage of the Site Selection process and there was minimal information available to councillors regarding Exmo_20 compared with the details given about other sites. No attempt was made to gather or provide the relevant information which would have enabled consistency in site selection. The site boundary of Exmo_20 shown to councillors when selecting sites was wildly inaccurate compared with other sites and included the grade II* listed St John’s church, several listed buildings and numerous privately owned homes (approximately one third of the site voted on by councillors is unavailable). This had been brought to the attention of the SPC several times since August 2022 but no attempt was made to correct it and it was not amended until 22.11.24. by which time site allocations we’re no longer being assessed or revisited. This is inconsistent with the detail with which other sites were scrutinised.

The site is of heavy clay subsoil and sits on the main rainwater catchment area of Withycombe Brook, already an identified flood risk - information not given to councillors when allocating Exmo_20, yet the clay subsoil and the far lesser flood risks other sites would potentially cause were discussed extensively and consequently given as the reason for them not being allocated). The level of information available for Exmo_20 was totally inconsistent with the level of information available for other sites.

The greatest and most concerning level of inconsistency has been shown in the way information was considered regarding the 400m Pebblebed Heath Impact Risk Zone. In

the case of Exmo_04 which, like Exmo_20, has part of the site falling within 400m of Pebblebed Heath it was judged for this reason appropriate only to select part of the site (the bottom part - not within 400m), and to reject part (the top part - within 400m). This is totally at odds with the way Exmo_20 was allocated in its entirety including the land within the 400m buffer zone. There was no consistency shown. The fact that the Exmo_20 adjoins the SAC/SPA/SSSI was not even mentioned in the SPC meetings despite proximity to the SAC/SPA/SSSI being thoughtfully discussed in the case of other sites at greater distances from the Pebblebed Heaths. Site assessment has not ensured a consistent level of information was available for each site; there was minimal information gained from site assessment of Exmo_20, because minimal assessment was undertaken of Exmo_20 compared with other sites. Had Exmo_20 passed HELAA and gone through stages 1,2, and 3 of the site selection process it would have undergone site assessment and the levels of information available for it would have no doubt been more consistent. As the process happened, allocation of Exmo_20 was not been carried out in accordance with The Local Plan, (paragraph 3.7, appendix 6, Stage 3. 1.33).

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.: Exclude the top 400 buffer zone from site Exmo_20 and from the Built Up Area Boundary.

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 ask that Exmo_20 is treated consistently with other sites, and the 400m buffer zone consistently given the same protection across sites.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: In allocating Exmo_20 EDDC have failed in their duty to co-operate with Budleigh Town Council. The Planning and Compulsory Purchase Act 2004 states that The Local Authority must co-operate with every body that is “prescribed or of a prescribed description” in the preparation of development plan documents and other development documents. Budleigh Salterton Town Council are a prescribed body, yet EDDC failed to even make it aware of this development. Allocation of Exmo_20 is critical to Budleigh Town Council; with vehicular access to the site being only 2.3 miles away from Budleigh Salterton but 4.0 from Exmouth Town centre the development would be primarily reliant on the services and infrastructure of Budleigh Salterton which, as a tier 3 town, would be totally unable to cope.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that my voice and opinions are heard.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 was not in accordance with the NPPF (chapter 3, paragraph 16c) which states “The right information is crucial to good decision-making, particularly where formal assessments are required (such as Habitats Regulations Assessments...)”. Councillors were simply not in possession of the right information when they voted on allocation of Exmo_20. They did not have the results of the Habitats Regulations Assessments.

A member of the Strategic Planning Committee directly expressed her discomfort at the committee not having seen the Habitat Regulation Assessments (and other evidence). (SPC meeting 04.02.25, 1:15). She suggested that by not having access to these documents before regulation 19 consultation and without the information having gone through committee and been discussed, it raised the question of whether the Draft Local Plan could be considered Sound and Legally robust. The Habitats Regulations Assessments and other missing evidence was referred to by The Assistant Director – Planning Strategy and Development Management, as “bits and bobs”, and it was considered satisfactory to go to regulation 19 consultation without them. THIS RENDERS THE ALLOCATION OF EXMO _20 IN DIRECT CONFLICT WITH NPPF. The initial HRA was published AFTER the plan was agreed for regulation 19 publication, therefore did not inform the plan making process, and sites were not selected with regards to avoidance over mitigation as is dictated in the Conservation of Habitats and Species Regulations 2017.

In addition to this, also not in accordance with NPPF, (Chapter 3, paragraph 16c), members of the SPC did not have the right information in terms of site boundaries. The map shown to the SPC when they voted on sites was massively inaccurate and the

boundary of Exmo_20 depicted approximately 1/3 more land than was available, including a substantial listed heritage site (St Johns in the Wilderness church and churchyard), a large area of SAC/SASI impact risk zone, and a considerable number of privately owned properties. Numerous attempts were made by members of the community to get the map amended to inform councillors of the actual land available but to no avail, until it appeared corrected in the reg. 19 Draft Local Plan. To make decisions based on misleading, incomplete and inaccurate information is inconsistent with national policy and demonstrates total disregard for the Nolan principles.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: With regards to Exmo_20 EDDC have failed in their duty to co-operate. The Local Plan (Paragraph 12.31) states that “The Council will consult statutory pollution control authorities at an early stage for proposals that may raise pollution concerns. This ensures that developments are assessed for their potential impacts on health, the natural environment and amenity.” Councillors allocated Exmo_20, a site adjoining a SAC/SPA/SSSI without consulting either statutory pollution control authorities or Natural England to consider pollution concerns.

Natural England’s ‘standing advice’, as a statutory consultee, given to LPAs is that

“You must consult Natural England if a development proposal: * might affect a site of special scientific interest (SSSI) * needs an environmental impact assessment * needs an appropriate assessment under the Habitats Regulations”

Natural England were not consulted on this site. The only engagement had with Natural England was when they were invited to comment on the whole of the draft Local Plan, at the point when Exmo_20 was a rejected site.

Exmo_20 was allocated before the initial Habitats Regulations Assessment was published on 30.01.25, which concluded that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. There is currently no suitable mitigation for this. As a result of failing in their duty to do-operate EDDC have allocated Exmo 20 against the principles of the

mitigation hierarchy of Natural England; to prioritise avoidance over mitigation. The mitigation hierarchy is a fundamental principle in achieving Biodiversity Net Gain in England. By prioritising avoidance, minimising losses, and resorting to compensation only when necessary, developers can help protect and enhance biodiversity. (6 Feb 2025)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: With regards to Exmo_20 EDDC have failed in their duty to co-operate. The Local Plan (Paragraph 12.31) states that “The Council will consult statutory pollution control authorities at an early stage for proposals that may raise pollution concerns. This ensures that developments are assessed for their potential impacts on health, the natural environment and amenity.” Councillors allocated Exmo_20, a site adjoining a SAC/SPA/SSSI without consulting either statutory pollution control authorities or Natural England to consider pollution concerns. Natural England’s ‘standing advice’, as a statutory consultee, given to LPAs is that

“You must consult Natural England if a development proposal: * might affect a site of special scientific interest (SSSI) * needs an environmental impact assessment * needs an appropriate assessment under the Habitats Regulations”

Natural England were not consulted on this site. The only engagement had with Natural England was when they were invited to comment on the whole of the draft Local Plan, at the point when Exmo_20 was a rejected site.

Exmo_20 was allocated before the initial Habitats Regulations Assessment was published on 30.01.25, which concluded that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. There is currently no suitable mitigation for this. As a result of failing in their duty to do-operate EDDC have allocated Exmo 20 against the principles of the mitigation hierarchy of Natural England; to prioritise avoidance over mitigation. The mitigation hierarchy is a fundamental principle in achieving Biodiversity Net Gain in England. By prioritising avoidance, minimising losses, and resorting to compensation only when necessary, developers can help protect and enhance biodiversity. (6 Feb 2025)

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Policy SP01 of the Local Plan proposes that the most significant levels of development will be at the principal centre of Exmouth. Allocation of Exmo_20 is contrary to this as the site is completely detached from Exmouth town and is actually closer to Budleigh Salterton. Although the housing might be situated at the lower end of the site, the vast majority of the access into and out of the site would be from the very top of the site onto the B3179, resulting in Exmo_20 being a detached and isolated housing estate. From the southern end of the site to access to the train station on foot, to commute to Exeter for example, takes 50 minutes at a brisk pace. From the northern end of the site it takes 1 hour 15 minutes. Exmouth town centre is a 4 mile drive from the vehicular access point of Exmo_20, and the steep topography of the site makes walking and cycling unviable options. Budleigh Salterton is much closer and more accessible from the site access point, being only 2 miles from this point. It is an Exmouth development in name only and in functional terms is not development at the principal centre of Exmouth. Existing housing development already stretches several miles out from the town centre which has not managed to grow with the increased population. With the access to Exmo_20 all being at the northern edge of the site this development cannot be considered to be at the Principal Centre of Exmouth.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from The Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that Exmo_20 is given proper consideration.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable during HELAA. It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like to see that there is integrity in the process and that it is being adhered to.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: On 3/9/24 EXMO_20 went from 'ongoing assessment' to 'allocated' and no further consideration or representation was given to the public or the Strategic Planning Committee despite the assessment not being complete. Exmo_20 did not pass HELAA being deemed "not suitable or achievable". Due to this the plan making process has not been in accordance with the PCPA 2004. stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations.

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.: Restart the process again or remove EXMO_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To exercise my democratic right and see that there is integrity to the set out process.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan or start the process again and include the representation of the public.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to have my democratic right to see if the process is transparent.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to hear how additional drainage won't add to Withycombe brook to an unmanageable level.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Housing cannot be built on the buffer zone, however, by including it within the settlement boundary it is available for other kinds of development. Therefore the plan is failing to robustly protect the Pebblebed heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan or reduce the size of the development.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. Getting from the site entry point on the B3179 it is significantly shorter and quicker to get into Budleigh town then Exmouth town, therefore naturally this will be where people go for key services including doctors, dentists and primary schools. This development clearly merges the two towns and creates coalescence.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan. Reduce the size of the site and ensure there is better access directly into Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like to hear with a primary access point on the B3179 this doesn't lead to coalescence between Budleigh and Exmouth and why Exmouth would be the primary town to rely on for services when they are closer to Budleigh.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the tranquil surroundings of the church and churchyard, drastically altering the rural, peaceful setting for worship which currently exists for the congregation. The outlook from the church will completely change and feel a distinctly different to how it currently feels in the churchyard.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of EXMO_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The area around the site - St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left. The name of the church and the hamlet itself would almost become ironic as it would not be in the wilderness at all. Likewise having an entrance on the B3179 next to the pebble bed heath will cause a constant stream of traffic headlights shining across this protected area which would completely change the feel of it and would have a devastating impact on the bird life wanting to nest there.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan. Substantially reduce the size of it and take away access onto the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation, as well as miles of hedgerows that provide habitats and wildlife corridors. Disrupting and in most instances destroying them will cause a huge loss of wildlife and cannot be replaced by planting new trees and leaving the odd green space.replacement These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. EXMO_20 isn't on the pebblebed heath but it is countryside that is essential to the wildlife that live on it. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan or reduce it and only build on land closer to Exmouth and further from the pebblebed heath.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to understand how conflict to paragraph 13.9 of the National planning policy framework will be avoided.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

LLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI. The proposal of site EXMO_20 is across important wildlife corridors and also its proximity to the pebblebed heath means it will reduce biodiversity, especially within the bird population as there important nesting sites on the Common.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I worry that members of the planning committee don't realise what a unique site Woodbury common is.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 and any other sites that are close to the pebblebed heaths and replace with other sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send the significant increase in traffic caused by the large site along the boundary of the Pebblebed Heath.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan. No access to the B3179 and a reduction of the site size.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the site will vastly increase car and other vehicle movements. This significant additional traffic will be focussed on the B3179 which will be used to access Budleigh Salterton (the nearest town and beach) and Exeter which is the likely place of work for most people living in EXMO_20. The B3179 is not designed for the amount of traffic it already has let alone more, likewise it is especially not suitable for a high volume of large vehicles like lorries and buses. The only way a bus service could serve the needs of residents of EXMO_20 is if it accessed the B3179 and had routed to Budleigh and Exeter but the road is not suitable for these vehicles.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan or reduce it and take away access onto the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to understand and input into how EXMO_20 can have new sustainable travel arrangements to the places they are most likely to go.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth is already severely struggling to provide sufficient infrastructure to its existing population. It is already nearly impossible to get a doctors appointment within a useful time frame and additional surgeries are not a part of this proposal. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is at breaking point that sewage is regularly discharged into the sea resulting in the beach closing for swimming. Beyond the devastating impact on marine life this also damages Exmouth's reputation as a holiday destination and therefore its leisure economy. This was well documented and reported last summer and needs a solution to not create further problems with large scale development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. The main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. This also means from the B3179 site entrance you need to drive a very round about route to get into Exmouth centre, in total over 4 miles. Exmo_20 would undoubtedly significantly increase car miles.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan. Alternatively remove access to the B3179 and reduce the site size keeping it as close to Dinan way and Exmouth town centre as possible.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I want to understand how EXMO_20 could fulfil Paragraph 11.2.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. TR01 states that Walking, wheeling, cycling or public transport should be the natural first choice. It would not be the first choice of transport from EXMO_20 for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. This would not be solved through a public transport service as the only likely one is buses which people would not choose if they have a car. I would argue the distance EXMO_20 is from any services and infrastructure means people will only be able to live there if they have access to a car and are prepared to do the majority of their journeys in it.

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.: Either withdraw EXMO_20 from the local plan or withdraw the access to the B3179 and reduce the site size where people can travel more directly into Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand how the planning committee possibly think this site will achieve policy TR01 when it is so far from any key services.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360 degree development impossible. Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Access from the B3179 will make it closer to Budleigh Salterton then to Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan or significantly reduce the size of Exmo_20 so it is not accessed from the B3179

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure the correct information is outlined when it is considered and I have a concern that the people discussing the allocation don't know the specific details of the area.

Full name: Samuel Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo 20 conflicts with policy. It is not 'modest development', it is 'comprehensive development scheme'.

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 allocation of Exmo 20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Samuel Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The enormous increase in dog walkers that such a massive development would necessarily incur would add so much dog mess that the nutrient levels in the soil would be affected. This conflicts with NPPF 187e.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size massively and keep site access away from B3179 and Pebblebed Heath boundary.

Full name: Samuel Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It conflicts with NPPF 187e. Building 700 homes here will cause an unacceptable increase in levels of air and noise pollution to the Pebblebed Heaths, a SSSI, SAC AND SPA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not allocate this site.

Full name: Mark J Godfrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor’s, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: REMOVE Exmo_20 from the local

Full name: Helen Gottschalk

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access from the development Exo_20 would be onto the B3179, putting extra pressure on an already busy and winding road. Vehicles from 700 houses would add an extra 840 cars (average vehicle per household =1.2) to the local road network, including feeder lanes to Woodbury (Castle Lane) and Exmouth (Higher Marley Road) that would undoubtedly have a negative impact on local residents, wildlife and biodiversity. Residents of Exmo_20 would put enormous pressure on the infrastructure and service provision of Budleigh, as this is the nearest town centre (at 2.3 miles). This undermines the hierarchy settlement leading to the merging of Budleigh and Exmouth, contrary to Policy OL05 of the local plan.

An alternative site, such as a new town, would seem a much more sustainable option, enabling planners to provide employment opportunities with local services and infrastructure that are fit for purpose. It is plain to see that South West Water are TOTALLY incapable of managing current levels of sewage, blaming almost constant overflows and spills on rainfall levels. Looking at Met Office rainfall maps (https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/library-and-archive/library/publications/factsheets/factsheet_7-climate-of-south-west-england_2023.pdf) it is clear to see that East Devon has some of the lowest rainfall in the South West Region - so it is impossible to believe that they would be able to manage any extra capacity set out in the local plan, including that created by Exmo_20

Exmo_20 would also create unprecedented damage to the Pebblebed Heaths, which is a designated NNR /SSSI / SAC / SPA, because this area is a habitat that supports bats such as Daubenton's and Pipistrelles, which are considered European protected species. Allocating Exmo_20 is contrary to the HELAA, the site selection Methodology

and Policy PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would also cause harm to the nationally important sites of Woodbury Castle and St Johns in the Wilderness Grade 11 listed church, contrary to POLICY HE02

Exmo_20 would have a detrimental effect on the open countryside and designated NNR / SSSI / SAC / SPA - destroying the tranquility, wildness and dark skies offered by these important green spaces - contrary to POLICY OL01. It would also have a detrimental impact on the biodiversity of important species such as the Nightjar and Dartford Warbler, currently found on Woodbury Common. East Devon is a significant stronghold for Dartford warblers, holding a substantial portion of the UK and Devon breeding population.

Exmo_20 would be in conflict with the Strategic Nature Area 368, fragmenting and isolating already fragile habitats and destroying wildlife corridors, contrary to paragraph 13.23 of the Local Plan. It would cause irreparable harm to the biodiversity of these protected habitats, veteran trees, hedgerows, and verges, along with the biodiversity of wildflowers and wildlife inhabiting our local hedgerows, woodlands and verges.

Exmo_20 would be built on heavy clay subsoil which could exacerbate the flood risk to properties and land along Withycombe Brook. This is contrary to Policy AR01B.

Exmo_20 would increase the need for car travel, contrary to Fig. 7 - the energy hierarchy, and increase traffic pollution and congestion, contrary to Paragraph 11.2

The isolated location of the suggested development is further away than 800m to existing services and facilities, contrary to Paragraph 11.6. If you have ever been on B3179 you would understand that it would be incredibly dangerous to walk or cycle along this route, especially with children or pets. This is contrary to Policy TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan and replace it with an alternative site, such as a new town, which would seem a much more sustainable option, enabling planners to provide employment opportunities with local services, facilities and infrastructure that are fit for purpose.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Attending a hearing session is my democratic right, allowing me to participate in the decision-making process, present my views, and potentially influence the outcome of a planning application or local plan, ensuring my concerns are heard and considered.

Full name: Sue Govan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo20 would cause harm to the adjoining pebble bed heaths SSSI, SAC, SPA & NNR where scarce nightjars nest as well as many other birds and wildlife. Any light pollution would negatively affect nightjars and their food sources. This is due to Exmo20 being a supporting foraging habitat. Allocating Exmo20 is contrary to the HELAA, the site selection methodology and policy PB01 of the local plan. Exmo20 would have a detrimental affect on the internationally designated wildlife sites, eliminating the tranquility, wildness and dark skies which is contrary to policy OL01. Exmo20 would be in conflict with the strategic nature area 368, fragmenting habitats and destroying wildlife corridors contrary to paragraph 13.23 of the local plan. It would cause harm or remove irreplaceable habitats, old trees and species rich hedgerows across the site contrary to paragraph 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Avoid developing the area near the pebble bed heath, any development further back should have sufficient wildlife corridors and green spaces

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Carol Jane Griffiths

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Access point of Exmo_20 is nearer to Budleigh Salterton than Exmouth. Therefore Budleigh services and infrastructure would more likely be used by Exmo_20 residents. It would lead to conurbation of Budleigh and Exmouth, contrary to POLICY OL05 of Local Plan.

Exmo_20 would cause harm to Heritage assets at St Johns Road - it would destroy the rural setting for St John in the Wilderness Grade 11 listed church. Contrary to Policy HE02. It would cause harm to the Pebblebed Heaths. Its allocation is contrary to the HELAA and Site Selection Methodology and Policy PB01 of the Local Plan. It is so close to the Strategic Nature Area 368 light pollution, noise and traffic will have a detrimental to wildlife and the sites. This is contrary to Paragraphs 13.23 and 13.9 of the Local Plan. Its location would increase the need for car travel, and thus increase volume of traffic on B3179, only a small country lane with no lighting or footpath. Also there is a lot of wildlife crossing this road. Residents of Budleigh use this road to travel to Exeter. One vehicular entrance/exit onto B3179 from a housing estate of 700 will become completely congested at certain times of the day when built, not to mention construction traffic whilst it is being built. This is in conflict with Paragraph 11.2 The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far and too steep to walk or cycle to either Budleigh or Exmouth town centre/seafront. This is contrary to Policy Policy TR01. At present there is no public transport in that area. People move to Exmouth/ Budleigh because of the accessibility of the sea and beaches.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Simon Griffiths

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: My

comments herein refer to the Exmo_20 development site, having regard to various consultation documents, committee meetings and earlier consultations :- 1)
Concerning vehicular access, I understand that Devon County Council have commented that they believe St. Johns Road to be unsuitable and that it is unclear whether access via the housing estate to the south would be able to accommodate additional traffic. They conclude that vehicular access can only be via the B3179. In view of DCC comments in a 2016 report on the Dinan way extension it is understood that around a third of working commuters travel to Exeter and that 80 percent of these are by car. The B3179 road is narrow in many places, without any existing footways or lighting. In the absence of any traffic or highway engineering assessment reports included in the consultation documents it is my contention as one who has been involved professionally in highway schemes that widening of the B3179 should have been evaluated before Committee Members apparently decided to over-rule officers rejection of Exmo_20 as a viable option. Any proposed development site must be deliverable in terms of infrastructure, yet in the working party meetings last summer concern was expressed that there may be a risk to EDDC in the absence of active land owner promotion. Meanwhile existing bus services are few and far between connecting Exmouth, Budleigh Salterton and Exeter. In the documentation it is recorded that an indicative Master Plan has been prepared for Exmo_20, that a 400 metre exclusion zone will separate the development from the Pebble Bed Heaths and that most of the development will concentrated in the southern part of the site. I and others are not only prevented from a full appreciation of the impact of this large, long site by the absence of the alleged site layout and by the absence of traffic / highway data, but also by the lack of a detailed infrastructure Delivery Plan. I am thus concerned that Members have decided to include Exmo_20 without proper consideration of the risks of congestion on the B3179, any apparent discussions regarding public transport provision, whether the road can be widened without requiring compulsory purchase

orders, whether provision is feasible for cyclists, and pedestrians, and for animals to safely cross the road. There is also the matter of the northern part of the site adjoining the B3179 being substantially within the Minerals Safeguarding area. Without properly considering and evaluating the viable delivery of homes on this proposed site and the risks of non-delivery due to technical or financial risks the proposal is contrary to Policy TR03. 2) Failing discuss the impact of the proposed development on Squabmoor reservoir and Bystock Ponds and the associated ground water regime is contrary to Policy PB01. For any competent developer to be able to confirm interest they will need to fully appraise and cost the site development risks. EDDC have prove proposed Exmo_20 with undue haste, seemingly because it is a large area of land. 3) I would also add that this site if fully occupied with housing will lead to a great loss of the pleasant rural vistas at the edge of edge of Exmouth as well as substantially jeopardising the as yet the natural environment. 4) Exmo_20 should have been referenced as partly a Budleigh site owing to its risk of developing a future connurbation. Not doing so may have led Budleigh residents into not responding to the consultation. Budleigh may well be heavily impacted in terms of traffic. 5) the large number of proposed houses - 700, will impact o on community facilities. Apparently schools and healthcare facilities in the area are already reportedly stretched and and this amount of houses at the edge of Exmouth / Budleigh / Woodbury needs a proper infrastructure plan to cost appropriate provision.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Charlotte De Groot

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

1. The main access point to the proposed site Exmo_20 is significantly closer to BUDLEIGH SALTERTON than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh, its High Street, doctor's, School and Beach etc, would be the preferred choice for residents of Expo_20. This would undermine the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

2. Exmo_20 would cause harm to the adjacent Pebbled Heaths (SSSI/SAC/SPA/NNR) due to the Exmo_20 location being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3. Exmo_20 would cause harm to the local heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

4. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wilderness and dark skies" of the countryside, which is contrary to POLICY OL01.

5. Exmo_20 4. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways , would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

6. Exmo_20 would be in contravention of PARAGRAPH 11.2 as the need for car travel would increase traffic congestion. The isolated location is unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far and too steep from any town centre to use walking or cycling as a mode of transport. This is contrary to POLICY TR01.

7. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolation habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

8. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is 'currently not sufficient certainty to rule out adverse effects in integrity in relation to.... air quality' (East Devon Pebblebed Heath SAC/SPA) such that the Plan fails the integrity test.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan - The current local infrastructure of Budleigh cannot support any

new residential homes. Of particular concern are the sewage works, education facilities and medical facilities.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Amanda Gulbranson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmouth is a growing town, and with the sea and river Exe as boundaries in 2 directions- this will inevitably impact on other areas where growth is considered- however it is absolutely essential that this is done with careful consideration that is sympathetic to the existing inhabitants of Exmouth and the environment which plays an important part regarding the quality of life of the town's population.

With other large scale developments still in progress, the full impact of these have still not yet been experienced- but already there is insufficient infrastructure within the town to support the needs of residents. For example; timely access to healthcare (GP appointments, dentists....noted that a recent statement from a GP in Woodbury changed their catchment area for new patients which will impact on new homes currently being built too). Whilst primary school placements I believe as still sufficient, schools within the current catchment area may not be able to cope, and the town's only secondary school is already full- with local families already being offered places in e.g. Cranbrook despite putting Exmouth as their first choice. There are already local amenities, a struggling sewage system that cant cope with existing demand which is resulting in increased pollution, and despite SWW's plans to improve this- this work will be completed over years..... Neither is the growing population served with sufficient grocery stores/ supermarkets...and despite recent announcement of another supermarket being planned- this will help to address current need, and not increased need that further development will have. Roads in and out of Exmouth are already busy and becoming busier- and whilst additional roads are being built in Exmouth- the rate limiting factor still remains with only 2 main routes from Exmouth to Exeter (which are busy and also increasingly blocked if weather causes flooding). Further development, and the time and scale of this MUST consider and protect Exmouth for current and future generations.

With some development likely to be essential, I do not consider the site proposed for Exmo-20 to be a suitable development site at this time due to a myriad of different reasons which all, in my opinion and understanding, all contravene existing local policy. The location of Exmo_20 also means that the proposed development will have a significant impact on the nearby town of Budleigh, which will be closer/ easier to access than Exmouth- and therefore have a significant impact on their local resources (healthcare, shops/ resources) too.

Further reasons I am concerned and feel that this site (Exmo_20) is currently inappropriate: Conflicts with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors (contrary to PARAGRAPH 13.23 of the Local Plan). This would cause irreplaceable harm to existing habitats, trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. I have observed and heard over 20 different species of birds in the last few months alone. These include goldfinches, bull finches, green finches, gold crest, fire crest, song thrush, mistle thrush and tawny owls, as well as buzzards, sparrow hawks and occasionally a nightjar. Mammals include deer, badgers, dormice and bats (including long-eared brown bats + other species). In addition to this, the area supports a biodiversity in insects and plants. We all live in houses that were once fields.....but it is vital that further development is carefully planned and has to support balance. This is something my son and his generation are also concerned about. At the very least, IF a development (of any scale) is considered- tree preservation orders should be blanketly applied to the existing woodland areas- this would ensure consistency in line with TPOs that have been blanketly applied regarding other planning proposals (private) that have been processed in the area- and therefore should apply equally to development whatever the scale.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) which states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebble bed Heaths SAC/SPA) such that the Plan fails the integrity test. One of the main site of access proposed for this development is opposite the SAC/SPA. As discussed above, the site of the development/ extension of the Exmouth plan for housing will adversely affect the natural environment and result in loss of diversity- within the area as well as surrounding areas. (See objective 8 paragraph 2.10). EXMO_20 is also in conflict with paragraph 13.23 as it lies within an identified strategic nature area (SNA368) and is part

of the local Nature Recovery Strategy; connecting habitats and wildlife corridors between the Pebble bed Heaths through to woodland which lies south of this.

The development site would have a significant impact/ cause potential harm to a local place of worship: St John in the Wilderness (Grade II* listed church- a heritage asset) by eroding the rural setting- which provides a tranquil, calm and peaceful setting for worship and reflection- including the surrounding churchyard. This is contrary to POLICY HE02. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Previous developments in St Johns Road (near St Johns in the Wilderness church) did indeed increase run off into the brook which had a detrimental impact on the bank and requiring some residents of Meadowview road to have to take action to strengthen the remaining bank to prevent further erosion. The run off of water that comes down st johns road after heavy rain is significant- and can cause temporary flooding in the low point of the road before going up to Dinan way. The size of the development proposed for this land- currently fields and woodland which help to delay soak away- would be significant.

Exmo_20 would increase the need for car travel, contrary to Figure 7, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The location on the outskirts of town provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. Whilst walking and cycling are potential options- this is unlikely to be a suitable option for most (and with the lack of a robust cycle path infrastructure to support this and planned development of road so that Dinan way will be busier with larger vehicles- also likely to be undesirable to cycle on and unsafe). The reality is that families often have at least one car, often 2 now, to support work and lifestyle choices.....and even if they don't drive to the shops themselves- there is increased use of on-line ordering and delivery- which will increase traffic to the development site (via unsuitable access routes which have been proposed e.g. via Meadow View and Southern Wood- which, when I have on occasion driven down these roads- which parking on both sides- essentially makes the road a single wide road for passing- so increased volume of traffic caused by new development will be detrimental and is also contrary to POLICY TR01. Also- even if people walk- foot paths (ie that cross the Dinan way near the bus stop and further up) are potentially dangerous with current level of traffic (and I am really concerned re. school children that use this walkway too – which is a proper walk way through from St Johns road down to Dinan way – crossing over to Meadow View Road- which would be a route if new development supported) . With new road link from

Exeter road to Dinan way- the increased volume of traffic (and larger vehicles) will add to this risk- and despite the speed limit being 30mph, this is not always adhered). The access to the development is limited and doesn't support a development of the size and scale proposed. There are only 2 access roads identified for this proposed site; via Southern Wood and also the B3179 near the archery club. Both access points will mean a significant increase in the traffic on residential road and the 'common' road (B3179 through Woodbury). Also- as seen recently when the Exmouth to Budleigh road was closed due to an accident (I believe) traffic was redirected (sat nav?) via St Johns road- this resulted in a lengthy queue waiting to exit the road on to Dinan way- essentially blocking the road and taking a long time to clear- therefore this is an example of what a small change could cause..... My understanding is that the site has no other points of access and is 'land locked due to other land ownership. It would seem sensible to therefore consider alternative sites (especially because of the scale proposed) at this time- and perhaps revisit this site in the future when access rights and options have changed and hopefully improved when considering the development and impact of a larger scale development.

Personally (and I know that many feel the same way) I feel strongly that an alternative site to Exmo_20 should be selected for housing as part of the revised local plan- one that is available, achievable & suitable within the HELAA. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. Exmo_20 would also cause harm to the adjacent Pebble bed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being an adjacent and supporting foraging habitat.

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.: Given the points raised above , I feel strongly that at the current time, EXMO_20 should be removed from the current plan, and that access for the scale of the proposed development is NOT

appropriate from the limited access points (B3179 and Southern Wood) proposed. In the future, where landownership may change and access to proposed site may change it may be appropriate to reconsider- BUT - equally , because of the other points raised which contravene local policy, the scale of the proposed site needss to be smaller.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christine Hadley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The EXMO 20 development is adjacent to the National Landscape and the Pebblebed Heaths (SAC/SPA) and will or is more than likely to have a detrimental effect on these valuable national assets. The proposed development is contrary to policy PB01. It would increase light pollution dramatically and the additional noise will affect the peace and tranquility of area. This will have a detrimental affect on wildlife, trees and hedgerows. There would be an increased to the risk of flooding to the lower lying land in conflict with Policy ARO1B The increased car use will result in congestion getting to the town centre, on the nearby minor roads and the B3176. The infrastructure for sewage disposal is already overwhelmed and is not coping. This problem needs to be redressed before any plan for 700 new homes can be considered in any part of Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christine Hadley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The EXMO 20 development is adjacent to the National Landscape and the Peblebed Heaths (SAC/SPA) and will or is likely to have a detrimental effect on these valuable national assets. The proposed development is contrary to policy PB01. It would create a dramatic increase in light pollution and noise affecting the peace and tranquility of the nearby wildlife and be detrimental to trees and hedgerows. There would be an increased flood risk on the lower lying land in conflict with Policy ARO1B There would be increased car use and resulting congestion getting to the town centre. The infrastructure for sewage disposal is already overwhelmed and not coping. This needs to be redressed before a plan for 700 new homes can be considered in any part of Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: paul haestier

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: the access point is closer to budleigh than exmouth. this will cause extra strain on the budleigh services, which are struggling to cope now. additionally, the extra strain on the overloaded sewage system, that cannot cope with then infrastructure as it is. Yet more polluted beaches. the additional traffic this will bring to the B3179, will cause more pollution, and cause chaos on that road. not to mention the environmental devastation to the pebblebed heath.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: THIS IS A RIDICULOUS PLAN THAT SHOULD NEVER HAVE BEEN CONSIDERED

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sarah Hales

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 in Exmouth (and other developments) will be in conflict with Paragraph 11.2 as it will definitely increase the need for car travel and cause increased traffic congestion both around Exmouth and Budleigh and through the villages along the insufficient road network to and from Exeter. Most of the people in these 700+ new homes will work outside Exmouth, as it will not provide sufficient job opportunities, and Exeter will be their main destination. Exmouth train station will be nearly 4 miles away from Exmo_20 so not at all accessible and the cycle track similar distance away after cycling up and down a steep hillside. Thus is contrary to POLICY TR01.

A recent email to our MP David Reed regarding the poor road network between Exmouth and Exeter and beyond got this reply Thank you for your email about the likelihood on increased traffic movements through Woodbury and surrounding villages.

I asked Cllr Richard Scott (Devon County Council with portfolio responsibility for Highways) for his views and he responded as follows:

There are no plans for any major infrastructure improvements after the Dinan Link. The current local plan does not provide for any nor does the proposed new local plan for housing. EDDC took the decision to separate its new proposed local plan, first dealing with housing and infrastructure after, our view is this is a huge error.

It will be a 'huge error' to continue to develop Exmouth without considering the road access. Exmouth is on a peninsular with very limited roads, where as many other East

Devon towns have dual carriageways nearby and a much more developed transport system.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Councils cannot consider increasing housing without assessing the wider infrastructure especially around road access and congestion concerns to and from each development.

Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: LesleyAnne Hall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available , achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths. (SSS1/SAC/SPA/NNR) due to to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the site Selection Methodology & POLICY PB01 of the local plan & not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. The proposed development is in conflict with POLICY OL09 & POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to “air quality “ (ED Pebblebed Heaths SAC/SPA) such that the plan fails the integrity test. The main site access proposed is opposite the SAC/SPA. Development of Exmo_20 on heavy clay subsoil with ineffective soak ways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to figure7 - the energy hierarchy & increase traffic congestion , in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services & facilities , contrary to PARAGRAPH 11.6 . It is too far & too steep from any town centre to use walking or cycling as their choice of transport . This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Access via Southern Wood on to Meadow View Road would be absolutely inappropriate. Meadow Biew Toad

is already fairly congested with cars parked on the road & an increase in traffic from the proposed development would cause mayhem along this road , specifically at commuting times & especially when trying to access Dinan Way. It would be an “accident waiting to happen”

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Susan Hall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Exmo_20 proposed development will cause harm to the Pebblebed Heaths (SAC/SPA). It will be contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Developing Exmo_20 would isolate habitats and destroy wildlife corridors, contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to Paragraph 13.9 of the Local Plan.

The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to....air quality (East Devon Pebblebed Heaths SCA/SPA). Exmo_20 is in conflict with Policy OL09 and Policy PB04.

Exmo_20 would destroy the tranquillity, wildness and dark skies of the countryside, which is contrary to Policy OL01.

Exmo_20 would adversely affect St John in the Wilderness Grade 11* listed church and churchyard, drastically altering its current peaceful setting. This is contrary to Policy HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would increase the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with Policy AR01B.

Exmo_20 would vastly increase the need for car travel and would therefore increase traffic congestion, in conflict with Paragraph 11.2. It is therefore unsustainable development. Its isolation would necessitate people travelling much further than 800m to access existing key services and facilities, contrary to Paragraph 11.6. It is too far from any town centre for people to use walking or cycling as their choice of transport, especially in view of the steep gradients and lack of pedestrian footpaths which would make this difficult and hazardous. This is contrary to Policy TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (shops, doctors, school, beach etc) would be the obvious choice for residents of Exmo_20. This would result in coalescence of Budleigh and Exmouth, contrary to Policy OL05 of the Local Plan.

The views from the SW Coastpath and the approach to Exmouth and Budleigh via the B3179 would be seriously impacted, both for residents and a large number of visitors, and would further erode claims that this area is an AONB.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan. There is no way this can be described as a 'development' of either Exmouth or Budleigh Salterton, as it is too far removed from both.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Kerin Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ExMO_ 20 would have a dire effect on nearby wildlife sites and destroy the wildness, dark skies and tranquility of the countryside contrary to POLICY OL01. The proposed development is in conflict with the Strategic Nature area 368. It will fragment and isolate wildlife corridors contrary to Paragraph 13.23 of the local plan. This development will cause harm to irreplaceable habitats, veteran trees with TPO's and species rich hedgerows. This proposed development would be built on a very heavy subsoil and the rainwater run off would meet the Withycombe Brook through Exmouth which would cause excessive flooding. Removal of the trees at the bottom would prevent water being absorbed. This is in conflict with POLICY AR01B.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To have a voice of reason.

Full name: Kerin Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed site is extraordinarily beautiful. It is countryside that should not be lost forever and turned into urban sprawl. This will increase the need for more traffic on the B3179, which is quite a busy route. Getting out from Dalditch Lane is dangerous, but add thousands more cars and it would be impossible. The fumes from extra cars (which the government wishes to reduce) will be considerably worse and will have an unhealthy affect on residents, wildlife and the Pebblebed Heaths. This can never be mitigated! This is in conflict with Paragraph 11.6. It is too far and too steep from any town centre to use walking or cycling as a choice of transport. Nor is it safe to do either on the B3179. this is contrary to POLICY TR01.

Full name: Kerin Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 should be found, one which was deemed available , achievable and suitable in the HELAA. EXMO_20 will cause damage to the nearby Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to EXMO 20 currently being a supporting foraging habitat. Developing EXMO 20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. The plan would cause damage to a Grade 11 heritage asset being St John in the WILDERNESS. There is a beautiful, peaceful setting for this church and burial ground which would be drastically altered with hundreds of houses around it. This is contrary to POLICY HE02.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because EDDC has not listened to all the points raised

Full name: Kerin Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: the main entrance and exit is closer to Budleigh than Exmouth and this will bring more people into Budleigh which already has its own building projects proposed. The town will lose its character and the small infrastructure which exists will be over run. It is already extremely difficult to get a doctor's appointment and this problem will be exacerbated by the addition of another 4000 people. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove EXMO _ 20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because EDDC has not listened to the many objections, nor have they consulted from the outset, therefore, speaking to the Inspector is crucial.

Full name: Anne Hand

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Not enough consideration has been given to (a) infrastructure needed to support this development (b) the dangers of having large amounts of traffic joining the already dangerous B3179 (c) the impact on users of the surrounding common land, walkers, horse riders etc (d) the real danger to the rural character of East Devon whereby the suburbs of Exmouth gobble up small towns and villages in hideous urban sprawl.

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.: Don't build here!

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This development plan is being rushed through and not advertised to those who have legitimate concerns both from safety and aesthetic perspectives.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The major development site proposed has been identified by EDDC Committees on which Budleigh Salterton has no representation. This has resulted in a lack of awareness in Budleigh of the potential impacts on the town which EDDC should have made the Parish Council aware as part of its duty according to Local Plan procedures. Moreover, the main site EXMO_20, which was originally rejected under HELAA, appears to have been resurrected following lobbying by Councillors who might be open to a potential breach of the Nolan Principles, as might the Officers. The proposal that the main access to the site should be directly onto the B3180 would inevitably funnel more traffic into Budleigh, Just under 2 miles away, rather than Exmouth, approx 4miles away. Budleigh simply does not have sufficient capacity in its local services (e.g. No secondary school and a limited primary school). The B3180 is in essence a minor country road, devoid of footpath, with very dangerous bends at Inner Ting Tong and bordering the highly sensitive Pebble Bed Heath. Cycle at your peril, if you can manage the gradients. The proposal would result in a community the size of Woodbury which is the antithesis of what the Foreward describes :- "...From the rugged beauty of our Jurassic Coast to the peace and tranquility of our National Landscapes, we are surrounded by a glorious, thriving natural environment; between the quiet vitality of our towns and the gentle warmth of our historic villages, we share a proud and welcoming community..." This proposal is little short of environmental vandalism. The proposed new town East of Exeter should provide the bulk of development, supplemented by more modest and limited expansion of sites that simply feed masses of additional traffic onto already inadequate roads such as the B3180 and the South exit from EXMO_20.

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.: Abandon EXMO_20 and land to the South the Fire Station and MacDonalds

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This site was excluded from Devon County Council's original listing of available and suitable sites in Exmouth so its inclusion and the lack of notification to the neighbouring Budleigh Salterton Town Council constitute breaches of EDDC's statutory obligations. Additionally, the proposal breaches a raft of existing policies such as HE02, OL01, OL09, PB04 etc.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This policy sets out the procedure to be adopted for plan making as set out in PCPA2004 Section 33A. Failure to follow this meant that the site was not listed by Devon County Council as a preferred or Second choice as it was considered unsuitable and unachievable. The result has been a stifling of local democratic participation

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: At the stage in the planning process when potential sites were being identified (HELAA stage20, EXMO20 was considered as being unsuitable and unachievable. For this reason it was not included in Devon County Council's Regulation 18 consultations as either a preferred or second choice site. Thus it would appear to have "flown under the Radar" , only belatedly coming to the attention of Budleigh Town Council and local residents

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.: Refuse EXMO20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The site is 4 miles away from Exmouth, the main centre it purports to serve . Since the topography of Exmouth is more akin to a peninsula wedged between estuary and sea proposed development is shunted onto more rural and inappropriate locations with inferior transport links and inadequate local services which are not within reasonable walking or safe cycling distance. Residents without cars would face social exclusion.

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.: Refuse EXMO20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy OL01 is designed to prevent any harm to locations perceived to have aesthetic and perceptual factors associated with tranquility in a truly wild setting. "Dark skies" are also specifically mentioned. All of this would be sacrificed, particularly at night, due to the massive increase in housing and associated vehicle movements, especially at night with headlights lighting up the adjacent Pebblebed Heath margins.

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.: Refuse EXMO20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Local Nature Recovery Strategy locates the site within Area SNA368 which has a key role in combining wildlife sites, extending them and thus producing connecting wildlife sites. Development within them would destroy or at best disrupt feeding and foraging sites, completely at odds with the SPA's conservation objectives.

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.: Refuse EXMO20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This policy rightly seeks to protect the natural environment and increase the biodiversity of site such as the Pebblebed Heath. Exmo20 will instead undermine it.

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.: Refuse EXMO 20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: As the site sits along the B3179 all traffic exiting from it will pass along the boundary of the protected Pebblebed Heath (SAC/SPA) thus adversely impacting on air quality.

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.: Refuse EXMO20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy PB01 states that proposed development that might have an adverse impact on designated sites will not be permitted. due to its proximity to our Pebbled Heaths which have SAC and SPA rating EXMO 20 should be refused.

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.: Refuse EXMO 20 entirely

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: EXMO 20 falls foul of Policy OLO5 as it is located much nearer to the middle of Budleigh Salterton than it is to the middle of Exmouth so that the principal road from it will direct traffic into the narrow confines of Budleigh's High Street. This will increase the coalescence between the two towns which is already apparent along the Exmouth Road and its Southern margins. Budleigh's essential services will not be capable of coping with the increased population's reliance on everyday services such as schooling, medical care and the leisure outlet of Budleigh's beach. Exmouth 20's main infrastructure will, on the other hand, be linked into that of Exmouth's, partly through topography. This will overload some systems such as sewage and power which will themselves require significant upgrades.

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.: Exmouth 20 should be excluded from the Local Plan.

Full name: Patrick Harland

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the 'Tranquility, wildness and dark skies' of the countryside, which is contrary to policy OL01

The main access point of exmo-20 is significantly closer to Budleigh Salterton than Exmouth making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (doctors, school etc) would be the obvious choice for residents of exmo_20. This would lead to coalescence of Budleigh and Exmouth, is contrary to policy OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paula Harris

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with paragraph 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

Full name: Sue Harrison

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The principal access point to Exmo_20 is much closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient and accessible town. The services and infrastructure of Budleigh including shops, parking, doctors, school, beach, library etc would become first choice for the new Exmo_20 residents. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to Policy OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected; one which was deemed available, achievable and suitable in the HELAA.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement contrary to POLICY HE02.

EXMO_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion in conflict with paragraph 11.6. the isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities contrary to Paragraph 11.6. It is too far from any town centre to walk or cycle. This is contrary to Policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Nichola Harry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should be located at an alternative site where it would cause less, or no harm to the Pebblebed Heaths (SAC?SPA). Development of Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy wild-life of the countryside and have a negative effect on the dark skies, which are so important for certain creatures, this being contrary to Policy OL01.

Developing Exmo_20 would isolate habitats and destroy wildlife corridors, contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, established and veteran trees and species rich hedgerows across the site, contrary to Paragraph 13.9.

The Habitats Regulations assessment (30.01.2023) confirms that "there is currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC?SPA). Exmo_20 is in conflict with Policy OL09 and Policy PB04.

Exmo_20 would certainly have adverse effects on St John's in the Wilderness Grade II listed church and churchyard, drastically altering the current peaceful setting for worship. This is contrary to Policy HE02.

Exmo-20 would undoubtedly exacerbate the risk of flooding to through lower lying land at the bottom of the site and through Withycombe. It is upstream of Exmouth on the main rainwater catchment area of Withycombe. It would be on a subsoil of clay making soakaways ineffective. In conflict with Policy AR01B.

Exmo_20 would significantly increase traffic congestion in conflict with Paragraph 11.2. People would need to travel to existing services and facilities, contrary to Paragraph 11.6. It is too far for most people to walk, leaving travel by car as the only choice of transport. This is contrary to Policy TR01.

Budleigh Salterton is the nearest accessible town but the services and infrastructure would struggle. Exmouth and Budleigh Salterton would then coalesce, contrary to Policy OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access site via the B3179

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Karen Harter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

I am living with the appalling development know as Goodmores, it's a disgrace that all these developments are going ahead when the infrastructure isn't in place. Roads are appalling, the access to Exmouth will not be resolved with 2 new roundabouts, the pollution and damage to our green spaces and no investment in the actual town centre which is starting to represent a depressing, grey empty area.

Full name: Andrew Hatfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the

Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to

POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways

ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY

AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is

isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from

any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to

Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor’s, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo_20 from local plan Exmouth can not cope with size of the population in the local area and the facilities, this will only increase pressure on the town in so many areas.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: i care about my local area, and what this brings to the future for the next generation including my own children, with over-crowding Exmouth and spoiling this lovely town.

Full name: Mary & Terry Hayman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise.

If this development has to go ahead then we will also need to have a plan in place that gives Exmouth residents preferable treatment to buy the houses, especially the affordable ones so that our youngsters have first choice.

The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

The main Budleigh road is already very busy and of course, if this new estate goes ahead a lot of extra traffic will be added.

Exmouth already has a Sewage problem and the question is , will extra housing and residents make the problem worse? If so, tourists will be put off coming to our seaside town in future.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Please keep our beautiful countryside on the outskirts of the town and make full use of vacant buildings in the town area, such as the police station and magistrates court.

Full name: wes healey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh salterton than to Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, school, beach etc)will be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan

EXMo 20 would increase the need for car travel and increase traffic congestion, in conflict with Para. 11.2. The isolated location is unsustainable development as people will need to travel much further than 800m to existing key services and facilities, contrary to Para 11.6. It is too far and too steep for walking or cycling, contrary to Pol TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXmo 20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Cathryn Heggadon

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
EXMO_20 is nearer to Budleigh than Exmouth. Services and infrastructure in Budleigh is not equipped to deal with the influx. It is contrary to Policy OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sarah Hemingway

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposal at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebbled Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy,

Exmo_20 would destroy the "tranquillity, wilderness and dark skies" of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, and veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulation Assessment (30.1.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to....air quality (East Devon Pebbled Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmou_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmou_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmou_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from local plan or reduce its size

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jeffrey Steven Higgins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: *

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

* The Habitats Regulations assessment (30.01.25) confirms that there is?"currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

" Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than

Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. For Q3c you can either leave it blank or put in a suggestion (examples below which you might want to use)? Remove Exmo_20 from the Local Plan * Reduce the size of Exmo_20 * Do not access the site via the B3179 * Do not access the site via Southern Wood * Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Ockleford Hiley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Budleigh is a small town with limited access to infrastructure including doctors, parking, schools and beach access. If EXMO_20 is introduced its nearness to Budleigh would encourage much higher use of Budleigh as it is nearer than Exmouth. This undermines the settlement hierarchy and would be contrary to POLICY OLO5 of the local plan. Exmo_20 is in conflict with POLICY OLO9 and if instigated would have a detrimental effect on our present community in Budleigh where many elderly and frail people live at present. The substantial increase in traffic would be detrimental to the town which is already jammed in the summer months and parking would become a nightmare. There are many reasons for refusing this development to go ahead, both legal and social. The council has a responsibility to protect the residents of its area and this development would be detrimental and life changing for both the beautiful area of Budleigh and its many residents.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan and find an alternative site.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Margaret Hiley-Payne

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Gazelle Hill

Other party name (if relevant): Mark Glanville

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan, ? Reduce the size of Exmo_20, ? Do not access the site via the B3179, ? Do not access the site via Southern Wood, ? Revert to Exmo _20b as previously proposed,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jason Hill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

- Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

- The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

- Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

- The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo 20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Richard Hillman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the tranquility, wildness and dark skies of the countryside which is contrary to POLICY OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 The Habitat Regulations assessment (13.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects on St John in the Wilderness Grade 2 listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a sub soil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would have to travel much further than 800m to existing key services and facilities contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OLO5 of the local Plan. IN CONCLUSION, ITS IMPORTANT TO REMEMBER THAT ONCE IT IS GONE, IT IS GONE FOREVER.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Terence Hitchins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Annette Hooker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the

Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to

POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways

ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY

AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is

isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from

any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to

Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: George Hooper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and is not on accordance with the mitigation strategy. Exmo_20 would destroy the "tranquility, wildness and dark skies" of the countryside, with is contrary to POLICY OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to .. air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. Exmo-20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11 2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice if transport. This is contrary to POLICY TR01. The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The servant infrastructure if Budleigh (High Street, Doctors, school, beach etc) would be the obvious choice for residents if Exmo_2. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local plan - or reduce the size if Exmo_20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Annette Hooper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development of Exmo-20 is contrary to policy PB01 of the local plan. Harm to the Pebblebed Heaths is likely because of the scale of the proposed development, and not in accordance with the mitigation strategy. It is contrary to policy OL01 as Exmo-20 would destroy the "tranquility, wildness and dark skies" of the protected countryside area.

Contrary to paragraphs 13.23 and 13.9 EXmo-20 would destroy wildlife corridors, irreplaceable veteran trees and hedgerows across the site.

EXmo-20 will increase car travel, traffic congestion-conflicting with Paragraph 11.2. Terrain and distance will deter walking and cycling in preference for the car contrary to policy TR01.

Road access to Budleigh Salterton from EXMO-20 will be easier than to Exmouth. Coalescence of Exmouth and Budleigh Salterton is contrary to Policy OL05 of the local plan

Conflict with POLICY AR01B is of great concern increasing flood risks through the lower land at the bottom of the site and down through Withycombe.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of EXMO-20 No access to B3179 or Southern Wood

Full name: Ewa Howard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making the new residents of Exmo_20 use Budleigh with its services and infrastructure rather than Exmouth as it would be more convenient for them. This would contravene Policy OL05 of the Local Plan as it would lead to merging of Budleigh Salterton and Exmouth. Exmo_20 would also cause harm to the adjacent Pebblebed Heath and to various heritage assets.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Audrey Howell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The services and infrastructure of Budleigh in particular are not sufficient to accommodate this type of development as residents of the proposed Exmouth 20 would possibly wish to use the Doctors and School. It would totally undermine its individuality. Budleigh already has problems with Surgery appointments for existing residents and parking will become an issue as there will be no bus service near this development. It is all totally contrary to the Policies of the Local plan. OLOS. PB01. HE02. There will e the possibility of flooding

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmouth 20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: In policy OL01 it is stated that development 'will only be permitted where it would not harm the aesthetic and perceptual factors such as tranquility, wilderness and dark skies' - why then is a 700 home development right on top of a hill and not in either Exmouth or Budleigh - ie in a totally separate, isolated site -adjacent on one side to one of the most treasured and important conservation heathland sites not only in England but in Europe - and on the other side to an ancient 'St Johns in the WILDRENESS' church and surrounds - - even considered?. Surely at the most basic level anyone can see the potential aesthetic, light , sound and traffic pollution that this would cause. It makes one wonder whether the proposers of the site actually have visited it or know where it is let alone considered it in relation to actual policies in the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Take out Exmou20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmou_20 is in total contravention of paragraph 2.10 - to protect and enhance our outstanding natural environment and support and increase in biodiversity. On this policy paragraph alone it is unbelievable that this site has been considered for such vast development. Right on the edge of Woodbury Common's pebbled heaths which are internationally designated Sac site - home to many rare species - specifically the Dartford warbler and nightjar and an important SSSI. The light, sound and air pollution from such a development would completely destroy the Heaths and all they stand for. Many local extensions and small building projects have been rejected by planners due to their proximity to the heaths and the detrimental effect they would have (& the presence of cats) and yet this site is closer to the Heaths than any of those sites that have been refused due to proximity to the Heaths. This site is vast and the pollution it would produce is immense. I believe that Exmou20 could be located on alternative sites which would not cause harm to the pebbled heaths and so is in contravention of policy PB01. The Habitat Rgs assessment (policy OLO09 states that permission will not be granted for development which would result in pollution that cannot adequately be mitigated - the sound, light and traffic air pollution of 700 houses with thousands of cars being churned out meters away from the pebbled heaths cannot be mitigated so close to such a sensitive site which relies on quiet, dark and clean air. The habitats regulations assessment PB04 state there is currently not sufficient certainty to run out adverse effects in integrity in relation to & air quality. This site will affect the integrity of a site protected under the Conservation of Habitats and Species regulations 2017 which includes SAC sites. It will also result in the loss of biodiversity and certainly won't encourage biodiversity - para 2.10 in the policy. The area also lies within a Strategic nature Area (SNA 368). Rather than 'enhancing biodiversity and increasing habitat areas

and connecting isolated habitats' as stated in the policy - this development will only serve to further fragment a currently very fragile habitat and reduce existing habitat (and productive agricultural land).

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.: Take out Exmou 20 from local plan

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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(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.: TAKE OUT / RECONSIDER EXMOU20

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: REF EXMOU 20 - Para 3.34 - directing growth to tier 1-4 settlements - development should be concentrated in areas with existing infrastructure. The nature of the position of this site means that Exmou20 residents would try and use Budleigh services - these are already overstretched without 700 - 1000 more residents. The local school has recently publicised their desperation at the fact that they are so overrun - more children will not help this situation .

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.: Take out Exmou20 - it is in a totally unsuitable place for existing services and infrastructure.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please

be as precise as possible.: This will affect Budleigh services and residents - hardly any Budleigh residents or the town council knew of this proposal

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: comments in previous submission

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.: take out Exmouth 20

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Conflict with policy HE02 - the site includes a Grade II listed Church - St Johns in the wilderness - surrounding this site with mass development will not be sympathetic to this listed building and its surroundings. Conflict with policy OL05 - this proposal potentially leads to settlement coalescence - site is nearer Budleigh than Exmouth - residents of this site would use Budleigh facilities such as doctor surgeries which would not cope with the amount of people In conflict with paragraph 3.3 - Boundary extended to include land housing will be built on but also 400 m buffer zone by including it in settlement boundary - councillors have suggested that this area can be used for commercial sue - - this would cause severe detriment to the pebblebed heaths and surrounds

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.: Take out Exmou 20 - it is not viable

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Residents not consulted

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.: previously stated in other submissions

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmou 20 is totally in conflict with policy AR01 (B). Area sits on top of a hill on clay soil - draining towards Withycombe Brook area which is already highly populated and in great danger of flood risk. It would be madness to build on a site which would drain so quickly and dangerously into this area and potentially cause mass flooding.

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.: take out Exmou 20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: no local or residents opinion sought at any of the stages - policy SD01 PCPA 2004 - section 33A

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: to ensure correct regulations are followed

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: not in line with the PCPA 2004 - initial stages deemed it not suitable or achievable and HELAA stage 2. Site was totally omitted from reg 18 consultations due to not being a preferred or 2nd choice site. Site very quickly went to allocated without public opinion or representation being allowed (from anywhere in the local vicinity) - Term Exmou is very misleading as site is nearer Budleigh and should be allowed to be considered for where it is situated,.

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.: Take Exmou20 out of Local plan

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: For reasons stated in 2 B - No public consultation. Maps online appeared to allocate it in red as not a site for consideration - after decisions had been made the map did not change so public were unaware that it was a site for consideration. Once public realised it was being considered many of the avenues for objection were already closed. This process was not in accordance with NPPF chapter 3. It was not preferred or 2nd choice and was not considered in regulation 18 consultations. The speed at which the site was 'allocated' and the lack of time consideration or consultation with relevant bodies such as natural England, the county council on road infrastructure etc was appalling. Local residents, the local community in general were not consulted. Local councillors did not

seem aware of the site. As such local consideration and representation has not been able to be presented at the correct stage of the process

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.: Take Exmou 20 out of the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

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.: Not in accordance with PCPA 2004 - section 33A. No consultation with Devon County Council

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure local residents and other official bodies views are represented

Full name: Ian Howick BSc Eng C Eng FICE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: details in previous submission

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.: details in previous submission

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmou20 is in conflict with policies SP01, TR01, TR03 and paragraph 11.2, 11.6, 3.34 & 2.6 of the Local plan. Exmou20 is in conflict with policy SD01 - the area considered for development is completely detached from all the town centre services of Exmouth and therefore cannot be considered as a development in Exmouth. Existing development is already developed a long distance from the town centre and any new development will be a long distance from the town and is therefore unsustainable. If people are housed in this area they will be drawn to other villages or more travel by car to get to the facilities they need. Allocation of Exmou20 is in conflict with paragraph 11.6 - most of the site is not within 10 minutes walk of any key services or facilities. To provide those services for this area alone wouldn't be economically viable and will of necessity force people to drive over 2-3 miles over unsuitable roads to access the services they need. Allocation of exmou20 is in conflict with policy TR01. It is fatuous to suggest that people going shopping or to work or the school run will walk or cycle. Unless a complete re-education of the human race is planned they will not walk more than half a mile without resorting to the use of cars. The provision of walking routes,

cycle paths and public transport will be totally uneconomic and unviable and it should be noted that none of the roads including the B3179 has a single foot path on any side of the road on any part of its length and there are no cycleways. Similarly the road from Budleigh Salterton to Littleham has not a single footpath or cycleway on any side of the road from the outskirts of Budleigh Salterton to Littleham. None of the rural roads - St Johns road, Dalditch Lane, Inner Ting Tong and castle lane have any footways at all and are highly dangerous already without any increased traffic flow. Exmouth and Budleigh Salterton schools are already oversubscribed and overcrowded for many of the academic years. without massive investment to provide more schools and recreational facilities it would be irresponsible to condemn future populations of the area to such poor facilities. Will this type of development support the investment needed to provide the educational, recreational , widening and providing footpaths on all essential roads, provision of doctors surgeries, adequate pharmacies, provision of adequate sewerage treatment facilities and sewerage system upgrades to take the flows which are already in excess of their capacity. Development without this investment would be irresponsible in the extreme

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 Exmou 20 from Local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: comments in previous submission

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.: comments in previous submission

Full name: Ian Howick BSc Eng C Eng FICE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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.: comments in previous submission

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.: comments in previous submission

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Emou20 is in conflict with PB01 and appears to have been given little or no time in consideration. It is not in accordance with the mitigation strategy and other sites should be reconsidered which will cause less or no harm to the pebbled heaths SAC/SPA. Allocation of Exmou20 is in conflict with policy no SAC/SPA - development involving increased use of the B3179 will create greater air pollution without any mitigation.

Allocation of EXmou20 is in conflict with paragraph 210 objective 8 - it will adversely affect the natural environment and impair biodiversity. It is also in conflict with para 13.23 as it lies within the strategic nature area (SNA368) as part of the local recovery strategy to combine wildlife sites. Allocation of Exmou20 is in conflict with para 13.9 as it would be difficult to restore irreplaceable habitat affected . Irreplaceable mature trees will disappear (and developers have already embarked on felling trees in this area which should be noted by planners) Ancient hedgerows will also be affected and are irreplaceable. The site lies within a Strategic Nature area (SNA368).

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 Exmou20 from the local plan - it has been correctly thought out or considered

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: details in previous submission

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.: details in previous submission

Full name: Ian Howick BSc Eng C Eng FICE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: submitted in previous response

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.: submitted in previous response

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Emou20 is in conflict with PB01 and appears to have been given little or no time in consideration. It is not in accordance with the mitigation strategy and other sites should be reconsidered which will cause less or no harm to the pebbled heaths SAC/SPA. Allocation of Exmou20 is in conflict with policy no SAC/SPA - development involving increased use of the B3179 will create greater air pollution without any mitigation. Allocation of EXmou20 is in conflict with paragraph 210 objective 8 - it will adversely affect the natural environment and impair biodiversity. It is also in conflict with para 13.23 as it lies within the strategic nature area (SNA368) as part of the local recovery strategy to combine wildlife sites. Allocation of Exmou20 is in conflict with para 13.9 as it would be difficult to restore irreplaceable habitat affected. Irreplaceable mature trees will disappear (and developers have already embarked on felling trees in this area which should be noted by planners) Ancient hedgerows will also be affected and are irreplaceable. The site lies within a Strategic Nature area (SNA368).

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 Exmou20 from the local plan - it has been correctly thought out or considered

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.: comments in previous submission

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.: comments in previous submission

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.: comments in previous submission

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Ref Exmou 20 - These proposals have not been made in accordance with PCPA 2004. Exmou20 was never preferred or considered as a second choice under the HELLA stage two considerations. None of us knew that the site had changed status as it had been dismissed previously. However on 3rd September 2024 the site suddenly became 'allocated' and no further opportunity was given to members of the public or the strategic planning committee to raise any comment or objection. This was despite the assessment not being complete.

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.: In view of the fact that it has not been correctly assessed or presented to the public Exmou20 should be removed from the local plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmou20 is in conflict with policy AR01(B)- stating that development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere. The allocation of Exmou20 is in conflict with policy AR01(B)- stating that development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere.

The development of 85 hectares of land draining directly to the existing Withycombe Brook will create the potential for very severe flooding of the Withycombe area and the lower areas of Exmouth including the Colonies and Exeter Road. With a steep catchment such as Exmou20 it will be virtually impossible to design retention systems economically on impervious red marl substrata. There were severe floods in 1960 where over 700 houses were damaged with two thirds of Exmouth under water. This was caused by rainfall within the same catchment and the vast area of development which had taken place in Exmouth prior to that date. Consulting engineers to the Council in 1939 recommended that the Withycombe Brook needed serious improvement to avoid serious flooding to the lower parts of Exmouth. However very little was carried out and in 1960 catastrophic flooding occurred. The Consulting Engineers at that time and the Hydraulics Research Station carried out a study and produced a paper showing that the storm that caused the flooding was not of a particularly high return period - only that estimated for once in approximately 2.5 years. Planning advisors should now be well aware that rainfall intensities experienced now over 60 years later are far greater and design recommendations are to allow for rainfall intensities of a once in 100 year storm with upgrades on this for global warming and urban spread. The 1960 population of Exmouth was around 18,500 and development since that time has increased that population to more than double with most of the development draining from the newly developed areas into the Withycombe Brook catchment. Until recently these developments were built without the benefit of mitigation systems (SUDS) and only recently have these started to be employed. Development within this catchment therefore starts with vast areas of development already draining to the Withycombe Brook without any mitigation or restraint in times of heavy rainfall. The improvement works to the Withycombe Brook which were carried out in 1961 - 62 dealt with the situation as it was at that time but it did not allow for a doubling of development draining to it , as has happened and if this development is allowed is most likely to completely inundate the system. In consequence it would be an act of total irresponsibility to add further areas of development to this vulnerable catchment area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Take out Exmou 20 completely from the local plan - it is not viable and it is totally irresponsible to subject the populations of Exmouth living in low lying areas to the potential of serious flooding. Such a scheme will potentially render them homeless and with property impossible to insure

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: We have not been given the opportunity to examine this plan prior to its sudden and mysterious acceptance. My family home and property lies within 400m of the proposed site. I have never been contacted or consulted by proposers of the scheme, any Councillor or the local Authority about it. I find this totally unacceptable.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is important to make authorities understand the potential disastrous consequences of adopting the Exmou20 scheme

Full name: Ian Howick BSc Eng C Eng FICE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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

Full name: Dave Hubbard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Chris Hughes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is too far out of the built up area and therefore not sustainable. No schools, GPs, shops, or places of work and will not enhance the town of Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Alan Hughes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There is no reference I can see (I may have missed it elsewhere in the voluminous pages of the plan) about traffic apart from access. Elm Lane is a narrow close and to use it to access the land to the west the houses would require the demolition of at least one of the dwellings. Additionally the exit from Elm Lane is close to the hairpin bend and bridge that get very busy when Sandy Bay is open. Parlour Meadow already has access to Pankhurst Close and access to a through route at a roundabout with good visibility.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Access to be via Parlour Meadow not Elm Lane

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mr & Mrs P Hull

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

We believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with Paragraph 11.6. Paragraph 11.6 states 'Studies suggest that most people prefer to walk if their destination is within 1.6 km (1 mile), typically 800m (0.5 miles). Factors such as topography, surveillance, directness, and attractiveness also influence walking choices. While it is unrealistic to require all new developments in rural East Devon to be within 800m of key services and facilities, this is feasible in larger settlements and developments.'

This is ambiguous, not justified and not consistent with National Policy.

The paragraph should omit 'prefer', as 1.6km, is stated as a limiting value and for total 'there & back distance' in referenced documents.

The policy should reflect the wording of the referenced documents and give consideration to the Sustran - Walkable Neighbourhoods publication (attached).

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.: Reword Paragraph

11.6 to ensure housing allocations are assessed using the 800m distance to services and facilities.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that the 800m (1.6km 'there & back') figure is used to determine site allocations.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with Paragraph 11.6 which states ‘Studies suggest that most people prefer to walk if their destination is within 1.6 km (1 mile), typically 800m (0.5 miles). Factors such as topography, surveillance, directness, and attractiveness also influence walking choices. While it is unrealistic to require all new developments in rural East Devon to be within 800m of key services and facilities, this is feasible in larger settlements and developments.’ The referenced documents do not state people ‘prefer’ to walk if their destination is within 1.6 km, the documents refer predominantly to 800m being deemed walkable and that the trip (there and back) distance is 1.6km. The referenced CIHT planning for walking states ‘Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes’ walking distance (around 800 metres).’ This is further supported by the ‘Sustran, Walkable Neighbourhoods’ publication (attached). Much of the Exmo_20 site is beyond 800m from existing services and facilities. Attached is a map demonstrating this by showing 800m radiuses from existing primary schools, taking no account for actual non ‘as the crow flies’ distances and the significant local topography. Therefore, unless significant services and facilities are part of the Exmo_20 masterplan and delivered, much of Exmo_20 is in an unsustainable location therefore unjustified and not consistent with National Policy, so not sound. This is even more significant for Exmo_20, as if the future residents rely on car use for accessing services and facilities, the main access point is via the country road, requiring driving over 2 miles to get back the outskirts of Exmouth, further compounding its unsustainability. It is appropriate that this site was deemed ‘not suitable and not achievable’ in HELAA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Other sites, which did pass HELAA and were shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting, should be selected for allocation as an alternative to Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that the 800m (1.6km 'there & back') figure is used to determine site allocations for larger settlements and developments.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 would be in conflict with Paragraph 11.6 which states 'Studies suggest that most people prefer to walk if their destination is within 1.6 km (1 mile), typically 800m (0.5 miles). Factors such as topography, surveillance, directness, and attractiveness also influence walking choices. While it is unrealistic to require all new developments in rural East Devon to be within 800m of key services and facilities, this is feasible in larger settlements and developments.' The referenced documents do not state people 'prefer' to walk if their destination is within 1.6 km, the documents refer predominantly to 800m being deemed walkable and that the trip (there and back) distance is 1.6km. The referenced CIHT planning for walking states 'Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800 metres).' This is further supported by the 'Sustran, Walkable Neighbourhoods' publication (attached). Much of the Exmo_20 site is beyond 800m from existing services and facilities. Attached is a map demonstrating this by showing 800m radiuses from existing primary schools, taking no account for actual non 'as the crow flies' distances and the significant local topography. Therefore, unless significant services and facilities are part of the Exmo_20 masterplan and delivered, much of Exmo_20 is in an unsustainable location. This is even more significant for Exmo_20, as if the future residents rely on car use for accessing services and facilities, the main access point is via the country road, requiring driving over 2 miles to get back the outskirts of Exmouth, further compounding its unsustainability. It is appropriate that this site was deemed 'not suitable and not achievable'.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Other sites, which did pass HELAA and were shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that the 800m (1.6km 'there & back') figure is used to determine site allocations for larger settlements and developments.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site maps for Exmo_20 are conflicting with NPPF chapter 3 'Plan Making' where it states that plans should be 'up to date'. The EDDC have been contacted on numerous times to update the map for Exmo_20 and to stop promoting the site with land that is not available (i.e. existing homes, listed buildings and the grade II * church and its lands). This was confirmed and the settlement boundaries identified at the end of 2024. However, page 326 of the 'Sustainability Appraisal Report' shows the 'Tier One - Principal Centre Settlement Exmouth' map with the 2022 map outline for Exmo_20, as is the map on page 96 of the 'Site Allocations (SAL) for Exmouth' (SAL-022). The 2022 maps should not be used in the up to date documentation, it only causes confusion.

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.: Ensure that all February 2025 documentation and maps are up to date and reflect the outline for Exmo_20 as per the 'East Devon Local Plan 2020-2042 (Reg 19 Consultation) inset to Policies map' highlighted in blue on this map, as is the map on page 97 of the 'Site Allocations (SAL) for Exmouth'. Remove the map on page 96 of the 'Site Allocations (SAL) for Exmouth'. Use the correct map on page 326 of the 'Sustainability Appraisal Report'. Please note these are the only ones I have found, there may be other discrepancies.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Site reference Exmo_20 as a 'complete' site has NEVER been consulted on as a whole site, and sites Exmo_20a and Exmo_20b should NEVER have been created (see main evidence attached). In addition to the attached evidence the following is to be noted.

The document 'TR1-023 East Devon Local Plan Initial Site Assessments - Transport', (which is available within the evidence library, but I have attached for ease) details information for sites Exmo_20a and Exmo_20b, NOT Exmo_20. The site Exmo_20 as a 'whole' is a totally different consideration, and this again proves that it has NOT been consulted on as a 'whole site'. There is also one thing to note, the vehicular access restrictions (modest development, and majority development phrases) highlighted in the draft Local Plan for Exmo_20, means that the site will 'at best', be SPLIT due to Southern Wood access issues, or 'worst', ALL access for the site will be via the B3179.

Regardless of the above, the details given for the Exmo_20a and Exmo_20b sites are also incorrect and need to be corrected as follows.

Exmo_20a 'Local centre proximity', the main access is via the B3179, so the town centre is over 6km away via this route and from the middle of the site there are no facilities within 800m (so should be RED). The 'bus provision', why would a bus provider come into the site and back out via the same access route just for this site? Highly unlikely (so should be RED). The 'rail provision', via the B3179 the train station is over 6km away (so should be RED). The 'active travel (notes existing)', it states that the 'Main road has

pavements currently but lack of crossing points and is very busy.', this is a copy of what they have for Exmo_20b, however, the 'main road' for Exmo_20a is the B3179 which has NO pavements, and NO crossing points, and is VERY busy (so should be RED). The 'active travel (notes potential)', states that 'Active Travel links included within this proposal. Externall this site will benefit from the Dinan Way improvements', the main access point for this site is the B3179, this site will NOT benefit from the Dinan Way Improvement (so should be RED). based on the above Exmo_20a should be RED overall. It is alarming that this evidence has been allowed to be submitted. A member of the public should not be identifying these basic errors.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand why Exmo_20 is still seen as viable and or sustainable, taking into account all of the issues with this site. Not to mention the fact that it should never have been considered even at Reg 18 stage.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 as a 'complete' site has NEVER been consulted on as a whole site, and sites Exmo_20a and Exmo_20b should NEVER have been created (see main evidence attached). In addition to the attached evidence the following is to be noted.

The document 'TR1-023 East Devon Local Plan Initial Site Assessments - Transport', (which is available within the evidence library, but I have attached for ease) details information for sites Exmo_20a and Exmo_20b, NOT Exmo_20. The site Exmo_20 as a 'whole' is a totally different consideration, and this again proves that it has NOT been consulted on as a 'whole site'. There is also one thing to note, the vehicular access restrictions (modest development, and majority development phrases) highlighted in the draft Local Plan for Exmo_20, means that the site will 'at best', be SPLIT due to Southern Wood access issues, or 'worst', ALL access for the site will be via the B3179.

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pavements currently but lack of crossing points and is very busy.', this is a copy of what they have for Exmo_20b, however, the 'main road' for Exmo_20a is the B3179 which has NO pavements, and NO crossing points, and is VERY busy (so should be RED). The 'active travel (notes potential)', states that 'Active Travel links included within this proposal. Externall this site will benefit from the Dinan Way improvements', the main access point for this site is the B3179, this site will NOT benefit from the Dinan Way Improvement (so should be RED). based on the above Exmo_20a should be RED overall. It is alarming that this evidence has been allowed to be submitted. A member of the public should not be identifying these basic errors.

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.: Amend the incorrect data as identified. Remove Exmo_20 from the Draft Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand why Exmo_20 is still seen as viable and or sustainable, taking into account all of the issues with this site. Not to mention the fact that it should never have been considered even at Reg 18 stage.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPF Chapter 3. Site reference Exmo_20 as a 'complete' site has NEVER been consulted on as a whole site, and sites Exmo_20a and Exmo_20b should NEVER have been created (see main evidence attached). In addition to the attached evidence the following is to be noted.

The document 'TR1-023 East Devon Local Plan Initial Site Assessments - Transport', (which is available within the evidence library, but I have attached for ease) details information for sites Exmo_20a and Exmo_20b, NOT Exmo_20. The site Exmo_20 as a 'whole' is a totally different consideration, and this again proves that it has NOT been consulted on as a 'whole site'. There is also one thing to note, the vehicular access restrictions (modest development, and majority development phrases) highlighted in the draft Local Plan for Exmo_20, means that the site will 'at best', be SPLIT due to Southern Wood access issues, or 'worst', ALL access for the site will be via the B3179.

Regardless of the above, the details given for the Exmo_20a and Exmo_20b sites are also incorrect and need to be corrected as follows.

Exmo_20a 'Local centre proximity', the main access is via the B3179, so the town centre is over 6km away via this route and from the middle of the site there are no facilities within 800m (so should be RED). The 'bus provision', why would a bus provider come into the site and back out via the same access route just for this site? Highly unlikely (so should be RED). The 'rail provision', via the B3179 the train station is over 6km away (so should be RED). The 'active travel (notes existing)', it states that the 'Main road has pavements currently but lack of crossing points and is very busy.', this is a copy of what

they have for Exmo_20b, however, the 'main road' for Exmo_20a is the B3179 which has NO pavements, and NO crossing points, and is VERY busy (so should be RED). The 'active travel (notes potential)', states that 'Active Travel links included within this proposal. Externall this site will benefit from the Dinan Way improvements', the main access point for this site is the B3179, this site will NOT benefit from the Dinan Way Improvement (so should be RED). based on the above Exmo_20a should be RED overall. It is alarming that this evidence has been allowed to be submitted. A member of the public should not be identifying these basic errors.

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.: Amend the incorrect data as identified. Remove Exmo_20 from the Draft Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that all of the evidence that I have amassed is taken into account and to finally get some answers with regards to why site reference Exmo_20 is still seen as viable and or sustainable. This site has NEVER had a fair hearing and it is about time this was recognised. Not to mention the fact that it should never have been considered even at Reg 18 stage.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. There has been quite a large amount of sites put forward in the Reg 18 consultation phase that should not have been included due to the fact that they failed Stage 2 'site sifting'. These sites are all classed as 'rejected' and even state within their 'very brief' descriptions that they have indeed failed 'site sifting'. I have been informed by the EDDC Planning Policy Team that any site that passed Stage 2 site sifting would go through to the Reg 18 consultation phase. However, these sites DID NOT pass Stage 2 site sifting, so should NOT have gone through to the Reg 18 consultation phase. This raises concerns around the utilisation/adherence by EDDC to their own processes and procedures. Specifically in relation to the 'Site Selection Methodology' (dated May 2022) and the HELAA Report (dated November 2022). Please see the attached evidence to support the above. In addition to the above, It is also worrying that EDDC have agreed to the inclusion of 'rejected' sites within the Reg 18 submissions, seemingly with the view that if the site receives a comment, then they can class it as consulted on, and can therefore bring it forward for allocation at a later stage (as they have done with site Exmo_20a). If EDDC thought that documents or reports were 'not fit for purpose' then they should have amended them then and there, and not put them forward as evidence. It is also to be noted that within the Reg 19 documents, sites that have 'not been allocated' are also still included in the maps (highlighted in red). Does this mean that they could be brought back in at the planning stage because they can be classed as having been through the consultation phase? This is again rather worrying, why have them included?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand why Exmo_20 is still seen as viable and or sustainable, taking into account all of the issues with this site Not to mention the fact that it should never have been considered even at Reg 18 stage.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. There has been quite a large amount of sites put forward in the Reg 18 consultation phase that should not have been included due to the fact that they failed Stage 2 'site sifting'. These sites are all classed as 'rejected' and even state within their 'very brief' descriptions that they have indeed failed 'site sifting'. I have been informed by the EDDC Planning Policy Team that any site that passed Stage 2 site sifting would go through to the Reg 18 consultation phase. However, these sites DID NOT pass Stage 2 site sifting, so should NOT have gone through to the Reg 18 consultation phase. This raises concerns around the utilisation/adherence by EDDC to their own processes and procedures. Specifically in relation to the 'Site Selection Methodology' (dated May 2022) and the HELAA Report (dated November 2022). Please see the attached evidence to support the above. In addition to the above, It is also worrying that EDDC have agreed to the inclusion of 'rejected' sites within the Reg 18 submissions, seemingly with the view that if the site receives a comment, then they can class it as consulted on, and can therefore bring it forward for allocation at a later stage (as they have done with site Exmo_20a). If EDDC thought that documents or reports were 'not fit for purpose' then they should have amended them then and there, and not put them forward as evidence. It is also to be noted that within the Reg 19 documents, sites that have 'not been allocated' are also still included in the maps (highlighted in red). Does this mean that they could be brought back in at the planning stage because they can be classed as having been through the consultation phase? This is again rather worrying, why have them included?

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.: EDDC need to seriously look at their policies and procedures and see if they are ‘fit for purpose’ before claiming to have applied/adhered to them. In this case out of the 50 plus sites identified, only 8 seem to have made it to Reg 19. Therefore, these sites should be removed from the plan, and are Exmo_20 (as Exmo_20a and Exmo_20b are on the list), Exmo_08, Exmo_47, Axmi_10, Brcl_29, GH/ED/39a and GH/ED/39b.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand why based on all the evidence against allocating Exmo_20, that EDDC are still going ahead.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPF Chapter 3. There has been quite a large amount of sites put forward in the Reg 18 consultation phase that should not have been included due to the fact that they failed Stage 2 'site sifting'. These sites are all classed as 'rejected' and even state within their 'very brief' descriptions that they have indeed failed 'site sifting'. I have been informed by the EDDC Planning Policy Team that any site that passed Stage 2 site sifting would go through to the Reg 18 consultation phase. However, these sites DID NOT pass Stage 2 site sifting, so should NOT have gone through to the Reg 18 consultation phase. This raises concerns around the utilisation/adherence by EDDC to their own processes and procedures. Specifically in relation to the 'Site Selection Methodology' (dated May 2022) and the HELAA Report (dated November 2022). Please see the attached evidence to support the above.

In addition to the above, It is also worrying that EDDC have agreed to the inclusion of 'rejected' sites within the Reg 18 submissions, seemingly with the view that if the site receives a comment, then they can class it as consulted on, and can therefore bring it forward for allocation at a later stage (as they have done with site Exmo_20a).

If EDDC thought that documents or reports were 'not fit for purpose' then they should have amended them then and there, and not put them forward as evidence.

It is also to be noted that within the Reg 19 documents, sites that have 'not been allocated' are also still included in the maps (highlighted in red). Does this mean that they could be brought back in at the planning stage because they can be classed as

having been through the consultation phase? This is again rather worrying, why have them included?

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand why Exmo_20 is being promoted without any valid reasons.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

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4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Site reference Exmo_20 was deemed 'available BUT NOT achievable or suitable' in the HELAA report back in November 2022, and therefore not available to be consulted on at Reg 18. The only site associated with Exmo_20 and deemed suitable as 'second choice', was Exmo_46. This site should have been the only one going through to Reg 18. However, for some unexplained reason, this site has been ignored. The validity of Exmo_46 can be confirmed by checking the relevant KEY supporting evidence documents for the Reg 18 consultation, which are the HELAA Report, The Sustainability Appraisal Report and the 'Exmouth sites - additional information' document. The fact that two NEW sites Exmo_20a and Exmo_20b, suddenly appear on maps at the Strategic Planning Committee meeting on the 1st November 2022 is questionable (see the evidence titled 'New sites evidence' with email trail dated 20/03/2025). It is to be noted that these two NEW sites are not mentioned or discussed at this meeting (I have watched the youtube video of the meeting and went through the minutes and documents for this meeting). This is six days before Reg 18 starts, and more importantly these two NEW sites are not mentioned in any of the three KEY evidence reports/documents mentioned above. Taking all of the above into account, the sites Exmo_20a, Exmo_20b and Exmo_20 have no valid reason for being in Reg 18, and therefore should not have been discussed on the 3rd September 2024, which ultimately means that Exmo_20 cannot be put through for Reg 19 consultation. Please see evidence that has been provided alongside this submission. FOR THE — Site Selection Methodology (dated May 2022), the HELAA Report (November 2022), the Sustainability Appraisal Report (dated November 2022) and the 'Exmouth sites - additional information' document, these can be found on the EDDC website.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to hear why Exmo_20 has got to this stage. As based on the EDDC's own documents and processes this site should NEVER have even got to Reg 18 consultation.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 was deemed 'available BUT NOT achievable or suitable' in the HELAA report back in November 2022, and therefore not available to be consulted on at Reg 18. The only site associated with Exmo_20 and deemed suitable as 'second choice', was Exmo_46. This site should have been the only one going through to Reg 18. However, for some unexplained reason, this site has been ignored. The validity of Exmo_46 can be confirmed by checking the relevant KEY supporting evidence documents for the Reg 18 consultation, which are the HELAA Report, The Sustainability Appraisal Report and the 'Exmouth sites - additional information' document. The fact that two NEW sites Exmo_20a and Exmo_20b, suddenly appear on maps at the Strategic Planning Committee meeting on the 1st November 2022 is questionable (see the evidence titled 'New sites evidence' with email trail dated 20/03/2025). It is to be noted that these two NEW sites are not mentioned or discussed at this meeting (I have watched the youtube video of the meeting and went through the minutes and documents for this meeting). This is six days before Reg 18 starts, and more importantly these two NEW sites are not mentioned in any of the three KEY evidence reports/documents mentioned above. Taking all of the above into account, the sites Exmo_20a, Exmo_20b and Exmo_20 have no valid reason for being in Reg 18, and therefore should not have been discussed on the 3rd September 2024, which ultimately means that Exmo_20 cannot be put through for Reg 19 consultation. Please see evidence that has been provided alongside this submission. FOR THE — Site Selection Methodology (dated May 2022), the HELAA Report (November 2022), the Sustainability Appraisal Report (dated November 2022) and the 'Exmouth sites - additional information' document, these can be found on the EDDC website.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of

any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The Reg 18 and Reg 19 processes/procedures seem to have been ignored in respect to site Exmo_20.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

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matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The EDDC processes/procedures seem to have been totally ignored in relation to site Exmo_20 and Exmo_46.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are inconsistencies within the policies SP04, SD01 and SD02. Site Axmi_11c is described within SD02, yet site Axmi_11a is mentioned within the Spatial Strategy SP04 on page 39. Where did Axmi_11c come from as this was not in Reg 18? Site reference GH/ED/80a is described within SD02, yet site GH/ED/80 is mentioned within the Spatial Strategy SP04 on page 39, and is also mentioned within the description for site reference Axmi_22 in SD02. Site reference Exmo_20 is described within SD01, yet site reference Exmo_20b is mentioned within the Spatial Strategy SP04 on page 39.

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.: Resolve the inconsistencies identified.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are inconsistencies within the policies SP04, SD01 and SD02. Site Axmi_11c is described within SD02, yet site Axmi_11a is mentioned within the Spatial Strategy SP04 on page 39. Where did Axmi_11c come from as this was not in Reg 18? Site reference GH/ED/80a is described within SD02, yet site GH/ED/80 is mentioned within the Spatial Strategy SP04 on page 39, and is also mentioned within the description for site reference Axmi_22 in SD02. Site reference Exmo_20 is described within SD01, yet site reference Exmo_20b is mentioned within the Spatial Strategy SP04 on page 39.

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.: Resolve the inconsistencies identified.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. At the Strategic Planning Committee (SPC) meeting on the 1st November 2022 a total of 17 sites had NEW 'a' and 'b' site references added for inclusion in the Reg 18 Consultation process. None of these NEW sites were discussed/approved at this meeting, they were only introduced as part of the report pack for this meeting within the site maps, and no reason was provided for the introduction of these new sites (I have attached details of these sites as evidence below). There was a resolution passed at this meeting on the 1st November 2022 as follows 'Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content;'. I have received written confirmation from the current Chair of the SPC stating that 'Neither Mr Freeman nor Mr Dickins nor myself have any authority to unilaterally remove (or, indeed, add) sites from the plan', (see attached evidence for this submission). The inclusion of 34 NEW sites cannot be seen as 'minor'!!! None of these 'a' and 'b' sites are mentioned in the HELAA, Sustainability Appraisal Report or in the 'Sites Additional Information' documents. These reports and documents form the KEY evidence to support the Draft Local Plan for the Reg 18 consultation. The breakdown of the original site references into two parts completely changes the descriptions for each individual part of the site, and should have been discussed in detail and correctly assessed and agreed by the SPC. A change of this magnitude should have been identified somewhere, but there is no evidence in the meeting notes or YouTube videos that this ever took place.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of

any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I do not know where to start.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policies SP01, TR03, OL09 and OL05, along with paragraphs 11.2 and 3.34. The description in the Draft Local Plan for Exmo_20 in relation to the vehicular access is ambiguous and open to interpretation. It states that 'Vehicular access to accommodate modest levels of development, will be allowed for southern site parts from the road Southern Wood.... Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the North'. So 'modest' can be anything from 0% to 49% of development (0 to 343 homes), and 'bulk' can be anything from 51% to 100% of development (357 to 700 homes). I have asked for clarity with regards to the vehicular access for Exmo_20 on numerous occasions without any further clarification forthcoming (see attached evidence for an example of this). Due to this uncertainty I have been pushed to raise numerous submissions to cover all possibilities. This submission relates to the 49% and 51% option. This means that the site will effectively be split into two, as access to the North and South of the sites will have to be restricted to stop residents utilising both access points. This highlights new 'major' concerns for the Southern Wood access point, as this means that a development the same size as currently accessing Dinan Way from Meadowview Road, will be coming through Southern Wood (currently a cul-de-sac), onto Meadowview Road then onto Dinan Way. So, 'doubling' the amount of traffic currently using these routes which are already congested. This will still result in the majority of residents having to travel over half a mile just to get out of the site, then another 4.3 miles to get to Exmouth town centre, or 2.2 miles to Budleigh Salterton town centre.

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.: Stop site Exmo_20 now.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policies SP01, TR03, OL09 and OL05, along with paragraphs 11.2 and 3.34. The description in the Draft Local Plan for Exmo_20 in relation to the vehicular access is ambiguous and open to interpretation. It states that 'Vehicular access to accommodate modest levels of development, will be allowed for southern site parts from the road Southern Wood.... Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the North'. So 'modest' can be anything from 0% to 49% of development (0 to 343 homes), and 'bulk' can be anything from 51% to 100% of development (357 to 700 homes). I have asked for clarity with regards to the vehicular access for Exmo_20 on numerous occasions without any further clarification forthcoming (see attached evidence for an example of this). Due to this uncertainty I have been pushed to raise numerous submissions to cover all possibilities. This submission relates to the 0% and 100% option. This means that ALL vehicular access will be from the North of the site via the B3179. This will result in ALL of the residents having to travel over half a mile just to get out of the site, then another 4.3 miles to get to Exmouth town centre , or 2.2 miles to Budleigh Salterton town centre.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Site reference Exmo_20 was deemed 'available BUT NOT achievable or suitable' in the HELAA report back in November 2022. Using the 'Site Selection Methodology' document that was in effect at the time (dated May 2022, confirmed by email from the EDDC Planning Policy Team dated 12/03/2025), Exmo_20 failed Stage 2 'site sifting', as the criteria states that sites MUST be 'available, achievable and suitable' to meeting the criteria for going forward to consultation. The fact that sites have to pass Stage 2 'site sifting' to go through to consultation is confirmed in an email from the Planning Policy team dated 03/03/2025. Based on all of the above, Exmo_20 should not have been put forward for Reg 18 consultation (and Exmo_20a and Exmo_20b should never have existed). Email evidence can be found attached to this submission, and the HELAA and Site Selection Methodology document (dated May 2022) can be found on the EDDC website.

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.: EDDC have failed to comply with their duty to co-operate in relation to sites Exmo_20, Exmo_20a, Exmo_20b and Exmo_46.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 was deemed 'available BUT NOT achievable or suitable' in the HELAA report back in November 2022. Using the 'Site Selection Methodology' document that was in effect at the time (dated May 2022, confirmed by email from the EDDC Planning Policy Team dated 12/03/2025), Exmo_20 failed Stage 2 'site sifting', as the criteria states that sites MUST be 'available, achievable and suitable' to meeting the criteria for going forward to consultation. The fact that sites have to pass Stage 2 'site sifting' to go through to consultation is confirmed in an email from the Planning Policy team dated 03/03/2025. Based on all of the above, Exmo_20 should not have been put forward for Reg 18 consultation (and Exmo_20a and Exmo_20b should never have existed). Email evidence can be found attached to this submission, and the HELAA and Site Selection Methodology document (dated May 2022) can be found on the EDDC website.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Site Exmo_20 should never have made it to Reg 18 consultation never mind Reg 19 if EDDC's own procedures and processes had been followed.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPF Chapter 3. Site reference Exmo_20 was deemed 'available BUT NOT achievable or suitable' in the HELAA report back in November 2022. Using the 'Site Selection Methodology' document that was in effect at the time (dated May 2022, confirmed by email from the EDDC Planning Policy Team dated 12/03/2025), Exmo_20 failed Stage 2 'site sifting', as the criteria states that sites MUST be 'available, achievable and suitable' to meeting the criteria for going forward to consultation. The fact that sites have to pass Stage 2 'site sifting' to go through to consultation is confirmed in an email from the Planning Policy team dated 03/03/2025. Based on all of the above, Exmo_20 should not have been put forward for Reg 18 consultation (and Exmo_20a and Exmo_20b should never have existed). Email evidence can be found attached to this submission, and the HELAA and Site Selection Methodology document (dated May 2022) can be found on the EDDC website.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I do not believe that the decisions made in relation to

site Exmo_20 have been following EDDC's own methodologies and processes/procedures.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 as a 'complete' site was NOT put forward for the Regulation 18 consultations. However, this site was suddenly reinstated at the Strategic Planning Committee meeting on the 3rd September 2024, due to the two sites Exmo_20a and Exmo_20b being put forward as allocated. As above, Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022. In addition to this, despite numerous requests by concerned residents, there has been no further consideration or representation permitted since the this site was recreated on the 3rd September 2024.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed 'not suitable or achievable' within the HELAA Report November 2022, and was therefore NOT put forward for the Regulation 18 consultations. Which means that the public and relevant stakeholders including Statutory Bodies (e.g. Natural England, Devon County Council, etc.) have not had a chance to consult on site Exmo_20.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 as a 'complete' site was NOT put forward for the Regulation 18 consultations. However, this site was suddenly reinstated at the Strategic Planning Committee meeting on the 3rd September 2024, due to the two sites Exmo_20a and Exmo_20b being put forward as allocated. As above, Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022. In addition to this, despite numerous requests by concerned residents, there has been no further consideration or representation permitted since the this site was recreated on the 3rd September 2024.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with policy AR01(B). The proposed site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The land is regularly waterlogged due to the soil type and is not suitable for a development of this size. The land is already an identified flood risk through the lower lying land at the bottom of the site and down through Withycombe, and the proposed development on this steep sloping site can only increase this risk.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This area is not suitable for development, remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 3.30. This plan fails to robustly protect the SSSI Pebblebed Heaths. The settlement boundary around this site includes the 400m buffer zone adjoining the Pebblebed Heaths, effectively defining this land as acceptable for development. Although housing cannot be built within this buffer zone, by including it within the settlement boundary gives the impression that it may be available for other kinds of development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We need to protect our countryside. Stop Exmo_20 now.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL05. The main access point for this site is via the B3179. Which means that residents will have to travel between 4.2 and 4.3 miles to get to the centre of Exmouth, whereas the centre of Budleigh Salterton is only 2.2 miles. This makes Budleigh Salterton significantly more accessible to the residents of this development for key facilities/services. Currently Exmouth and Budleigh are separated in terms of functionality but this development would effectively merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. This is also a large site, so is Budleigh ready for this sudden increased demand?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site is not viable. Take Exmo_20 out of the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy HE02 - Development at this site will encircle the Grade II* listed St. John in the Wilderness Church and will have significant adverse effects on the remoteness and tranquillity that is so unique to this church and its surroundings. This development will result in the loss of a unique peaceful and tranquil setting, not only for the congregation, but also the numerous visitors that come to pay their respect's to their relatives in the churchyard, and also those that visit the area to see the church and its settings.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL01. The site is noted for its dark skies, tranquillity and wildness. The proposed site will encircle the Grade II* listed St John is the Wilderness Church and churchyard, which will result in its tranquillity, remoteness and dark skies being lost forever, regardless of any buffer zone being provided. Along with the new light from the proposed housing development itself, and with the main access for the site being onto the B3179, which is directly opposite the SPA/SAC/SSSI, this would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Pebblebed Heaths as vehicles exit the site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This development will ruin this area. Remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines ‘irreplaceable habitat’ as “habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed”. Development of this site will result in the loss of irreplaceable habitats. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. This site has a vast amount of mature trees, which provide unique micro habitats and any loss cannot simply be mitigated by planting new trees. This site also contains many long-established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and even if the developers promise that space can be left around them, the loss and reduction of habitat is unavoidable. The variety of wildlife that live and frequent in these fields, trees and hedgerows, will undoubtedly be affected by this development. The whole of this site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the SSSI Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be lost forever by the development of this site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 13.23. The whole of this site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of this SPA. This site provides a means of connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of this site. The amount and variety of wildlife that utilises this land and the nearby SSSI Pebblebed Heaths is amazing, and will be lost if this site is developed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with paragraph 2.10, objective 8. This will result in the loss of a considerable amount of land that provides an abundance of biodiversity, both on site and on the adjacent SAC/SPA/SSSI. This will adversely affect the natural environment.

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.: Stop destroying our countryside, remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (dated 30.01.25) highlights that there is “currently not sufficient certainty to rule out advert effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).” With the majority of the traffic from this site going via the B3179 which runs along the edge of the SSSI Pebblebed Heaths (SAC/SPA), the emissions/pollution created will undoubtedly have a ‘negative’ impact on the air quality in this area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not destroy out environment, remove this site from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL09. The The Habitats Regulations Assessment (dated 30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. The main access point for this site is via the B3179 which runs along the edge of the SSSI Pebblebed Heaths. This will lead to an increase in emissions due to the increase in traffic, which will also have a huge ‘negative’ impact on the air quality here.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site is not viable, stop it now.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 2.6; This site is classed as 'Rural East Devon' due to its position outside of Exmouth. This development will destroy not only the open countryside within it, but will also destroy the setting of a grade II * listed Church and churchyard which is currently in the middle of it. This is the largest development on Exmouth and if approved will destroy yet another part of Rural East Devon.

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 this site from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. No new sustainable travel arrangements have been proposed for this site that are viable. The site will not promote walking/cycling due to the fact that it slopes steeply from North to South. The main access point onto the B3179 for this development will generate major amounts of vehicle movements just to access services within Exmouth and the neighbouring villages. This will also lead to an increase in travel to and from the main towns/cities, and access to the main route out of the area via the M5.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site is not viable, stop it now.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 3.34: This site will not add any crucial infrastructure such as a secondary school, doctors surgery, or dentists surgery. It will only add to an already creaking infrastructure. In addition to this, it will also increase the pressure on our sewage system, which already has major issues and is regularly closing down our beaches and areas on the Maer. This has been highlighted several times on national news and via the press. How long before Exmouth becomes a place to avoid?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from this plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 11.2. The Draft Local Plan states that the access point for the majority of this site (if not all) be at the North of the site via the B3179. This access point is approximately 4.3 miles from the centre of Exmouth and onto an already congested road that also is the main route in and out of Budleigh Salterton. This is a busy route on a daily basis, and gets even worse in the holiday seasons. This will result in increased car travel requirements for the majority (if not all) of the site. This proposed site is the largest in Exmouth, and its location does not promote less travel, nor will it do anything to reduce traffic congestion in and out of Exmouth. This site cannot be classed as sustainable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site is not sustainable, remove it from the local plan now.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy TR01. This site slopes steeply from North to South, walking and/or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc. as the distances are too far. The provision of walking routes, cycle paths or public transport will not alleviate the amount of car journeys this development would generate, especially taking into account the fact that the site topography, and the distance people will have to travel to access essential services/facilities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal of site Exmo_20 is in conflict with paragraph 11.6. This site slopes steeply downhill from the North to the South. Regardless of what the developer says, this will not promote walking and cycling. Key services and facilities for the bulk of this site are not within the stated 800m (approx 10 mins walk). The likelihood is that residents will need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring towns/villages. Who walks to do their main shopping, visit the doctors, dentists, etc? This site is too isolated to be sustainable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site is not viable, stop it not.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy SP01. This site cannot be seen as promoting the most significant levels of development as the principal centre of Exmouth. This is the largest proposed development for Exmouth, yet the main access point for this site is via the B3179, which makes Budleigh Salterton town centre (at 2.2 miles away) over 2 miles closer than Exmouth Town centre. This site cannot be considered to be a development in Exmouth and is an unsustainable location.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not allocate this site as it is not viable

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed 'not suitable or achievable' within the HELAA Report November 2022, and was therefore NOT put forward for the Regulation 18 consultations. Which means that the public and relevant stakeholders including Statutory Bodies (e.g. Natural England, Devon County Council, etc.) have not had a chance to consult on site Exmo_20.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 as a 'complete' site was NOT put forward for the Regulation 18 consultations. However, this site was suddenly reinstated at the Strategic Planning Committee meeting on the 3rd September 2024, due to the two sites Exmo_20a and Exmo_20b being put forward as allocated. As above, Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022. In addition to this, despite numerous requests by concerned residents, there has been no further consideration or representation permitted since the this site was recreated on the 3rd September 2024.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPFChapter 3. Site reference Exmo_20 as a 'complete' site was NOT put forward for the Regulation 18 consultations. However, this site was suddenly reinstated at the Strategic Planning Committee meeting on the 3rd September 2024, due to the two sites Exmo_20a and Exmo_20b being put forward as allocated. As above, Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022. In addition to this, despite numerous requests by concerned residents, there has been no further consideration or representation permitted since the this site was recreated on the 3rd September 2024.

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.: Stop Exmo_20 now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Submit this under Chapter 5 - policy SD01. Select 'No' to being sound. Proposed site Exmo_20 is in conflict with policy AR01(B). The proposed site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The land is regularly waterlogged due to the soil type and is not suitable for a development of this size. The land is already an identified flood risk through the lower lying land at the bottom of the site and down through Withycombe, and the proposed development on this steep sloping site can only increase this risk.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Submit this under Chapter 5 - policy SD01. Select 'No' to being sound. Site Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around this site includes the 400m buffer zone adjoining the Pebblebed Heaths, effectively defining this land as acceptable for development. Although housing cannot be built within this buffer zone, by including it within the settlement boundary gives the impression that it may be available for other kinds of development. Which effectively means that the plan fails to robustly protect the SSSI Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop this site now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Submit this under Chapter 5 - Policy SD01. Select 'No' to being sound. Site Exmo_20 is in conflict with policy OL05. The local plan states that the majority of the development will utilise the main access point for this site (via the B3179). This means that residents will have to travel between 4 and 4.3 miles to get to the centre of Exmouth, whereas the centre of Budleigh Salterton is only 2.2 miles, which makes Budleigh Salterton significantly more accessible to the residents of this development. The High Street, Doctor's surgery, Dentists, schools, beach etc in Budleigh would be the most accessible and obvious choices for residents of this site. Currently Exmouth and Budleigh are separated in terms of functionality but this development would effectively merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy HE02 - The bulk of the proposed 700 to 1000 homes for this site will encircle the Grade II* listed St. John in the Wilderness Church and will have significant adverse effects on the remoteness and tranquillity that is so unique to this church, its surroundings and churchyard. This development will drastically alter this peaceful and tranquil setting, not only for the congregation, but also the numerous visitors that come to pay their respect's to their relatives in the churchyard, and also those that visit the area to see the church and its settings.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This will destroy the setting around our Church, stop this now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL01. The site is noted for its dark skies, tranquillity and wildness. Along with the new light from the proposed housing development itself, and with the main access for the site being onto the B3179, which is directly opposite the SPA/SAC/SSSI, this would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Pebblebed Heaths as vehicles exit the site. St John in the Wilderness church and its surrounding area is noted for its remoteness, tranquillity, and the dark skies (especially when within the churchyard itself). The proposed site will encircle this Grade II* listed Church and churchyard, which will result in its tranquility, remoteness and dark skies being lost forever, regardless of any buffer zone being provided.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines ‘irreplaceable habitat’ as “habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed”. Development of this site will result in the loss of irreplaceable habitats. This site has a vast amount of mature trees, which provide unique micro habitats and any loss cannot simply be mitigated by planting new trees. This site also contains many long-established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and even if the developers promise that space can be left around them, degradation and fragmentation of habitat is unavoidable. The variety of wildlife that live and frequent in these fields, trees and hedgerows, will undoubtedly be affected by this development. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. The whole of this site lies within an identified ‘Strategic Nature Area’ (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the SSSI Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by this development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the plan.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 13.23. The whole of this site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network. This site provides a means of connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of this site. The amount of wildlife that utilises this land and the nearby SSSI Pebblebed Heaths is diverse. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of this SPA.

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.: Stop destroying the natural environment, choose another more acceptable area to build.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with paragraph 2.10, objective 8. This will result in the loss of a considerable amount of land that provides an abundance of biodiversity, both on site and on the adjacent SAC/SPA/SSSI. This will adversely affect the natural environment.

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.: Stop destroying this land, remove Exmo_20 from the plan now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy PB04. With the majority of the traffic from this site going via the B3179 which runs along the edge of the SSSI Pebblebed Heaths (SAC/SPA), the emissions/pollution created will undoubtedly impact the air quality in this area. The Habitats Regulations Assessment (dated 30.01.25) highlights that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

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.: Stop this site now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL09. The main access point for this site is via the B3179 which runs along the edge of the SSSI Pebblebed Heaths. The emissions for this increase in traffic will have a huge impact on the air quality here. This is highlighted in the Habitats Regulations Assessment (dated 30.01.25) which confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, stop it now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with policy PB01 and is not in accordance with the mitigation strategy. The number of houses being proposed at this site will cause considerable harm to the SSSI Pebblebed Heaths . There must be numerous alternative sites that could accommodate the housing requirement which would cause less or no harm to the SSSI Pebblebed Heaths (SAC/SPA).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 2.6; The land to be destroyed by this development is currently open countryside, with a grade II * listed Church and churchyard in the middle of it. This is not a small development. It is a vast development within a rural part of East Devon.

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.: Stop promoting this site.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. The main access point via the B3179 for this development will generate major amounts of vehicle movements just to access services within Exmouth and the neighbouring villages. The site slopes steeply downwards from top to bottom and is within a remote location far from infrastructure and services. The majority of travelling from this car will be done via car as the walking or cycling routes provided with this site will provide limited viable alternative options. The local plan states that congestion is a particular issue in Western East Devon, and with this site having no (or limited) access to Dinan Way and the A376, the bulk of the vehicle movements from this site will be on rural B roads, which are already congested and in need of improvement.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 3.34: Exmouth may be classed as a tier 1 settlement, however, it does not have sufficient infrastructure and services for the existing population, never mind these proposed additions. This development will not add another Doctors surgery or Dentists surgery - both of which are already insufficient for the current population of Exmouth. Nor will it provide another secondary school - which the area is crying out for. There is already a major sewerage issue in the town and surrounding areas, with sewage being discharged into the sea and onto our park areas on a regular basis, and this is before any additional developments adding to the problem.

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 this site from the plan

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 11.2. According to the plan, the 'bulk' of the development will utilise the access point at the North of the site via the B3179. This will result in increased car travel requirements for the majority (if not all) of the site. The B3179 access point is adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, so a 0.3 of a mile drive just to get from the site entrance to the housing, and therefore, upwards of over 0.5 miles of 'on site' driving for most residents every time they went out and returned home. In addition to this, from the B3179 site entrance you need to drive between 4.0-4.3 miles to get into Exmouth centre. This site is a large site and its positioning does not promote less travel, nor will it do anything to reduce traffic congestion in and out of Exmouth. This site cannot be classed as sustainable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20 is not sustainable, remove from the plan

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy TR01. Walking and/or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc. as the distances are too far. The studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, however, beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Residents living at the Northern part of this site will have to walk nearly 0.5 miles to get to the bottom of the site. This site is remote, and residents will have to travel significantly further than 0.5 miles or even 1 mile to get to essential services etc. . Walking or cycling as first choice of transport for this site is not realistic. The provision of walking routes, cycle paths or public transport will not alleviate the amount of car journeys this development would generate, especially taking into account the fact that the site slopes steeply from North to South, and the distance people will have to travel to access essential services/facilities.

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.: Stop promoting Exmo_20

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal of site Exmo_20 is in conflict with paragraph 11.6. This is the largest development in Exmouth. Key services and facilities for the majority (if not all) of this site are not within the stated 800m (approx 10 mins walk). The likelihood is that residents will need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring towns/villages. This site slopes steeply upwards from South to North and does not promote walking or cycling, especially not for shopping, doctors, dentists, school, etc.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy SP01. The proposal for Exmo_20 is for the 'bulk' of the development to utilise the access route at the northern part of the site via the B3179. Exmouth town centre is approximately 4.2 miles from this access point, yet Budleigh town centre is only approximately 2.2 miles away. How can this site be considered to be a development in Exmouth? Based on this information this site is an unsustainable location.

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.: Stop Exmo_20

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed 'not suitable or achievable' within the HELAA Report November 2022. It has never been either preferred or 2nd choice, therefore the site and was therefore NOT put forward for the Regulation 18 consultations. Therefore, the public and relevant stakeholders including Statutory Bodies (e.g. Natural England, Devon County Council, etc.) have not had a chance to consult on site Exmo_20.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" within the HELAA Report November 2022. This site has never been either preferred or 2nd choice and was therefore NOT put forward for the Regulation 18 consultations. At the Strategic Planning Committee meeting on the 3rd September 2024, the site was 'recreated' as a result of sites Exmo_20a and Exmo_20b being put forward as allocated. The site Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022, and as of the 3rd September 2024 there has been no further consideration or representation permitted by the public or the strategic planning committee, despite numerous requests to do so.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" within the HELAA Report November 2022. This site has never been either preferred or 2nd choice and was therefore NOT put forward for the Regulation 18 consultations. At the Strategic Planning Committee meeting on the 3rd September 2024, the site was 'recreated' as a result of sites Exmo_20a and Exmo_20b being put forward as allocated. The site Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022, and as of the 3rd September 2024 there has been no further consideration or representation permitted by the public or the strategic planning committee, despite numerous requests to do so.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with policy AR01(B). The proposed site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective, with the land often being waterlogged. Development on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, effectively defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary indicates that it may be available for other kinds of development. Therefore, the plan fails to robustly protect against adverse effects of recreational use etc in relation to the SSSI Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Show the 400m buffer zone on the maps associated with site Exmo_20.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with policy OL05. The main access point for this site (via the B3179) is between 4 and 4.3 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the residents of this development. The access arrangement for the site leads naturally down the B3179 into Budleigh Salterton High Street, but to get into Exmouth will mean travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, Dentists, schools, beach etc in Budleigh would be the most accessible and obvious choices for residents of this site. Currently Exmouth and Budleigh are separated in terms of functionality but this development would effectively merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with policy HE02 - this proposed site is a 'very large' development of between 700 to 1000 homes. The majority of these homes will surround the Grade II* listed St. John in the Wilderness Church and will have significant adverse effects on the remoteness and tranquillity that is so unique to this church, its surroundings and the churchyard. This development will drastically alter the peaceful and tranquil setting, not only for the congregation, but also the numerous visitors that come to pay their respect's to their relatives in the churchyard, but also to see the church and its setting.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the proposed housing development itself, with the 'majority/bulk' of this sites access being at the B3179, directly opposite the SPA/SAC/SSSI, would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Pebblebed Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by its remoteness, tranquillity, and the dark skies (especially when within the churchyard itself). This provides a 'wilderness' setting integral to the grade II* listed church which would be lost forever by having a housing development encircling it, regardless of any buffer zone being provided.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal for Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, which provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. This site also contains many long-established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and even if the developers promise that space can be left around them, degradation and fragmentation of habitat is unavoidable. The variety of wildlife that abound in these fields, trees and hedgerows will undoubtedly be affected by this development. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. The whole of the Exmo_20 site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the SSSI Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by this development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed site Exmo_20 is in conflict with paragraph 13.23. The whole of this site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network. It is part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of this site. The amount of wildlife that utilises this land and the nearby SSSI Pebblebed Heaths is diverse. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of this SPA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not take site Exmo_20 forward.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of a considerable amount of land that provides an abundance of biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (dated 30.01.25) confirms that there is “currently not sufficient certainty to rule out advert effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).” This site sits on the edge of the East Devon Pebblebed Heaths SAC/SPA, and with the proposed ‘majority/bulk’ of the traffic from this site going onto the B3179, the air quality will not be improved.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not take site Exmo_20 any further.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL09. The Habitats Regulations Assessment (dated 30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. With the ‘majority/bulk’ of the development being accessed via the B3179, this means that there will be a significant increase in traffic and emissions along the boundary of the Pebblebed Heath.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy PB01 and is not in accordance with the mitigation strategy. The number of houses being proposed at this site could be accommodated via alternative site(s) which would cause less or no harm to the SSSI Pebblebed Heaths (SAC/SPA).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal to allocate site Exmo_20 is in conflict with paragraph 2.6; The land proposed for development under Exmo_20 is currently open countryside, with a grade II * listed Church and churchyard at the middle of it. This is not a 'modest' development. It is a 'very large' development within a rural part of East Devon.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to the proposed access restrictions for this site, the development will generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring towns/villages using the B3179. The site slopes steeply downwards from North to South and is a remote location from infrastructure and services. Any walking or cycling routes provided with this site will provide limited viable alternative options, with most travelling been done via car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no (or limited) access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, which are already notorious for being congested and in need of improvement.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with paragraph 3.34: Although Exmouth is classed as a tier 1 settlement, it does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc., it will not add another Doctors surgery or Dentists surgery - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - numerous children already have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth cannot handle the current population, with sewage being discharged into the sea on a very regular basis, with 'closed for swimming' notices becoming a regular feature on our beach. Not a very good advertisement for a seaside tourist spot! Exmouth's sewerage problems have already been highlighted on national news several times.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with paragraph 11.2. There are two proposed access points for this site. One to be created at the South of the site via the existing Southern Wood cul-de-sac but only to accommodate 'modest' development, with the other access point being at the North of the site for the 'majority/bulk' of the development via the B3179. This will increase travel needs and necessitate cars to take longer routes for the majority (if not all) of the site. The main vehicular access point (B3179) is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in approximately 0.3 of a mile drive just to get from the site entrance to the housing. This would result in upwards of over 0.5 miles of 'on site' driving for most people every time they went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive between 4.0-4.3 miles to get into Exmouth centre. Exmo_20 is a large site and its positioning does not promote less travel, nor will it do anything to reduce traffic congestion in and out of Exmouth. This site is not sustainable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with policy TR01. No matter what the developers say, walking and/or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc. because the distances are too far. The studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, however, beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. If people live at the Northern part of this site, they will have to walk nearly 0.5 miles to get to the bottom of the site. Exmo_20 is by its position remote, and people will have to travel significantly further than 0.5 miles or even 1 mile to get to essential infrastructure and services. Based on this, walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will not alleviate the amount of car journeys this development would generate, especially taking into account the steep local topography and the distance people will have to travel to access essential infrastructure and services.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal of site Exmo_20 is in conflict with paragraph 11.6. This is a large development of between 700 to 1000 homes. The majority (if not all) of this site is NOT within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements. The topography of the site does not promote walking or cycling, especially not for shopping, doctors, dentists, school, etc.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not take Exmo_20 any further forward. Remove it from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 goes against policy SP01. The designated access point for the 'bulk' of the development on this site (via the B3179) is over 4 miles by car from Exmouth town centre yet just over 2 miles from Budleigh Salterton town centre. How can this be considered to be a development in Exmouth. Exmouth cannot take any further development, we have the sea to the south, the estuary on the west and the SSSI (Pebblebed Heaths) to the east. The only option is to develop on the North side which is totally unsuitable for further significant growth. Any new development is closer to neighbouring towns & villages and therefore not a development at the principal centre of Exmouth. Development of Exmo_20 is unsustainable due to its distance from Exmouth town and any services/facilities.

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.: Stop promoting Exmo_20 as a viable development, and stop pushing more and more development on to a town that has massive infrastructure issues without adding to them.

Full name: Chrissie Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: /////
PART 3 - CONTINUED FROM PART 2 6825b902d0807f0013c3842e /////

There are some hedgerow boundaries with some mature trees. The views from the site are open and exposed, including long distance views. Easterly parts of site are remote from services and facilities and if developed would form a quite large 'tongue of development' projecting into open countryside with visual impacts on areas of open countryside and designated AONB. The site itself is not in the AONB. If site 10 can be rejected for development for these reasons, then so should site 17, which is in the AONB, has better views and quality land, and can be seen from the South West Coast Path. Historic Littleham has a long significant history and is older than Exmouth. It was a Saxon subdivision with its own court and was retained by the Kings of Wessex until the 11th Century when it was given by Edward the Confessor to his Master Ordgar, who then passed it onto the Monastery (Horton in Dorset 970 AD) who held it until the Dissolution of the Monasteries, before descending into the Rolle Family and Lord Clinton. The area has historically been forested and agricultural and used by local Farms including Liverton and Woodlands, once part of the Manor of the Wade in the 1300s. The Drake family are also well linked to the area, having lived at the now Prattshayes in the village, funded the Drake Aisle in the church and being buried there. It's mentioned in the Domesday record of 1086. Over the years the Village has grown and changed. The only area that has relatively unchanged (apart from some former buildings and railway line) is the area that borders Littleham including site 17 with its long agricultural history. On the proposed plan, very little detail is given regarding the local listed church compared to other sites that have been rejected such as site 07 in Exmouth, Bystock Court, which is grade 2 listed. St Margaret's and St Andrews Church, which borders the site is grade 2* which carries much more of a historical significance. Nowhere does the plan mention its grade 2* status. All the plan states is that there is a listed Church to west of site and is of prominence in views and setting for southerly parts of the site as much of the site is remote from church. The site is not remote from the church. The church forms

part of the special distinctive village and rural country feel of the whole site and is a significant heritage asset and has a direct impact on potential scope for accommodating residential development. To have an intensification of urban activity and vehicle movements, could adversely impact on heritage value as could other aspects of urbanisation. One example would be the potential over use of the public access through the churchyard, from site 17 to Littleham Road, south of the site. On the proposed plan it also states that there are no other identified designated heritage features that would impact on site. However, when looking the Historic Environment Records (HERS) there are multiple HER Monuments. The first being that Littleham is the bounds of the original Saxon Manor (MDV41872). The current parish boundaries are unchanged since Edward the Confessor or possibly earlier and the site has always been rural. Others include the 19th Century churchyard (MDV112441); the Exmouth to Budleigh Salterton Branch line Railway (MDV22498); Pond to the East of Capel Lane shown on previous maps including the Littleham Tithe Map of 1844 and is on current OS and Google maps (MDV111969); Extraction Pits on northern part of the site, of probable Post Medieval to Modern Earthwork Pit on aerial photos of 1950 onwards and LiDAR 1998-2012 (MDV106427 and MDV106428); Extraction Pit to the South East of probable Post Medieval to Modern and is visible as an earthwork pit on aerial photos 1946 onwards and on digital LiDAR images 1998-2012 (MDV196331); Pond to the South of Salterton Road on Tithe Map of 1844 and OS Maps (MDV111967); Extraction Pit to the Northwest (MDV106423); possible field boundary to south of Liverton Business Park. Potential Medieval to Post Medieval and visible as a two Cropmark Bank on aerial photos in 1969 (MDV106429); possible Early Medieval to Post Medieval field boundary to the south. Visible as a cropmark ditch on aerial photos in 1969; Orchard Banks to the North of St Margaret's and St Andrew's Church, Littleham. Orchard is likely Post Medieval to Modern. Linear earthwork banks on aerial photos 1946 onwards and digital images taken in 2010 (MDV106422); Earthwork Pit to the north of St Margaret and St Andrews Church, Littleham. Probable Medieval to Post Medieval in origin and is visible on aerial photographs 1950 onwards and LiDAR images 1998-2012. This could possibly be the former Manor House built in the 15th Century and known as The Lords House; and Buildings to the East of Capel Lane (MDV111334). Local to the site are several other listed buildings. These are the Lichfield Gate to the churchyard (grade 2) near the bottom of Littleham road and 1-5 Castle Cottages (grade 2 and HER Monument (MDV51057) which are visible from the site and near potential access to the site. Further away in the village are, Littleham Tithe Barn (grade 2), Mundy's Farm and cottage (grade 2), Green Farm (grade 2) Prattshayes Farm (grade 2) and 2 sets of Gate piers and iron gates at Prattshayes. The churchyard which borders the site contains several prominent resting places including the tomb of Lady Nelson as well as war graves. Littleham Village on the current neighbourhood plan is a potential site for a new conservation area, which it deserves to be. Ecological In the NPPF paragraph 174, planning polices, and decisions should contribute to and enhance natural and local

environment by protecting and enhancing valued landscapes and sites of biodiversity; recognise intrinsic character and beauty of the countryside and its wider benefits. The site is seen as being favourable from an ecological perspective on the proposed plan. However, many ecological considerations have not been considered. AONB positively enhance their beneficial use, provide access and opportunities for recreation, as well as retain and enhance the landscapes visual amenity and biodiversity. The site may not be part of the Pebblebed Heaths on Woodbury Common, but the site does act as a wildlife corridor towards this and is in the AONB. From site 17, you can access Woodbury Common, which is not far away for wildlife. Site 17 is also near World of Country life, that promotes the local habitat for bees and other insects. Also at night site 17, does not suffer from artificial light pollution, which helps to support our nocturnal wildlife. Paragraph 176 in the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONB which have the highest level of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and are given great weight to avoid or minimise adverse impacts on designated areas. There are many local features of interest, notably mature hedgerows, and trees, including Oak trees, which help support the local wildlife. The site is near local woodland and the bordering churchyard offers a biodiversity of local flora and fauna including a habitat for butterflies, birds, bats, and other insects. In certain parts of the churchyard, the grass is not cut to help provide biodiversity. The churchyard also contains a natural burial ground which backs onto site 17. On first looks of site 17, agricultural fields are seen, but on further inspection, the site offers a well-known wildlife habitat for various species including bats, various birds including Green Woodpeckers, badgers, deer, dormice, adders, rare wood crickets, butterflies, dragonflies, and plants. This is signposted on the information boards along the cycle path and walkway that runs through site 17. To develop this site would have a vast detrimental affect on the local wildlife that would permanently destroy their habitats. NPPF paragraph 180 when determining planning applications consider if significant harm to a biodiversity resulting from development cannot be avoided, adequately mitigated, or compensated for it should be refused. This is further supported by the Governments 25-year Environment Plan which sets out goals for improving the environment within a generation and leaving it in a better state. Also, the current landowner of site 17, Devon Clinton Estates on their website states the following: “Doing today what is right for tomorrow”; “By handing on the land to future generations in a better condition”; “By investing in the local community” and “Everything we do is with tomorrow in Mind”. To continue these principles, site 17 should not be developed. The site should be protected from development and the local wildlife habitats and landscape saved for future generations. It is also important to recognise that (P35 paragraph 120b of the NPPF) when making effective use of land, some undeveloped land can perform many functions such as wildlife, recreation, flood risk mitigation,

carbon storage and food production. The East Devon AONB Support farming in the AONB to help protect habitats, species and support local communities in sustainable farming. Over 90 percent of the UK population live in areas where local government has declared a climate emergency. With native species and habitats in decline like never before, AONB partnerships have made a formal commitment of their own to increase scale and pace of delivery of nature in form of the Colchester declaration. Accessibility on the proposed plan it is stated that parts of site fall within 1600m of facilities; parts of the site are close to a frequent bus service and that Littleham village is to the south of the site with an industrial estate to the north, though it is across a busy main road. There is no mention that site 17 is outside the town boundary and is one of the furthest sites away from the town centre. The closest bus service predominantly only covers Exmouth. Buses to Sidmouth are infrequent and to go to Exeter, the best option is to catch the 57 buses from Littleham Cross, which is at least a 25-minute walk away from the closest part of the site. The closest supermarket would more than 1600 metres from the mid to furthest part of the site. There are no shops in Littleham Village and the only amenities are the pub and tearoom. The local primary school on the furthest part of the site would unlikely be in walking distance. The only secondary school is most definitely not in walking distance and the local bus does not go near the secondary school. The secondary school is in cycle distance along the cycle path after Littleham Cross but may not be suitable after dark due to it backing onto gardens from both sides with limited street lighting. The local train station is in the town centre, which is a lot further than 1600 metres from the closest site and would be at least a 60-minute walk. There is no pathway along Castle Lane and no pathway directly outside the site on Salterton Road. The main accessibility along the site is from the cycle path and walkway. Traffic through Littleham can be busy when Devon Cliffs and World of Country life are open. Most employment opportunities are in Exeter, and there are only 2 main roads out of Exmouth due to its location, which are already struggling with excess traffic and will only worsen with more development. Site Constraints on the proposed plan it states that there are no significant site constraints, but there would be expected local constraining within the site due to its size. I disagree with this. This site does have significant site constraints. Firstly, the sites ecological value to the local habitat and wildlife which would be permanently destroyed if development was to go ahead. Secondly the green infrastructure of the former railway line which is now part of the well-established cycle path and walkway. It forms part of the National Cycle Network (Sustrans) NCN2 from Dover to St Austell and the international Tour de Manche between Plymouth and Poole. This is a valued form of green infrastructure valued by not only the local community, but further afield as well. There are 9 design principles to be on the Sustrans including its attraction and enhanced ecological features as well as being safe and accessible traffic free paths. Its currently a free to use and safe path for cyclists and walkers of all ages and accessibility needs, with no risk of potential harm from vehicles. It also helps to support both health and wellbeing of the community,

deliver wider benefits for nature and support efforts to address climate change (an issue raised in the NPPF, p27 paragraph 92c and p28 paragraph 98). This could easily be lost through development due to having to meet set criteria. Paragraph 100 p29 of the NPPF, discusses that planning policies and decisions should protect and enhance public rights of way including current access links to national trails. The site is bordered by both a busy road and 2 lanes, which would struggle to cope with increased traffic as well as adding to increase both environment and noise pollution. There are very limited foot pathways with none on Castle Lane (and unlikely to be) and none outside the site on the busy B3178 (Salterton Road). The only lane that has footpaths is Capel Lane, although not along its full length. The site sits within the local AONB and is outside the BUAB which is on the neighbourhood plan. Within site 17 there are mature hedgerows and trees including Oak, with 2 trees having a TPO. North of the site is the SWW underground reservoir with evidence of possible private piping near this on the site. Devon Air Ambulance are also known to use part of the site to land the helicopter in an emergency for this side of Exmouth. The site also contains multiple HERs and borders the local grade 2* church and its surrounding 12-acre churchyard. Inappropriate development in green belt land including AONBs is treated as being harmful and in paragraph 144 of the National Planning Policy Framework (NPPF) paragraph 172, is a reason for refusal in general development control in AONBs. The Exmouth Neighbourhood Plan argues against any development outside the current BUAB due to the amount of housing development within Exmouth without any provision to improve local infrastructure and does not support any development outside of the BUAB. According to the National Flood and Coastal Erosion Risk Management strategy for England and the South West River Basin Direct Flood Risk Management Plan 2021 to 2027 (December 2022 by the Environment Agency), Littleham is in a flood risk area (FRA). Due to its location, Littleham and parts of site 17 are at risk of fluvial flooding from the Littleham Brook, surface water flooding from runoff and flooding from the drainage network due to the inability of the sewage network to cope during high rainfall and tidal locking. All forms of flooding impact on the local area including the environment, listed buildings, homes and businesses. Littleham, as per the government website, is currently a high-risk area of surface water flooding. Littleham and part of site 17 is in a high-risk fluvial flood zone, which is greater than 3.3% Annual Exceedance Probability (AEP) and not flood zone 2 which is 0.1% AEP on the current draft plan. Within Littleham village there is a history of flooding from the Littleham Brook and surface water runoff from Castle Lane and the Devon Cliffs access road to the south. Replacement of the road culvert has alleviated much of this flooding, but there is still surface flooding in Maer Lane. Due to the area becoming more urbanised, resulting in more surface water runoff and the aging drainage infrastructure there is an increase in risk level. This will only worsen with more development and climate change. Rainfall intensity is expected to increase in the future and cause higher river flows and levels with rapid run off from upper catchments and more flooding. The middle part of

Littleham Brook flows through an urban area which will see an increase in flood frequency and impacts. This is also partly due to the limited scope to increase the capacity of the structures that cross the Littleham Brook which may further constrict flow. Tide locking of the outfall of Littleham Brook into the sea will also occur more frequently due to sea level rise. It is also expected to frequently overload the aging sewage network, placing a greater reliance on pumped systems to disperse the drainage and an increase in pollution. Flooding is also discussed in the NPPF chapter 14 that inappropriate development in areas at risk of flooding should be avoided by directing development from higher risk areas, so as not to increase flood risk elsewhere. All plans should apply a sequential risk-based approach to location of development and consider all sources of flood risk both now and in the future and to safeguard land from development that may be required for future flood management. Site Opportunities Site 17 on the proposed plan is stated as being a large-scale site, that if it is allocated for development as a whole or just parts, it would be expected that a mixed-use development could deliver a range of positive outcomes. I disagree with this. The site is currently used for farming, which is vital if we are to become sustainable. Also, with the closer proximity to Exeter, most employment opportunities are in Exeter, which has better links to other areas of the country compared to Exmouth. The site sits outside of the BUAP and is further away from the town centre. Site 18 in Exmouth, which is land directly to east of Liverton Business Park and is close to site 17, is for employment allocation. Liverton business park tends to have smaller businesses that have lower employment numbers of staff required locally except for 3 businesses. There is currently no need for the site 17 to be developed for other employment uses and would be far better to be kept for farming, where there is a need. Paragraph 177 in the NPPF states when considering applications for development within National Parks, the Broads and AONB permissions should be refused for major development, other than in exceptional circumstances where it can be demonstrated that the development is in the best public interest. Consideration of the following (a) need for development including in terms of any national considerations and the impact of permitting it or refusing it upon local economy; (b) cost of and scope for developing outside designated area, or meeting need for it in some other way; (c) any detrimental effect on environment, landscape and recreational opportunities and extent to which it could be mandated. Footnote 60 p51. For the purposes of paragraphs 176 and 177, whether a proposal is a 'major development' is a matter for the decision maker, considering its natural scale and setting and whether it could have a significant adverse impact in the purposes for which the areas has been designated or defined. There is no clear definition of a major development, but in the NPPF glossary, it is described as a site of more than 10 houses or a site bigger than 0.5 hectares. For site 17, I would consider this as being a major development in the AONB. The housing that is needed in Exmouth is affordable housing for the local community, rather than new houses on the open market (this is supported by NPPF paragraph 78 p21). Brown field sites not allocated for housing, could be used

as Entry level exception sites for first time buyers and those looking to rent their first home. Entry level exception sites are not permitted in AONB and green belt areas (p19 paragraph 72b of the National Planning Policy Framework, 2021). As large-scale developments tend to have very little affordable housing, I can only imagine developers using this to their advantage and limiting the number of affordable homes and instead build unwanted expensive houses that the community does not need and cause a major destruction of the AONB. Paragraph 73 p20 of the NPPF, describes larger scale development as significant extensions to existing villages and towns, that need to be well allocated and designed and supported by necessary infrastructure and facilities including a genuine choice of transport modes, economic potential, and scope for net environmental gains. Also, when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre (NPPF paragraph 88 p25). Site 17 sits outside of the BUAB with poor road infrastructure both locally and outside of Exmouth. Public transport is poor in this area and the site is not well served by local amenities. In the healthcare sector, emergency health care and Gp practices are struggling and there are long waiting lists to join an NHS dentist. There is only 1 local Acute Hospital in Exeter. Due to location of site 17 in the AONB, the opportunity is there for further environmental net gains, provided it is kept free of development such as building on the current biodiversity and habitat protection the site offers. An economic potential is to retain the cycle path and walkway, which also supports green tourism and maintain the rest of the site for agricultural use. This helps to support sustainability and the health and wellbeing of the community. I agree that the whole, the site would be a poor choice for allocation of development, even if only a part of it was developed. Even sites 9 and 15 are considered major development within the AONB, as in appendix 2 in the NPPF a development of more the 10 houses or the site is 0.5 hectares, or more is seen as a major development. Also, the chances are high that any potential housing would be unaffordable for the local community. With the government housing target numbers relaxing and considering the existing character and density of Exmouth, it is a great time to review the housing requirements for Exmouth. The site sits within open countryside inside the AONB and is outside of the BUAB. The site offers far reaching views and feels separate from the urban sprawl of Exmouth. The site has a local intrinsic value that is enjoyed by both the local community and those from further afield. The site has an already established green infrastructure that is enjoyed by those of all ages and abilities and is part of the well-known National Cycle Network and is a viable habitat for the various local wildlife and not of low ecological value as stated in the proposed plan. This would be permanently destroyed with development. The site also borders the grade 2* village church, which is a significant heritage asset and development of the site could have a significant detrimental effect on both the church and the surrounding graveyard and its biodiversity. There are also other grade 2 listed buildings near by as well as HERs. For employment reasons, the site is currently used as agricultural land, which it has been

for many years. To be sustainable, we need our farmland, so we can try to be more carbon neutral and support local farm businesses. If this site was developed, this would be lost forever. The site if developed, would raise significant issues about suitability and desirability of accommodating a major large-scale development in the AONB. The NPPF discusses sustainable development for plan making, and the application of policies in this framework seek to protect areas or assets of particular importance and provides strong reason for restricting overall scale or type of development or destruction of landscape in AONB. The effects of pollution on health, living conditions, natural environment as well as the potential sensitivity of the site that could occur from development should be identified. This includes both air quality, light pollution, and excess noise from traffic. Rejecting site 17 for development will help to protect this tranquil area which has remained relatively undisturbed by noise and pollution. The site is currently prized for its recreational and amenity value including the current habitat and biodiversity; the dark landscape at night, which can aid nature conservation and the cycle path and walkway. To develop site 17 would only lead to increase in noise, pollution and destruction of the local wildlife habitats and amenity value including the health and wellbeing of the community. Also, the site prevents the urban sprawl of Exmouth encroaching further into the much-needed countryside. In November 2022 Historic England and National Landscapes signed joint statement to manage, conserve and celebrate our iconic historic environment. This helps set a precedent on the value that National Landscapes can offer not only the local community, but nationally as well. Too much land designated in the National Landscapes has been lost to development nationally and now the government would like to increase the number of National Landscapes. Site 17 location carries a significantly high amenity value compared to sites that are not in the National Landscapes or near conservation areas. It is a both wildlife corridor for this side of Exmouth and a link to the proposed Mear Valley Park. With the policies regarding the National Landscape and the NPPF, development should not be considered if in conflict with neighbourhood plans. Site 17 being outside of the BUAB is not supported on the neighbourhood plan. Many sites with similar characteristics to site 17 have been rejected, with the issues raised considered significant enough to reject other sites given less weighting for site Exmouth 17. For example, Exmouth site 07 has been rejected due to its proximity to a Grade 2 listed building, but this reasoning has not been applied to Exmouth site 17 which borders the more significant higher graded Grade 2* Church in Littleham. Other examples are as follows: Broadhembury 07, reasons for rejection include high landscape value as it lies within the AONB, and impact on local listed buildings, reasons which are also true for Exmouth 17. Budleigh Salterton 05, reasons for rejection include the existing field forms being an attractive feature and development could affect the setting of designated and non-designated heritage assets. These reasons equally apply to Exmouth site 17 but have not been included in the plan. Chardstock 01, reasons for rejection include being in a National Landscape and having high landscape sensitivity. Both reasons apply to

Exmouth site 17. Confusingly, another reason for rejection is that the site is bordered by agricultural fields despite local residential development providing some context of built form. Whereas this is reasoning is turned upside down for Exmouth 17, where the local residential development providing some context for development is used as a benefit for development. The argument cannot be used both ways. Clyst St Mary – Sowton 01, reasons for rejection include development affecting the special character of local listed heritage assets. A reason which holds true for Exmouth site 17. Clyst St Mary – Sowton 02, reasons for rejection include having a high landscape sensitivity to new development, a reason which holds true for Exmouth site 17. East Budleigh 01, reasons for rejection include location of the site within the AONB and the effect of development on local heritage assets. Reasons which are also true for Exmouth site 17. Exmouth 10/24, reasons for rejection include the open and exposed nature of the site in terms of landscape and its rural rather than urban fringe character. This site is particularly noteworthy since it is located on the opposite side of the B3178 (Salterton Road) from Exmouth site 17. These characteristics apply equally to Exmouth site 17, therefore Exmouth site 17 should be rejected since in addition to its open landscape and rural character, also lies within the AONB. Hawkchurch 02, reason for rejection being the rural, agricultural character of the site, a characteristic shared with Exmouth site 17, despite Hawk 01 being outside the AONB. Honiton 04, reason for rejection being development would have a high landscape impact and the site being within the AONB. Both being reasons against development within Exmouth site 17. Honiton 09, reason for rejection being the site falling within the AONB and having a high impact on the landscape. Despite the site being located next to a major A30 junction and sandwiched between the A30 and Langford Road. Surely the landscape impact of development within Exmouth site 17 must be greater. Honiton 12, reason for rejection being the impact of development on landscape and heritage due its location within the AONB and the adjoining grade 2* church. This is the same situation as Exmouth site 17. Therefore, surely Exmouth site 17 must be rejected for the same reason. There are many other examples of this inconsistent approach to assessing the development potential of Exmouth site 17, which are too numerous to detail here. It is apparent that only the benefits of the development of Exmouth site 17 have been considered any negative impacts glossed over by the plan as it stands. Prior to adoption of the plan, Exmouth 17 must be reassessed as it does not appear that a full assessment of the site has been conducted. A full assessment of the benefits and negative impacts of development within Exmouth site 17 could only conclude that the site be rejected for development within the East Devon Local Plan. This is an area the size of 4 football fields that stretches from opposite McDonalds right down to Castle Lane with industrial units next to Salterton Road plus 410-450 houses. There would be one access road with one exit onto Salterton Road. The access road would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe, alongside many in our community, that our natural beauty should be preserved. EDDC has a legal duty to

'conserve and enhance' National Landscape and I want to stop the loss of our precious space and natural beauty. I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17. Both EDDC and DCC are expected to be clearly demonstrate that they have considered the purposes of the National Landscape designation in their decision making.

Full name: Chrissie Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: /////
PART 2 - CONTINUED FROM PART 1 6814dd4705e4ad001300b9e9 /////

The duty is intended to complement these requirements by ensuring that the purposes for which Protected Landscapes are designated for are recognised in reaching decisions and undertaking activities that impact these areas. Consideration of what is reasonable and proportionate in the context of fulfilling the duty is decided by the relevant authority and should take account of the context of the specific function being exercised. Relevant authorities will need to apply the duty when undertaking any function in relation to, or so as to affect, land in a Protected Landscape. This may include the preparation of Development Plans and associated assessments and documents and decision making in respect of development management, planning applications and nationally significant infrastructure projects, functions outside of a Protected Landscape which may have an effect on land in a Protected Landscape. When seeking to further the purposes, relevant authorities should consider the information contained in a Protected Landscape's Management Plan. Management Plans describe the natural beauty, special qualities and key characteristics of and targets and objectives for the designation. Relevant authorities should make efforts to understand the Management Plan and relate their functions to it. Dialogue with the Protected Landscape team (National Park Authority, Conservation Board, National Landscape Partnership, or Joint Advisory Committee) can assist the relevant authority. A relevant authority should take appropriate, reasonable, and proportionate steps to explore measures which further the statutory purposes of Protected Landscapes. As far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes. A relevant authority should be able to demonstrate with proportionate, reasoned, and documented evidence the measures to which consideration has been given when seeking to further the statutory purposes of Protected Landscapes - for example, policies, strategies, operational

procedures, estate management plans, investment plans, contracts, works instructions, assessments and reports which should be able to evidence the proper discharge of the duty by the relevant authority. For development plan making and development management decisions affecting a Protected Landscape, a relevant authority should seek to further the purposes of the Protected Landscape - in so doing, the relevant authority should consider whether such measures can be embedded in the design of plans and proposals, where reasonably practical and operationally feasible. For the development and management of land, water and estates, relevant authorities should seek to further the purposes of the Protected Landscape when designing and undertaking these activities, where reasonably practical and operationally feasible. What are the statutory purposes that you should seek to further when exercising a function in the Protected Landscape it affects? Do measures which would further the purposes align with and help to deliver the targets and objectives in the Protected Landscape's Management Plan? Are such measures appropriate and proportionate to the type and scale of the function and its implications for the area? For instance, are measures in keeping with the natural beauty, the special qualities and key characteristics of the Protected Landscape? Could the measures contribute to the conservation and enhancement of the Protected Landscape's wildlife, ecological value and quality, geological and physiographical features, water environment, cultural heritage, dark skies, tranquillity, opportunities for access to nature, and landscape character for which the area was designated? Has the relevant Protected Landscape team been approached for their views on whether or not measures help to deliver the Protected Landscape's Management Plan and further the purposes of the designation? Public authorities must also comply with the strengthened Biodiversity Duty that the Environment Act 2021 introduced. You should consider how your actions taken to comply with the Biodiversity Duty are complementary and if you have met both duties in full through your decision. The statutory purposes of National Landscapes (areas of outstanding natural beauty) are conserving and enhancing the natural beauty of the area of outstanding natural beauty. The statutory purposes of National Landscapes (areas of outstanding natural beauty) with Conservation Boards are conserving and enhancing the natural beauty of the area of outstanding natural beauty and increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty. The Management Plan describes the natural beauty, special qualities and key characteristics of a Protected Landscape. This will articulate the features of the landscape which warrant its nationally designated and protected status. The duty also applies to functions undertaken outside of the designation boundary which affects land within the Protected Landscape. Natural beauty, special qualities, and key characteristics can be highly dependent on the contribution provided by the setting of a Protected Landscape. Aspects such as tranquillity, dark skies, a sense of remoteness, wildness, cultural heritage or long views from and into the Protected Landscape may draw upon the landscape character and quality of the setting.

Functional connectivity is also important where there are flows or close interconnection between the Protected Landscape and its setting, for example a shared water catchment and management of water resources; ecological connectivity where species are able to move across and between the designated and non-designated area; Rights of Way, Open Access Land and other recreational links joining the designated area to the wider countryside. Development and the management of land, water and estates located in the setting have the potential to adversely affect the natural beauty, special qualities, and key characteristics of a Protected Landscape. On 21st March 2025 it was published a meeting of major landowners to boost nature's recovery to discuss land management plans to meet the country's legal Environmental Act targets (Department for Environment Food and Rural Affairs and The Rt Hon Steve Reed OBE MP). It is part of Government's commitment to transform how we use land in this country to protect the environment, support economic growth and deliver on our Plan for Change. It will play a pivotal role in supporting the Government's ambitious environmental goals, including statutory targets in the Environment Act and our commitment to protect 30% of land by 2030. With the natural world facing species decline and a biodiversity crisis, Reed called on the group for action to collectively protect and restore nature on their estates across England. Landowners must go further and faster to restore our natural world. The 'National Estate for Nature', who manage a tenth of the land in this country, have a responsibility to future generations to leave the environment in a better state. We have a unique opportunity to work together on common sense changes that create a win-win for nature, the economy, and make the best use of the land around us. Tony Juniper, Chair of Natural England talked of if we are to reverse the historic declines in nature, we must take urgent action at every level to restore nature on the ground. This group is an important first step in securing a strong commitments from landowners across the country to collaborate on managing land in a more sustainable way, for the benefit of both people and nature. We need work together to find the long-term solutions for key challenges, such as the demand for new homes and infrastructure, and the need to halt long-term biodiversity loss and recover nature. Harry Bowell, Director of Land and Nature at the National Trust said as the Government's Land Use Framework makes clear, a transformation in the use of land is needed if we are to meet our nature and climate targets. Only by working together will be able to restore our landscapes at the scale needed to put nature in recovery by 2030, lock up enough carbon in the English countryside to reduce greenhouse gas emissions to required levels, and prepare for the worsening impacts of climate change. We are committed to playing our part. It represents institutions with significant holdings across the country, and associated significant potential to drive nature's recovery, a vital part of the government's national conversation about land use ahead of publishing a Land Use Framework in 2025. The broad representation also ensures that the group can draw on a wealth of expertise and experience in land management, conservation, and sustainable development, enabling them to develop and implement effective strategies for nature recovery, sustainable

land use, and environmental protection. Defra will actively participate as a member, leading by example and supporting the group with guidance, resources, and coordination as they work toward meeting the Government's environmental targets. Further quarterly meetings will focus on developing and implementing agreed on-the-ground plans to drive nature's recovery. This comes following the introduction of new measures to strengthen our protected areas and meet 30by30 that show this government is committed to delivering for nature. As part of the government's Environmental Improvement Plan (EIP), everyone, from land managers to homeowners, has a crucial role to play in restoring the natural environment. 'Protected Landscapes' refers to National Parks, the Norfolk and Suffolk Broads and National Landscapes in England. 'National Landscapes' is the rebranded name for areas of outstanding natural beauty (AONBs). The Protected Landscapes duty is intended to operate and provides broad principles to guide relevant authorities in complying with it. Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA) amends the duty on relevant authorities in respect of their functions which affect land in National Parks, National Landscapes, and the Norfolk and Suffolk Broads (collectively referred to as Protected Landscapes) in England. Relevant authorities must now 'seek to further' the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purposes. The duty is intended to facilitate better outcomes for England's Protected Landscapes, which are in line with their statutory purposes. The duty does not prevent relevant authorities from undertaking their statutory functions and discharging their legal duties and other responsibilities. The duty is intended to complement these requirements by ensuring that the purposes for which Protected Landscapes are designated for are recognised in reaching decisions and undertaking activities that impact these areas. Consideration of what is reasonable and proportionate in the context of fulfilling the duty is decided by the relevant authority and should take account of the context of the specific function being exercised. Relevant authorities will need to apply the duty when undertaking any function in relation to, or so as to affect, land in a Protected Landscape. The preparation of Development Plans and associated assessments and documents; decision making in respect of development management, planning applications and nationally significant infrastructure projects; functions outside of a Protected Landscape which may have an effect on land in a Protected Landscape; the drafting of Protected Landscape Management Plans; planning appeals and public inquiries; the drafting of Local Nature Recovery Strategies; other plans such as Neighbourhood Plans. When seeking to further the purposes, relevant authorities should consider the information contained in a Protected Landscape's Management Plan. Management Plans describe the natural beauty, special qualities and key characteristics of and targets and objectives for the designation. Relevant authorities should make efforts to understand the Management Plan and relate their functions to it. Dialogue with the Protected Landscape team (National Park Authority, Conservation Board, National Landscape Partnership, or Joint

Advisory Committee) can assist the relevant authority. Relevant authorities should also refer to the Protected Landscapes Targets and Outcomes Framework. A relevant authority should take appropriate, reasonable, and proportionate steps to explore measures which further the statutory purposes of Protected Landscapes. As far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes. A relevant authority should be able to demonstrate with proportionate, reasoned, and documented evidence the measures to which consideration has been given when seeking to further the statutory purposes of Protected Landscapes - for example, policies, strategies, operational procedures, estate management plans, investment plans, contracts, works instructions, assessments and reports which should be able to evidence the proper discharge of the duty by the relevant authority. For development plan making and development management decisions affecting a Protected Landscape, a relevant authority should seek to further the purposes of the Protected Landscape - in so doing, the relevant authority should consider whether such measures can be embedded in the design of plans and proposals, where reasonably practical and operationally feasible. For the development and management of land, water and estates, relevant authorities should seek to further the purposes of the Protected Landscape when designing and undertaking these activities, where reasonably practical and operationally feasible. What are the statutory purposes that you should seek to further when exercising a function in the Protected Landscape it affects? Do measures which would further the purposes align with and help to deliver the targets and objectives in the Protected Landscape's Management Plan? Are such measures appropriate and proportionate to the type and scale of the function and its implications for the area? For instance, are measures in keeping with the natural beauty, the special qualities and key characteristics of the Protected Landscape? Could the measures contribute to the conservation and enhancement of the Protected Landscape's wildlife, ecological value and quality, geological and physiographical features, water environment, cultural heritage, dark skies, tranquillity, opportunities for access to nature, and landscape character for which the area was designated? Are there ongoing management needs for these measures? How will the measures be funded and secured? Has the relevant Protected Landscape team been approached for their views on whether or not measures help to deliver the Protected Landscape's Management Plan and further the purposes of the designation? Public authorities must also comply with the strengthened Biodiversity Duty that the Environment Act 2021 introduced. You should consider how your actions taken to comply with the Biodiversity Duty are complementary and if you have met both duties in full through your decisions. The statutory purposes of National Landscapes (areas of outstanding natural beauty) are:

- conserving and enhancing the natural beauty of the area of outstanding natural beauty The statutory purposes of National Landscapes (areas of outstanding natural beauty) with Conservation Boards are:
- conserving and enhancing the natural beauty of the area of outstanding natural beauty
- increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty The Management Plan describes the natural beauty, special qualities and key characteristics of a Protected Landscape. This will articulate the features of the landscape which warrant its nationally designated and protected status. The duty also applies to functions undertaken outside of the designation boundary which affects land within the Protected Landscape. Natural beauty, special qualities, and key characteristics can be highly dependent on the contribution provided by the setting of a Protected Landscape. Aspects such as tranquillity, dark skies, a sense of remoteness, wildness, cultural heritage or long views from and into the Protected Landscape may draw upon the landscape character and quality of the setting. Functional connectivity is also important where there are flows or close interconnection between the Protected Landscape and its setting, for example:
 - a shared water catchment and management of water resources
 - ecological connectivity where species are able to move across and between the designated and non-designated area
 - Rights of Way, Open Access Land and other recreational links joining the designated area to the wider countryside Development and the management of land, water and estates located in the setting have the potential to adversely affect the natural beauty, special qualities, and key characteristics of a Protected Landscape.

Response from the National Landscapes Association to the consultation from Ministry of Housing, Communities and Local Government: Proposed reforms to the National Planning Policy Framework and other changes to the planning system September 24

Contact: Ruth Larbey, Policy and Advocacy Manager (ruth.larbey@national-landscapes.org.uk)

The National Landscapes Association (NLA) is a registered charity that supports the mission to conserve and enhance natural beauty in National Landscapes and other protected areas. One of our key aims is to support and develop a network of ambitious National Landscape teams and partnerships that have a strong collective voice and a

positive impact on the places for which they care. This consultation response has been developed by the National Landscapes Association in collaboration with the Planning and Placemaking specialist panel of representatives from across the National Landscapes network.

National Landscapes Association acknowledges the Government's aspiration to build 1.5 million homes over the next five years. Our response to the September 2024 consultation on the National Planning Policy Framework (NPPF) is intended to help ensure that this is done in a way that delivers the right homes in the right places. National Landscapes are areas whose natural beauty is so outstanding that it is in the nation's interest to safeguard them. They are also living and working environments that need to help mitigate and adapt to the impacts of climate change. As such, we recognise that some degree of development may be appropriate in these areas in order to sustain vibrant and thriving local communities and to achieve net zero. This development should be delivered in a way that is compatible with and, ideally, positively contributes to the statutory purpose of conserving and enhancing the natural beauty of these areas.

We support the Government's statement that 'existing protections for land covered by existing designations will be maintained'.¹ However, the proposed reforms would set an expectation for a quantum of housing development, in local authority areas that overlap with National Landscapes, that is likely to result in significant harm to the natural beauty of our National Landscapes. As such, the reforms would conflict with the statutory purpose of conserving and enhancing this natural beauty. The reforms would also conflict with the statutory duty to seek to further this purpose (the 'seek to further' duty).² Therefore, we consider that the proposed reforms would not be legally compliant in this regard.

We believe that the Government's aspiration to build 1.5 million homes over the next five years can be delivered in a way that would be less harmful to the natural beauty of our National Landscapes than would be the case with the proposed reforms. In particular, we recommend that:

- the standard method for calculating housing need should: (i) maintain an urban uplift (with amendments to the current urban uplift calculation); and (ii) reduce the extent to which 'affordability' is factored in (at least compared to the proposed reforms);

- the NPPF should make more explicit reference, including in paragraphs 35(a) and 61, to the fact that there may be circumstances where the protection afforded to areas or assets of particular importance, including National Landscapes, may mean that objectively assessed needs cannot be met in full.

The reduction in the extent to which affordability is factored into the standard method could be balanced by maintaining an urban uplift, thereby still achieving the target of 1.5 million homes over five years (an average of 300,000 homes per annum). The National Landscapes Association supports the national aspirations to achieve ‘net zero’. However, we are concerned about the proposed wording at the start of paragraph 164, which states that ‘local planning authorities should support planning applications for all forms of renewable and low energy development’. This wording could give the impression that all proposals for renewable and low carbon energy should be permitted. This should not be the case, particularly in National Landscapes and their settings, where such proposals, particularly large-scale schemes, could potentially conflict with the statutory purpose of conserving and enhancing natural beauty and with the ‘seek to further’ duty. We recommend that the proposed wording at the start of paragraph 164 should be caveated to make it clear that the impacts of such proposals still need to be addressed as part of the decision-making process, including in the overall planning balance. As indicated above, we support the fact that the Government is maintaining (i.e. not weakening) the protection afforded to land covered by existing designations. However, with regards to National Landscapes, we consider that it would be appropriate to strengthen this protection, rather than just maintaining it. For example, we recommend that paragraphs 182 and 183 of the NPPF should be strengthened to better reflect the ‘seek to further’ duty. We acknowledge that the Government isn’t seeking views on this issue through the current consultation. However, we would like to engage with the Government to discuss how this issue might be addressed in any future NPPF consultations. In the site selection report for Exmouth published in August 2024, Exmo_24, land to the north of Salterton road (opposite this site) and sits just north of the ED national landscape, the site was rejected for allocation as not seen as appropriate due to being quiet open and exposed in landscape terms and large parts have a rural rather than urban fringe character. East parts are remote from services and facilities and if developed would form a quite a large tongue of development projecting into open countryside and designated national landscape. On account of potential adverse impacts the site is not recommended for development, this would have been for 250 houses. Exmo_17 was agreed for allocating despite being a poor choice for development but in context of plan strategy directing large scale development to Exmouth on balance despite site limitation considerations allocation is seen as appropriate. Sensitive in landscape terms with extensive views south, more tranquil and more stark north, but the report fails to mention the wide views you get

from the top of the site. Fields of low ecological value do still provide a habitat for wildlife. Deer have been seen in the fields. There is not a frequent bus service. Littleham village has a pub, a seasonal café but no shops. The neighbourhood plan talks of the built up area boundary (BUAB) to cater for and contain the town and future planned development needs to protect the open countryside. There is a presumption against development in the National Landscape outside of the defined boundary. This is particularly relevant to Exmouth given the very special environment that surrounds it. However, the amount of housing development in Exmouth without the provision of adequate infrastructure argues against any development outside the boundary. The neighbourhood plan will not be allocating sites for housing outside the BUAB. Exmouth should not be a tier 1 site as does not offer potential for accommodating growth and development. Even the EDDC are not based in Exmouth, and instead are based at Honiton. Site Exmo_ 17 is a large, sloped site area of open space that is to the east of the historic Village of Littleham. The entire site is within the National Landscape, formerly Area of Outstanding Natural Beauty (AONB) and sits outside of the built-up area boundary (BUAB). It contains a network of agricultural fields that are currently farmed and a well-established walkway and cycle path, as well as the Littleham Brook and multiple Historic Environment Records (HERS). In the current neighbourhood plan the AONB is a designation that recognises the protection of its special landscape as being of national importance, equal to landscapes of our national parks. It also states that development outside of BUAB will not be supported. According to the draft plan there is no direct infrastructure concerns, but if developed there would be large scale infrastructure needs. The whole site currently does have direct infrastructure concerns. South of the site is Castle Lane, a single narrow country lane with no pavement which is in a high flood zone area (as per the current Environment Agency Flooding Plan) due to proximity to Littleham Brook and surface water run-off. West of the site is Capel Lane, a narrow road, which is sealed off to traffic 1/3 of the way up and is busy already with traffic accessing Littleham Village and the surrounding housing estate. Site 15 would have its access from Capel Lane, and this currently has a tall hedgerow across and is on one of the narrowest parts of the Lane, close to another road junction. Both Capel Lane and Castle Lane join Littleham Road which can be busy with traffic especially when Devon cliffs and World of Country life is open. Access through Littleham Village can be busy due to the bridge access near the Clinton Arms being for single traffic despite being widened in the 1930s. North of the site is B3178 (Salterton Road), a busy main road. The site access that would need to be created is opposite a very busy junction off Liverton Business Park. It is also where the local Ambulance and Fire Station is based. Recently the junction was extended to help ease traffic but has not been effective. Further down (Salterton Road) are traffic lights, but traffic lights here would be ineffective due to the increase in stationary traffic it would cause. There are no public pathways along the site's boundary with Salterton Road and it would be difficult to create a public crossing as Salterton road slopes downwards and vision would be poor for oncoming traffic.

North of the site is next to a very large underground water reservoir and there is evidence of underground piping going southwards through the site, possibly a private network. There is also Littleham ponds which are evidenced on the current OS maps. Littleham Brook runs east to west, south of the site with a pumping station further up. Running east to west through the middle of the site is the former historic Exmouth to Budleigh railway line which is now a well valued cycle path and walkway. It forms part of the National Cycle Network (Sustrans) NCN2 from Dover to St Austell and the international Tour de Manche between Plymouth and Poole. This is a valued form of green infrastructure valued by not only the local community, but further afield as well. There are 9 design principles to be on the Sustrans including its attraction and enhanced ecological features as well as being safe and accessible traffic free paths. Its currently a free to use and safe path for cyclists and walkers of all ages and accessibility needs, with no risk of potential harm from vehicles. It also helps to support both health and wellbeing of the community, deliver wider benefits for nature and support efforts to address climate change (an issue raised in the NPPF, p27 paragraph 92c and p28 paragraph 98). The site sits outside of the BUAB and is further away from local amenities and the town centre. The local historic Littleham village contains a pub, 2 community halls and a seasonal tearoom, but no shops. The closest supermarket and post office from the furthest part of the site would be more than 1600 metres. There is a small Primary School in Littleham but would be some distance from the furthest part of the site. Other primary schools and the only secondary school would not be within walking distance. The bus service is unreliable and the only bus directly to Exeter is now mainly from the town centre (a good hours walk from the closest area of the site). The closest train station is on the outskirts of Exmouth town centre and therefore not local to the site. These issues alone would add to more burdening traffic and an increase in pollution and carbon emission. Site Exmo_17 is protected by the Countryside and Rights Of Way Act 2000 (CROW). It protects the land to conserve and enhance its natural beauty. AONB require good quality scenic landscape that is relative wild due to distance from housing or having few roads, where natural sounds is predominant. It can also include natural heritage features such as habitats and cultural heritage. I agree that site 17 is very sensitive in landscape terms due to its location and visual prominence. The whole site sits within the AONB and sits above the local built-up area. The fields are currently used for agricultural use by the local farms and is rated as good to moderate. The site slopes north to south which offers extensive views into and out of site including from looking into and out of the AONB and the Southwest Coast Path. The whole site is also in the Coastal Preservation Area and borders onto the Jurassic Coastline which is part of the UNESCO World Heritage Site. I disagree that the higher northerly parts are starker, as further north of the site offers some of the best views in Exmouth of the far-reaching views of the AONB, Maer Valley and coastline. The whole site has a particular tranquillity of peace away from traffic and the built-up areas of Exmouth and a distinctive rural countryside feel, that over the years, other areas of

Exmouth has lost to development. The site is also intimate in nature with mature hedgerows and trees, including 2 trees with a TPO. Littleham Brook south of the site, also supports the local natural habitat. The site boarder's local woodland areas, private gardens, and the local churchyard. Currently the churchyard west of the site is an established biodiversity for the local flora and fauna. The whole site offers a habitat as well as a wildlife corridor for local wildlife including Bats, Birds, Hedgehogs, Deer, and Badgers. Looking at the Valley Parks and working draft plan for Exmouth, site 17 is a suggested area of land of local amenity importance due to being outside of the BUAP and in the AONB and could easily join up to the Maer Valley Park, a supposed greenspace for the community to access and enjoy. The site would also make a wonderful Dark Night at Skies protected area due to having very little light pollution facing eastwards and the only light comes from the odd farmhouse. The dark skies also help to support the local nocturnal wildlife. Paragraph 84 of the NPPF supports the need of open space. Exmouth Site 10, land to the North of B3178 (Salterton Road) was rejected for similar reasons that site 17 has. Site 10 consists of improved grassland fields that are open and exposed in landscape terms and large parts have a rural rather than urban fringe character.

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Full name: Chrissie Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Please stop the idea of building on a protected area of the National Landscape on the eastern edge of Exmouth (Exmo_17), which is outside the Exmouth Town Build Up Area Boundary (BUAB), that was agreed in the Neighbourhood plan in 2015. The Plan was to provide the community's vision for the future until 2031 and set out clear planning policies to realise the vision and to sit alongside the East Devon Local Plan (EDLP) at the same time, carrying equal legal weight. The Neighbourhood Plan appears to of been ignored in the new draft version of the EDLP.

As required by the Localism Act, the Neighbourhood Plan is accorded with higher level planning policies. The Plan is concerned with land use and its policies to help inform future planning applications. Site Exmo _17 would never have been considered for development in the Neighbourhood plan and the idea of a large-scale housing development, goes against the views of the local community. Both East Devon County Council (EDDC) councillors and Clinton Devon Estates (the landowner) have not listened to the views of the community and appear to be pushing this development through. To have Bloor Homes , the potential house builder holding public consultations, when the new Local Plan has not been finalised and planning requests for screening opinion and EIA scoping request for the proposed development of up to 450 houses (was initially for 410 houses) on the planning portal demonstrates that the community views are not being listened to. When I attended the Bloor Homes event, the plan is to enhance the public open space, as well as the housing, employment land and a community hub. We already have an amazing space to walk, cycle and enjoy the open countryside. What is planned, will not enhance, but permanently destroy the National Landscape. Formally known as the Area of Outstanding Natural Beauty (AONB), it really is a beautiful area. The views are far reaching of the countryside, with its rural charm and is valued by the community as a place to get away for exercise and health and wellbeing. Exmo_17 is also near to and can be seen from the Southwest Coast Path, which is also part of the National Trail, called the King Charles III England Coast Path. It

is part of a legacy to be enjoyed by walkers. However, the far- and wide-reaching views from the SW coast path, will be ruined by this potential housing development. The National Planning Policy Framework (NPPF) talks of sustainable development which was agreed in the Neighbourhood plan. The BUAB for Exmouth was to contain the town's future planned development needs and to protect the open countryside outside the boundary from development. This is particularly relevant to Exmouth given the very special environment surrounding the town such as the National Landscape, Jurassic coast and the Estuary. Site Exmo_17 provides a much-valued green space of local amenity value. The site has the combined footpath and cycleway with countryside views and tranquillity freely available to the public. By protecting the site, it would also continue to ensure a much-needed wildlife corridor. It is of great importance to protect existing open spaces. Planning authorities have a responsibility to minimise impacts and provide net gains in biodiversity. Green corridors provide for wildlife movement in turn enhancing biodiversity, in effect bringing the joys of the countryside into the town. Site Exmo_17 already provides this and can continue to do this in the future if not developed. National Landscapes: areas legally designated as areas of outstanding natural beauty under the National Parks and Access to the Countryside Act 1949 and Countryside and Rights of Way Act 2000.

In the National Landscapes briefing November 2024 there was discussion of Section 85 of the Countryside and Right of Way Act 2000 (CRoW Act), which was amended by the Levelling-up and Regeneration Act in December 2023. It requires relevant authorities, in exercising or performing any function that affect AONBs in England, to “seek to further the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty.” This is a statutory duty, which has been in force since December 26, 2023. The use of the word ‘duty’ in the legislation means that it is something all relevant authorities must do. The duty is considered to be a strengthening of the previous ‘duty of regard’ and seeks positive outcomes for the natural beauty, such as with National Landscapes. Within the planning context, relevant authorities are the Local Planning Authorities, the Planning Inspectorate and the Secretary of State, along with Parish Councils producing Neighbourhood Plans. The duty applies to all aspects of the development management process and the plan-making process such as planning application decisions, enforcement, and decisions relating to planning policies and site allocations in Local Plans. The duty is considered to require a pro-active approach by the decision-maker; relevant authorities are expected to be able to demonstrate that they have fulfilled the duty, and how compliance with the duty has been embedded in the plan-making and decision-making process. Natural England have advised that relevant authorities must take all reasonable steps to explore how the statutory purposes of the Protected Landscape can be furthered. The duty applies to plan-making and decision-making in relation to, or so as to affect, land in National Landscapes, not

only in considering proposals within a National Landscape, but also for affecting its setting. It is important to ensure that ‘to conserve and enhance’ is a priority in every relevant decision. The statutory duty needs to be considered in tandem with the National Planning Policy Framework (NPPF), in particular paragraphs 11, 182 and 183. Paragraph 182 of the NPPF (2023) sets out that great weight should be given to conserving and enhancing landscape and scenic beauty in national Landscapes, whereas conservation and enhancement of wildlife and cultural heritage are important considerations. However, it is important to remember that natural beauty is not just the look of the landscape, but includes landform and geology, plants and animals, landscape features, and the rich history of human settlement over the centuries. It includes landscape and scenic quality and natural heritage such as species, habitats, geology and physical such as wildness, tranquillity and dark skies, and cultural heritage (including cultural traditions and the historic and other built environment that makes the area unique). (Levelling-up and Regeneration Act 2023 section 245; Countryside and Rights of Way Act 2000 section 85). Natural England (2023) states enhanced duty in relation to Protected Landscapes refers to National Landscapes (AONBs) and National Parks. Natural England’s Planning policies and decisions must also reflect relevant international obligations and statutory requirements. Historic England make clear that the historic environment is fundamental to the distinctive character, sense of place and natural beauty of each National Landscape. It is the conservation and enhancement of all this natural beauty (usually defined in the specific statutory AONB Management Plan) that is the primary purpose of designation, and that Local Planning Authorities must consider in discharging their duty under CRoW Act (2000) s.85. LPAs are advised to ensure internal Local Authority legal teams are aware of the s.85 duty. Use of the relevant AONB Management Plan • The Management Plan, which is a statutory document, which will have been adopted by the Local Authority and which formulates their policy for the management of the area and for the carrying out of their functions in relation to it. It is the key principle for ensuring that the statutory purposes of the National Landscapes are met, and is a material consideration in the planning process. Conserving and enhancing the natural beauty of the specific National Landscape will mean conserving and enhancing the character components or special qualities identified in the Management Plan; supporting the Management Plan Objectives, Policies and/or Principles as set out for each of these; and following any Management Plan actions set out for each. Local Planning Authorities must be able to demonstrate that they have complied with the strengthened duty in any decision or action that impacts or could potentially impact on the National Landscape. To demonstrate that they have sought to further the purpose of designation in making decisions regarding planning policies, site allocations, and development management (including planning enforcement), it is considered LPAs will need to; establish the facts about the natural beauty of the area, especially with reference to the statutory Management Plan for the specific National Landscape; identify what comprises the natural beauty, using

descriptions of natural beauty, including Statements of Significance, description of key characteristics and special qualities, as set out in National Landscape Management Plans; and the natural beauty criteria (Natural England (2017) Areas of outstanding natural beauty: designation and management; Natural England (2021) Guidance for assessing landscapes for designation as National Park or AONB in England). The duty to seek to further the purpose of conserving and enhancing the natural beauty of National Landscapes applies to the full range of aspects of the plan-making process. An LPA will need to be able to demonstrate how it has, throughout all stages of the preparation of the Local Plan, sought to further the purpose of conserving and enhancing the natural beauty of the National Landscape. This includes at examination stage, addressing the s. 85 duty actively in responses to Inspector's Findings and in any proposed modifications to Local Plans including consideration of Neighbourhood Plans and to ensure the overall vision and development strategy would align with the objectives/principles/policies of the relevant National Landscape Management Plan. To identify how much of a district's objectively assessed need can be met without harming the natural beauty of the relevant National Landscape, particularly where meeting the need would require allocations that would not further the purposes of National Landscape designation which may involve setting a lower Local Plan housing requirement figure. If a draft planning policy would not align with the duty to seek to further the applicable legislative purpose (e.g. if it would conflict with any of the Management Plan's objectives/principles/policies), then consider amending the policy such that you could confidently say the decision does seek to further the relevant purpose. For decisions relating to site allocations assess what impact the proposed site allocation would have on the natural beauty of the National Landscape, considering its scale, location and landscape setting with reference to the character components/special qualities set out in the National Landscape Management Plan. (In this regard, consider including a specific criterion regarding 'natural beauty' within the Strategic Housing Land Availability Assessment (SHLAA)/Housing and Economic Land Availability Assessment (HELAA), and within the Sustainability Appraisal). Consider how the natural beauty of the National Landscape might be affected, were the site to be allocated for development. Remember to consider the holistic concept of natural beauty. Consider whether this would cause harm to the natural beauty of the National Landscape. Consider the objectives/principles/policies of the National Landscape Management Plan. Natural England have advised that the strengthened duty underlines the importance of avoiding harm to the statutory purposes of Protected Landscapes. Ensure clear differentiation between any proposed measures that seek to mitigate or compensate for harm (e.g., like-for-like replacement), and those that further the conservation and enhancement of the natural beauty of the National Landscape. Natural England have advised that measures that further the purposes are required in addition to mitigation. If the measures would have a neutral effect, consider what modifications would help further the purpose of conserving and enhancing the natural

beauty. If promoting a site allocation would not align with the duty to seek to further the conservation and enhancement of natural beauty, then consider amending or deleting a site allocation such that you could confidently say the decision does seek to further the statutory purpose. (For example, choosing not to allocate a particular site within or close to the National Landscape boundary could demonstrate compliance, where this results in avoiding harm.) Evidence how the LPA has sought to further the purpose of conserving and enhancing the National Landscape in its decision, with reference to aligning with National Landscape Management Plan objectives/principles/policies. Natural England (2023). The duty to seek to further the purpose of conserving and enhancing the natural beauty of National Landscapes applies to the full range of development management decision-making, including considering applications for outline, full and reserved matters, listed building consent, applications for works to protected trees, and prior notifications, along with enforcement work on planning breaches. An LPA should also ensure that local validation checklists require the submission of sufficient, specific information to enable them to fulfil the s.85 duty in their decision-making. For decisions relating to planning applications, assess what impact the proposal would have on the purpose of designation; consider how the natural beauty of the area might be affected, were the proposal to go ahead how the proposal would align with the National Landscape Management Plan objectives/principles/policies. Consider whether this would cause harm to the natural beauty of the area. Natural England have advised that the strengthened duty underlines the importance of avoiding harm to the statutory purposes of Protected Landscapes. Where harm is identified, enhancements themselves, including biodiversity net gain (BNG) provision, are unlikely to be sufficient to align with the duty, which has the dual consideration of conserving and enhancing natural beauty. Also, ensure that any ‘enhancements’ within the proposal do genuinely align with, and help deliver, the objectives, principles and/or policies and resulting actions of the specific National Landscape Management Plan, by way of scope and location. Natural England have advised that the proposed measures should align with and help to deliver the aims and objectives of the designated landscape’s statutory Management Plan. Ensure a clear differentiation between any proposed measures that seek to mitigate or compensate for harm (e.g. like-for-like replacement), and those that further the conservation and enhancement of the natural beauty of the National Landscape. Natural England have advised that measures that further the purposes are required in addition to mitigation. If the measures would have a neutral effect, consider what amendments would help further the purpose of conserving and enhancing the natural beauty. Could any conditions attached to any permissions help to conserve and enhance the natural beauty? As part of this assessment, consider the degree to which the effect on natural beauty has been articulated by the applicant (e.g. through LVIA’s, heritage statements, ecology and arboriculture assessments, lighting statements and transport assessments); scrutinise the submission against the Management Plan in this regard. If

supporting an application would not align with the duty to seek to further the conservation and enhancement of natural beauty, then consider seeking amendments or refusing permission, such that you could confidently say the decision does seek to further the statutory purpose. Evidence how the LPA has sought to further the purpose of conserving and enhancing the National Landscape in its intended decision, with reference to aligning with the National Landscape Management Plan objectives/principles/policies. It is recommended that this evidence is referenced in officer reports/committee reports. N.B. Consultation on planning applications with the relevant National Landscape team by a Local Planning Authority does not in itself constitute compliance with the strengthened duty. It is the responsibility of relevant authorities themselves to comply with the duty, and to assess and record how they have complied with the duty, in exercising or performing any functions affecting a National Landscape. For applications to make a tree preservation order (TPO), or when assessing applications for works to protected trees (those with a TPO or in a Conservation Area), actively consider the s.85 duty by ensuring the impact on the natural beauty of the National Landscape forms part of the assessment of ‘amenity’ when considering whether to make a TPO; and when making decisions on applications for works to protected trees, ensure the impact on the natural beauty of the National Landscape forms part of the assessment of the amenity value of the tree or woodland and the likely impact of the proposal on the amenity of the area. S.84 of the CRoW Act (2000) sets out that LPAs have power “to take all such action as appears to them expedient for the accomplishment of the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, or so much of it as is included in their area”. Assess if the planning harms the natural beauty of the National Landscape, with regard to the Management Plan Statement of Significance and objectives, principles and/or policies. Consider if any amendments could help further the purpose of conserving and enhancing the natural beauty. Ensure clear differentiation between any proposed measures that seek to mitigate or compensate for harm (e.g., like-for-like replacement), and those that further the purpose of conserving and enhancing the natural beauty of the National Landscape. Natural England have advised that measures that further the purposes are required in addition to mitigation. The housing and economic land availability assessment does not determine whether a site should be allocated for development, but it’s up to the development plan itself to determine which of those sites are the most suitable to meet those requirements. It appears that the EDDC are using our National Landscape to meet housing targets when brownfield sites have been allowed by the planner to build inappropriate housing. Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other

protected areas). Neighbourhood planning bodies may use the method set out in this guidance to assess sites but any assessment needs to be proportionate to the nature of the plan. Neighbourhood planning bodies may also make use of existing site assessments prepared by the local planning authority as a starting point when identifying sites to allocate. The East Devon planning guidance for National Landscapes states that they are Nationally designated protected landscapes. Receives the highest level of protection under the National Planning policy unique and special area. Development proposals in and affecting the national landscape must have a regard to the conservation and enhancement of its natural beauty. Give great weight to conserving and enhancing the landscape and scenic beauty of the area in order to be in conformity with the national planning policy framework. National landscapes are becoming attractive, profitable places for housing and development. Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas). Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas). Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas). National Planning Policy Framework Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects; strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless the application of policies in this framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. For decision-taking this means, not approving development proposals in protected

areas of particular importance such as National Landscapes and provides a strong reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development such as housing to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. As established through statements of common ground (see paragraph 28) the policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park or defined as Heritage Coast; irreplaceable habitats; designated heritage assets and areas at risk of flooding or coastal change. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities. Clinton Devon Estates (CDE) wildlife vision to embed wildlife improvement into all business activities and hand onto future generations a countryside more diverse, resilient, functional and ecologically valuable than we have today. CDE Strategy 2030 doing today what is right for tomorrow. Development proactive approach will be taken to identifying appropriate opportunities to provide homes and business premises for local people with sustainability at the forefront of decision making. Net zero carbon emissions by 2030. Agriculture farming models should provide products customers want to buy, enhance our soils and natural environment and provide viable business models which wildlife can flourish. Increase woodland cover. Enhancing soils and natural environment. The Rt hon Steve Reed 16th December 2024 protected landscapes to be strengthened with new legislation and guidance to protect nature. This move comes amid the Government's push to promote access to nature, as part of the wider Plan for Change. New powers are to be granted to the country's iconic National Parks

and National Landscapes to boost nature's recovery and access to the outdoors. New legislation and guidance will give National Parks and National Landscapes a clear mandate to widen the public's access to nature through strengthened purposes and make changes to improve their governance that will allow for greater innovation and collaboration to prepare them for the future. The changes announced will see more trees planted, more peat restored and more habitat created, supporting Protected Landscapes to play a leading role in meeting Net Zero, Environment Act targets and the commitment to protect 30% of land for nature by 2030 as part of our Plan for Change. Covering a quarter of England's land area, improving the state of nature in our National Parks and Landscapes is vital to the health of our ecosystems. Our Protected Landscapes are home to nationally important habitats and our most iconic species – yet many are in a poor condition with the wildlife that lives within their boundaries in steep decline and the waterways that give many of these landscapes their magic now sadly polluted. The measures will include a general power of competence for National Park Authorities, which will clarify their legal framework, removing restrictions which prevent an entrepreneurial approach, and cutting through bureaucracy to remove barriers to achieving more for people and nature. The package will also strengthen the role that public bodies, including water companies, must play in delivering better outcomes for nature, water, climate and access to nature in these special places, through new regulation that will support public bodies and Protected Landscape organisations to work more closely together. Refining the purpose and powers of National Parks and National Landscapes will promote access to nature for the millions of people who visit these iconic landscapes each year, helping them to support a thriving rural economy and enable people to reap the benefits of spending time in greener and wilder places. These changes will empower Protected Landscapes to deliver more for nature and tackle climate change over the next 75 years and beyond. This reflects their vital importance to the nation – from protecting us from flooding, to celebrating our heritage and restoring our health and wellbeing. It's seventy-five years since our National Parks and National Landscapes were created, and they have done incredible work protecting some of our most treasured and beautiful landscapes. But so much of our countryside and wildlife is in decline so we must do more to protect it. To mark this anniversary the Government will introduce new laws to boost protections for the natural world, strengthen our National Parks and National Landscapes and increase opportunities for millions of people to enjoy the great outdoors. As an immediate step, new guidance is being published today that will help public bodies work together to make these special places greener, wilder and more accessible. Natural England Chair Tony Juniper said The 1949 National Parks Act laid the foundations for modern nature conservation, enshrining in law the means to protect dozens of exceptional landscapes and thousands of our best wild places while bringing joy to millions of people across multiple generations. Despite the achievements, however, these legal protections have not been sufficient to prevent Nature's continuing decline. And whereas in decades past

the challenge was about conservation, today we must not only hang on to what is left, but to also invest in Nature's recovery. Our countryside and green spaces are a source of great national pride, and government's commitment to delivering on nature, increasing access, planting three new National Forests, creating nine new National River Walks and empowering communities to create new parks and green spaces in their communities with a new Community Right to Buy. This Government is committed to restoring nature across the country, which is why we have wasted no time in announcing a rapid review of the Environmental Improvement Plan, which thriving Protected Landscapes will be essential to delivering. This will set out pathways to clean up our waterways, reduce waste across the economy, plant millions more trees, improve air quality and halt the decline in species by 2030. A healthy natural environment is crucial to the nation's health and prosperity, which is why nature recovery is an integral part of the Governments Plan for Change to create a decade of national renewal. Protected Landscapes – the collective term for National Parks and National Landscapes – range from lowland landscapes, such as the Cotswolds and the Norfolk Coast, to uplands such as the North Pennines and the Lake District. Protected Landscapes contain half of England's priority habits and Sites of Special Scientific Interest, 60% of deep peat and around 88% of heather and acid grassland habitats. Restoring our Protected Landscapes will be essential to protecting 30% of the UK's land and sea by 2030. Protected Landscapes' refers to National Parks, the Norfolk and Suffolk Broads and National Landscapes in England. National Landscapes' is the rebranded name for areas of outstanding natural beauty (AONBs). This name change is not statutory. The Protected Landscapes duty guidance sets out how the Protected Landscapes duty is intended to operate and provides broad principles to guide relevant authorities in complying with it. Relevant authorities must now 'seek to further' the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purposes. The duty is intended to facilitate better outcomes for England's Protected Landscapes, which are in line with their statutory purposes. The duty does not prevent relevant authorities from undertaking their statutory functions and discharging their legal duties and other responsibilities.

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Full name: Lawrence Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I writing to raise my concerns that there are major planning and legal issues regarding the inclusion of EXMO_17 site within the local plan and promoting such large scale development within the National Landscape, which also used to be part of the Coastal Presevation Zone. The change to the Coastal Preservation Zone boundary is another example of where the council ride rough shode over public opinion and the wishes of local residents. The inclusion of EXMO_17 within the plan is in direct contradiction of chapter 12 of the plan and in contradiction of the National Planning Policy Framework. The council members have also rejected other sites on landscape and AONB grounds and completely ignored those same grounds when considering EXMO_17. I attach a document I put together for the regulation 18 consultation detailing why EXMO_17 should not be in the local plan.

Full name: Chrissie Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: As required by the Localism Act, the Neighbourhood Plan is accorded with higher level planning policies. The Plan is concerned with land use and its policies to help inform future planning applications. Site Exmo _17 would never have been considered for development in the Neighbourhood plan and the idea of a large-scale housing development, goes against the views of the local community. What is planned, will not enhance, but permanently destroy the National Landscape. Formally known as the Area of Outstanding Natural Beauty (AONB), it really is a beautiful area. The views are far reaching of the countryside, with its rural charm and is valued by the community as a place to get away for exercise and health and wellbeing. Exmo_17 is also near to and can be seen from the Southwest Coast Path, which is also part of the National Trail, called the King Charles III England Coast Path. It is part of a legacy to be enjoyed by walkers. However, the far- and wide-reaching views from the SW coast path, will be ruined by this potential housing development. The National Planning Policy Framework (NPPF) talks of sustainable development which was agreed in the Neighbourhood plan. The BUAB for Exmouth was to contain the town's future planned development needs and to protect the open countryside outside the boundary from development. This is particularly relevant to Exmouth given the very special environment surrounding the town such as the National Landscape, Jurassic coast and the Estuary.

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.: Removal of EXMO_17 from the plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details 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 inclusion of EXMO_17 is not sound, it is not justified nor is it consistent with National Policy. National Landscapes: areas legally designated as areas of outstanding natural beauty under the National Parks and Access to the Countryside Act 1949 and Countryside and Rights of Way Act 2000.

In the National Landscapes briefing November 2024 there was discussion of Section 85 of the Countryside and Right of Way Act 2000 (CRoW Act), which was amended by the Levelling-up and Regeneration Act in December 2023. It requires relevant authorities, in exercising or performing any function that affect AONBs in England, to “seek to further the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty.” This is a statutory duty, which has been in force since December 26, 2023.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of EXMO_17 from the plan and future protection of all areas of National Landscapes.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The inclusion of EXMO_17 is contrary to the Exmouth Neighbourhood plan and goes beyond the Built up area boundary (BUAB).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Chrissie Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: I

believe that the proposed development of site EXMO_17, will mean an extension of Exmouth on the currently undeveloped East Devon National Landscape (formerly AONB) towards Budleigh Salterton. This would open the door that no protected landscape will be safe, despite the increase in protection of National Landscapes which has been outlined by the Mp Steve Reed. Inclusion of EXMO_17 in the EDDC Local Plan fails the consistency with national policy soundness test due to severe conflicts with statutory protections, national planning policy, and local policy obligations.

1. Direct Conflict with National Planning Policy Framework (NPPF) The National Planning Policy Framework (NPPF) provides unequivocal legal protection for National Landscapes: Paragraph 176: The highest level of protection must be given to conserving and enhancing landscape and scenic beauty in National Landscapes. Development should be strictly limited in these areas. The proposed extension fundamentally contradicts this principle, as it represents large-scale urban encroachment into a protected landscape. Paragraph 177: Major development in a National Landscape should be refused unless it passes exceptional circumstances tests and is in the public interest. This proposal fails every test: No overriding need: Housing or economic growth objectives do not constitute exceptional circumstances, particularly when alternative sites exist outside protected areas. Alternative locations exist: Other areas within East Devon can accommodate growth without violating protected land status. Severe environmental and landscape harm: The development irreversibly damages the area's ecological integrity, scenic character, and ecosystem services. Legal Precedent: High Court rulings have consistently upheld AONB/National Landscape protections, ruling

that economic development or housing targets do not override statutory protection. The approval of this proposal would invite an immediate legal challenge.

2. Breach of Statutory Duty Under the Countryside and Rights of Way Act 2000 (CROW Act, Section 85) Section 85 of the CROW Act places a mandatory legal duty on public authorities to conserve and enhance the natural beauty of National Landscapes. Any decision that fails to give great weight to protection is unlawful. By approving this proposal, East Devon District Council would be in breach of this duty, making the plan legally indefensible and subject to judicial review.

3. Direct Contradiction of the East Devon Local Plan and Policy Framework The proposed extension also fails to comply with East Devon's own planning policies, making it internally inconsistent and thus unsound: Strategy 46: Landscape Conservation and Enhancement and AONBs Requires that development must enhance, not harm, the special qualities of National Landscapes. The proposal would cause irreversible harm, violating this policy outright. Policy D1: Design and Local Distinctiveness Development must respect and protect local landscape character. The urban expansion into protected countryside undermines the distinctive rural and coastal identity of Budleigh Salterton and its surroundings. Urban Sprawl Prevention & Settlement Separation The merging of Exmouth and Budleigh Salterton is a serious planning concern. National and local policy explicitly protect the distinctiveness of settlements, ensuring they are not lost to uncontrolled expansion.

4. Environmental Destruction and Irreversible Harm The East Devon National Landscape is one of the most ecologically valuable and visually iconic landscapes in the UK. Development would result in: Biodiversity loss: This area hosts legally protected species and priority habitats under the Wildlife and Countryside Act 1981 and the UK Biodiversity Action Plan. Destruction of irreplaceable ecosystems: The undeveloped land acts as a natural carbon sink, floodplain, and wildlife corridor. Increased climate risk: Removing these natural defences increases flood risk, reduces climate resilience, and worsens ecological degradation.

5. Legal Risk of Judicial Review and Government Intervention This proposal is legally indefensible. If included in the Local Plan: It is highly likely to be legally challenged under the CROW Act and NPPF non-compliance. Past judicial reviews have struck down developments in National Landscapes where local authorities failed to provide a lawful justification. Conclusion: The Local Plan is Unsound and Legally Indefensible This proposal directly contradicts national policy, breaches statutory duties, violates East Devon's own Local Plan, and would likely be overturned in court. To remain legally compliant, policy-consistent, and defensible, East Devon District Council must exclude this proposal from the Local Plan.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See previous answer

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: If EDDC agree to develop this site, they will be in breach of the statutory legislation that is there to protect National Landscapes from development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a local member of the community I also see myself as a ambassador for the national landscape and would like to be involved in pteirctimg this site Exmo_17 for future generations.

Full name: Lawrence Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The inclusion of EXMO_17 as a potential development site strongly contradicts the outstanding natural landscapes chapter of the plan. The inclusion of EXMO_17 is also against the National Planning Policy Framework paragraph 176 and 177. And can also be viewed as a breach of statutory duty under the CROW Act 2000 section 85.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_17 as a potential development site from the plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details 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 selection of EXMO_17 is not justified, identical arguments that could be used to rule-out EXMO_17 were used to discount other sites but we're not used for EXMO_17 for some reason. Examples are given towards the end of the attached pdf document.

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.: EDDC Should not

pursue development in EXMO_17 and it should be removed as a development area from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lawrence Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The inclusion of Land to the South of Littleham, (EXMO_17) is not legally compliant. The land highlighted for development is within the National Landscape (Formerly AONB) and therefore is a protected Landscape, both legally and within this very plan.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of EXMO_17 as a future development site.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details 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 selection of EXMO_17 as a development site is not justified. Other potential development sites were rejected due to their potential impact on the landscape. EXMO_10 reasons for rejection included the open and exposed nature of the site in terms of the landscape and its rural rather than urban fringe character. Honiton04 rejected due to its high landscape impact and the site being within the AONB. Honiton12 rejected due to the impacts on landscape, heritage, ANOB and the adjoining grade 2* church. Exactly the same situation as EXMO_17. EXMO_17 is not justified, neither is it consistent with national policies relating to development in the National Landscape.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: EXMO_17 should be removed as a development site from the plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The inclusion of EXMO_17 does not demonstrate any thought of corporation, neither does it show any respect for environmental designations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Stephanie Hunns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I

strong object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Caroline Hunt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor’s, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Darren Hunt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor’s, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Flora Hunter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to

Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Alison Hurst

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

We believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Alison Hurst

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: The policy was lawful

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe that the proposed development of site EXMO_17, which by its very nature will mean an extension of Exmouth eastward on the currently undeveloped East Devon National Landscape (formerly AONB) towards Budleigh Salterton. Inclusion of EXMO_17 in the East Devon District Council Local Plan fundamentally fails the "Consistent with national policy" soundness test due to severe conflicts with statutory protections, national planning policy, and local policy obligations.

1. Direct Conflict with National Planning Policy Framework (NPPF) The National Planning Policy Framework (NPPF) provides unequivocal legal protection for National Landscapes: Paragraph 176: The highest level of protection must be given to conserving and enhancing landscape and scenic beauty in National Landscapes. Development should be strictly limited in these areas. The proposed extension fundamentally contradicts this principle, as it represents large-scale urban encroachment into a protected landscape. Paragraph 177: Major development in a National Landscape should be refused unless it passes exceptional circumstances tests and is in the public interest. This proposal fails every test: No overriding need: Housing or economic growth objectives do not constitute exceptional circumstances, particularly when alternative sites exist outside protected areas. Alternative locations exist: Other areas within East Devon can accommodate growth without violating protected land status. Severe environmental and landscape harm: The development irreversibly damages the area's

ecological integrity, scenic character, and ecosystem services. Legal Precedent: High Court rulings have consistently upheld AONB/National Landscape protections, ruling that "economic development" or "housing targets" do not override statutory protection. The approval of this proposal would invite an immediate legal challenge.

2. Breach of Statutory Duty Under the Countryside and Rights of Way Act 2000 (CROW Act, Section 85) Section 85 of the CROW Act places a mandatory legal duty on public authorities to conserve and enhance the natural beauty of National Landscapes. Any decision that fails to give "great weight" to protection is unlawful. By approving this proposal, East Devon District Council would be in breach of this duty, making the plan legally indefensible and subject to judicial review.

3. Direct Contradiction of the East Devon Local Plan and Policy Framework The proposed extension also fails to comply with East Devon's own planning policies, making it internally inconsistent and thus unsound: Strategy 46: Landscape Conservation and Enhancement and AONBs Requires that development must enhance, not harm, the special qualities of National Landscapes. The proposal would cause irreversible harm, violating this policy outright. Policy D1: Design and Local Distinctiveness Development must respect and protect local landscape character. The urban expansion into protected countryside undermines the distinctive rural and coastal identity of Budleigh Salterton and its surroundings. Urban Sprawl Prevention & Settlement Separation The merging of Exmouth and Budleigh Salterton is a serious planning concern. National and local policy explicitly protect the distinctiveness of settlements, ensuring they are not lost to uncontrolled expansion.

4. Environmental Destruction and Irreversible Harm The East Devon National Landscape is one of the most ecologically valuable and visually iconic landscapes in the UK. Development would result in: Biodiversity loss: This area hosts legally protected species and priority habitats under the Wildlife and Countryside Act 1981 and the UK Biodiversity Action Plan. Destruction of irreplaceable ecosystems: The undeveloped land acts as a natural carbon sink, floodplain, and wildlife corridor. Increased climate risk: Removing these natural defences increases flood risk, reduces climate resilience, and worsens ecological degradation.

5. Legal Risk of Judicial Review and Government Intervention This proposal is legally indefensible. If included in the Local Plan: It is highly likely to be legally challenged under the CROW Act and NPPF non-compliance. Past judicial reviews have struck down developments in National Landscapes where local authorities failed to provide a lawful justification. Conclusion: The Local Plan is Unsound and Legally Indefensible This proposal directly contradicts national policy, breaches statutory duties, violates East Devon's own Local Plan, and would likely be overturned in court. To remain legally compliant, policy-consistent, and defensible, East Devon District Council must exclude this proposal from the Local Plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EDDC should not pursue development in EXMO_17 because they would breach planning law and ultimately would end up in years of litigation and that only Government had the power to change planning law, not EDDC

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.:

EDDC should not pursue development in EXMO_17 because they would breach planning law and ultimately would end up in years of litigation and that only Government had the power to change planning law, not EDDC

Full name: Chris Hurt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. Disruption of the traffic free cycle and footpath should not be allowed.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Rachel A Hyde

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is closer to Budleigh Salterton than Exmouth and the town is already overstretched with an existing need for more doctors, dentists, buses etc. In addition this would lead to the two towns forming a conurbation contrary to POLICY OL05. It would also disturb and probably decimate nature, harm the historic site of St John in the Wilderness and create a flood risk along the Withycomb Brook. Any new site would also require its own shops, public transport and other amenities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20 needs to be either considerably reduced or at least have its own amenities. Exmouth should be the town residents use rather than the much smaller Budleigh Salterton, and a lot more needs to be done to safeguard environmental and historical issues.

Full name: Jan Billington

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO_20 will destroy the 'tranquility, wildness and dark skies' of the countryside and is contrary to POLICY OL01. EXMO_20 is in conflict with POLICY OL09 and POLICY PB04.

It would absolutely require the need for car travel as the nearest town is Tier 3 Budleigh Salterton which has no train station, secondary school or even bank! It is in conflict with Paragraph 11.2.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site needs to be significantly reduced in size as previously recommended and accessed via Dinam way so as not to take vehicle access onto the boundary of the SSSI>

Full name: Jan Billington

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: EDDC are ignoring national regulations to meet "minimise need to travel and provide access to sustainable transport" net zero targets by building EXMO_20 in an area where the nearest town is 2 miles away tier 3 and has no railway station and inadequate buses. There is no option but to use cars in these circumstances for all amenities.

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.: Put vehicle access for this huge development at the bottom of the site closest to the railway station.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: EDDC are ignoring national regulations to meet "minimise need to travel and provide access to sustainable transport" net zero targets by building EXMO_20 in an area where the nearest town is 2 miles away tier 3 and has no railway station and inadequate buses. There is no option but to use cars in these circumstances for all amenities.

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.: Put vehicle access for this huge development at the bottom of the site closest to the railway station.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Putting huge developments in total isolation from major transport hubs and facilities forces adults and children into cars for work and school runs and to visit all but the most basic amenities. The SSSI site which the entrance to this EXMo_20 abuts will suffer with resulting vehicle pollution.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jan Billington

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EDDC introduced this previously rejected site between Regs 18 and 19 and have not consulted on it. EXMO_20 has been rejected by HALAA and by EDDC own planning team. The development site abuts the boundary of the Ward of Budleigh and Raleigh. It is only 1.5 miles to Budleigh Town which is the only town within the National Landscape and a Tier 3 town with no secondary school, a full Primary school , no Bank and no rail links. EDDC seem to think this it is appropriate locations for 700-1000 homes. The only vehicle access onto the B3179 is dangerous and right against one of the SSSI top three sites in Europe. It could not have been more ill conceived on many levels.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to previous EXMO _20B

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.: Budleigh Salterton Town Council chair of planning was given 3 minutes consultation at the strategic planning meeting and requests for inclusion and consultation have been ignored. Two district councillors who have attempted to raise objections have been told that “it is a done deal”. This is NOT how consultation works.

This development is contrary to numerous policies and should not have been pushed through against policy advice. It contravenes OL01; OL09< PB04, HE02; TR01, OL05 etc etc.

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.: Budleigh Salterton has been completely side lined in this whole process to a shocking degree.

Full name: Chrissy Howick

Organisation (where relevant): Budleigh Salterton Riding School

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

conflict with Policy TR03 and figure 7 in the local plan. The proposal of 700 properties would add around 1000-1500 cars to the B3179. The quickest cut through to Budleigh Salterton from the B3179 is down Dalditch Lane including busses and lorries too large for the little lane - and it is an often used rat run including DCC minibusses. On numerous occasions in 2024 the B3179 was closed due to accidents and incidents. Traffic was then diverted (or if not diverted chose to go) down Dalditch Lane. This then put both the public and staff of Budleigh Riding School in severe danger. The business relies on moving horses to their fields up and down Dalditch Lane and through Knowle and taking public down Dalditch Lane. The gridlock situation and hundreds of cars going down a lane which is not suitable even for a few cars caused accidents and resulted in injury of both horses and riders. The go ahead for this development would mean that the riding school (which has been running since 1985 and is a huge local employer, local alternative education provider and provider of many work experience placements and school activity provider) may no longer be able to run due to safety concerns. This would mean the loss of much local employment - both directly and indirectly and sadly the inevitable destruction of many horses.

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 Exmou_20 from local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: please see previous submissions

Full name: Geoff Crawford

Organisation (where relevant): ESCAPE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed housing allocations in Exmouth ... A town currently with insufficient sewerage

infrastructure, demonstrably broken sewage network and demonstrably under capacity of the sewage treatment facility so without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy does not take into account the already acknowledge failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;

2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;

3. Harbours, estuaries or the sea;

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: EDDC are aware of the failure and under capacity of the sewage network infrastructure across Exmouth. However, they have chosen not to highlight that within the Local Plan and indeed have ignored this most important or infrastructure requirements. I feel it necessary therefore to present the evidence of this failure.

Full name: Nicola Daniel

Organisation (where relevant): ex-chairman Otter Valley Association

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: he

EDDC 2013-2031 Local Plan includes the following paragraph 18.47. I cannot understand how EDDC planners can put forward this large development in such proximity to the internationally designated Pebblebed Heath commons. Increased outdoor pursuits and domestic animals will interfere with the wildlife of the Commons and also heritage assets. Exe Estuary and Pebblebed Heaths 18.47 The Council has formed the view, after receiving advice from Natural England (the government agency responsible for the promotion of wildlife), that there is a risk that residential development (and occupants/their pet) could impact on East Devon Heaths SPA or the Exe Estuary SPA boundary. This advice is reinforced by follow-on work on Habitat Regulations assessment. A particular concern raised by Natural England is that new housing development may have an adverse effect on the SPAs; for example an increase in recreational activity and dog walking may disturb the ground-nesting birds on the Heaths or roosting or feeding birds on the Exe Estuary. Predation of birds by domestic cats is already identified as a particular concern on the East Devon Pebblebed Heaths and any increase in the number of homes could be expected to increase in cat numbers and further exacerbate adverse impacts/predation. To help preserve the integrity of the East Devon Pebblebeds Heath, specifically on account of the impacts of domestic cats

through bird predation, new dwellings will not be allowed on or within 400 metres of the Heaths Special Protection Area. This could be legally challengeable.

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 from the consultation

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Edward Clarke

Organisation (where relevant): Sherwood's Tree Care

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We Should NOT be building on Green Field sites. Nature should have a seat at the table, where these decisions are made. There are plenty of empty properties and urban sites which sit there, unused, for years.

The accommodation needed could be efficiently, affordably and ecologically soundly built in prefabricated form, by architects today; giving the youngsters an affordable step onto the property ladder.

The main access point of Exm_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the “tranquility, wildness and dark skies”, which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsuitable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Edward Clarke

Organisation (where relevant): Sherwood's Tree Care

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the “tranquility, wildness and dark skies”, which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsuitable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: robert agar

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I do not fully understand the question but I oppose the development exmo-20

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I do not understand this question

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo-20 seems totally out of proportion to the area and being so close to the peppled common seems reckless to say the least. I have lived in exmouth for 40 years but gave up cycling on the main roads 20 years ago because of car drivers passing you at 50 miles an hour plus inches from your handlebars, I continue to ride off road and on the excellent cycle paths but now consider road cycling a suicidal pastime and the extra traffic 700 new houses would provide would make this much worse. The roads leading to this area seem to have been built in the 1920s at a guess and are totally inadequate for the volume of modern traffic, the large earth moving trucks from the goodmoore farm development are eroding the fragile roads to near farm track quality. If 700 new houses are built this provides extra strain on doctors schools and services are stretched super thin so I feel there is no benefit to community so I oppose this development strongly.

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.: Smaller ,not so close to the common and with some benefit to the community

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I only knew of this one week before the closing date so more notification to cooperate would be good

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Information be it by email or in person

Full name: Nicola Jayne Ashton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. Two further faults with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath and the fact that Exmouth is already over developed with insufficient infrastructure for even the current population and has a sewage system that is unfit for purpose I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Nicola Jayne Ashton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed housing allocations in Exmouth ... A town currently with insufficient sewerage infrastructure, demonstrably broken sewage network and demonstrably under capacity of the sewage treatment facility so without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan."

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove site Exmo_20 from the Local Plan The policy does not take into account the already acknowledge failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Judith Anne Bishop

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Despite the best intention of all concerned with the planning proposal to make the development climate friendly by encouraging walking and cycling commutes into Exmouth, we all know that in this current environment with all the time constraints everyone has, no one has the time to contemplate these methods of transport and vehicles will be used in large volumes.

There has been a lot of surveying carried out in the area recently. It seems inconceivable that it looks like professional surveyors have turned a blind eye to the potential traffic problems this current access road proposal would cause! As you will see there are two access areas into Meadow View Road off Dinan Way. The entrance nearest St Johns Road has a very small access road leading into Meadow View Road before you reach a give way T junction with traffic approaching from both sides along Meadow View Road to gain access to Dinan Way via this small access road. Turning right from this T junction towards the entrance of Southern Wood it is plain for all to see that residents park vehicles on one side of the road resulting in single track traffic with a few passing places. This would not work with a projected increased volume of through traffic for 1,000 houses. It could possibly cause back ups on Dinan Way waiting to turn into this access road when vehicles come to a stand still at the T Junction to give way on Meadow View Road.

Turning into the second entrance into Meadow View Road does provide a flow of traffic without hitting give way signage. However, again, it cannot be missed that residents park

their vehicles on the roadside which narrows access to single track traffic with a few passing places. Both these situations would cause problems with emergency services seeking entrance to the new development via Southern Wood. The proposal being made should be raised with the emergency services. Turning to Southern Wood itself, which is considered as an access to a new development, it is a narrow residential cul de sac road purposely built to serve 12 properties. The proposal to make this a thoroughfare for over a 1,000 houses will disturb the ecology of the wood with the increased movement, noise and pollution from a large volume of vehicles. It will have a detrimental and devastating affect to the protected wildlife that use this woodland.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There are alternative solutions which could be considered for access to this development. There is a road to the new development already established off the Salterton Road through Liverton business park. Traffic lights as at the top of DinanWay would make access to and from the development safe. Alternatively a new link road could be built further along Salterton Road just past the Pink Houses exclusively for access to the development.

Full name: Judith Anne Bishop

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: It is outrageous to think that woodland that has been on the edge of Exmouth for hundreds of years is being considered as a route through to the proposed development. It would appear that a proportion of the woodland would be subjected to destruction to make way for a new road which would affect the whole ecology of the woodland.

The protected wildlife that this woodland serves houses many species and includes Otters, Bats, Magpies, Collared Doves, Woodpeckers, Wood Pigeons, Owls, Falcons, Rooks, Crows, Deer and Dormice, all seen in the garden of 6 Southern Wood! This needs to be brought to the attention of the appropriate authorities. All species have lawful legal protection through the appropriate legislation/Acts . Work has already been undertaken in the felling of trees in the area at the end of Southern Wood where the access road would cross the watercourse, presumably to assist with surveying. Has this been done legally?

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Our property is at the end of the cul-de-sac and has a Withycombe Brook running along the

edge of the boundary. Having lived at the property for nearly 40 years the bank of the watercourse has had no problems until the last 6/7 years where the volume of the water flow has severely increased to the degree that it is now causing extensive damage and erosion to the banks. No doubt the UK's climate changing weather patterns contributes to this due to the excessive run off of rain water from the adjacent fields proposed for development. The damage became so extensive that in June 2021 contact was made with the Environment Agency to discuss options in preparation to control the increased water flow adjacent to our property. There are other properties that have their boundary adjacent to the watercourse who will require bank protection.

How can the consideration of further extensive rain water run off, through a very large housing development, be considered which would lead to further increased volumes of water flow through the winter months? The area around the watercourse is in a designated flood zone with bank erosion now taking place. Should this development proceed the residents would seek financial assistance to meet the cost for work to protect the banks from the increased water flow volumes that would occur. This problem could be a major concern for flood risk with the full length of the watercourse banks being unprotected down stream from the site of the development.

It is our intention to contact the Environment Agency to obtain their views and seek advice on this situation.

Everyone is already aware of the infrastructure problems that Exmouth is experiencing and yet Budleigh is by far closer to the development than Exmouth Town. Both towns would require infrastructure investment to cover the lack of schools, Doctors surgeries for health appointments, major sewerage problems, road infrastructure to name a few of the problems that are now existing and will be made worse by further development. We feel that the Council is being held to ransom by the Government with threats that do not consider the wider effects and implications that this will have on Exmouth and Budleigh and somehow needs to be addressed politically.+

Full name: Judith Anne Bishop

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Further to my email sent on 28/03/2025 10:20 raising objections to the proposed Exmo_20 development a group of residents have carried out further research which the content needs to be raised as objections to the proposed Exmo_20 development.

objection1 Exmo_20 is on the reasonable alternatives list on p.328, with the justification that all the sites were assessed as suitable, available and achievable in the HELAA, Exmo_20 was in fact not. This provides evidence that Exmo_20 does not have potential to be delivered, its inclusion is unjustified and must be omitted from the Local Plan. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Objection 2 The Sustainability Appraisal Framework should make reference to the Mitigation Hierarchy which prioritises avoidance over mitigation. This is the structured approach to managing environmental impacts embedded in several key pieces of legislation. Some of the most relevant include:

1. The Environmental Impact Assessment (EIA) Regulations (2017)
2. The Environment Act 2021
3. The National Planning Policy Framework (NPPF)
4. The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations)
5. Defra's Biodiversity Metric and Biodiversity Net Gain Guidance To not implement this in the site selection methodology or process is not consistent with national policy and therefore not sound. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20. Objection 3 Figure 2.2 (p.11) states "1.

Biodiversity: to conserve and enhance the habitat and wildlife of our natural environment. Natural habitats and biodiversity; flora and fauna Ensure current, and potential future, habitat connectivity is not compromised”. Allocation of Exmo_20, a supporting habitat for foraging Nightjars would be contrary to this, furthermore Exmo_20 is located on the SNA 368 which is being allocated as a site with the Devon Local Nature Recovery Network (LNRS) as required by the Environment Act 2021, so allocation would be in conflict with this strategy of conserving and enhancing the habitat and wildlife of our natural environment. This is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20. On page 11/12 it states “4. Climate change and carbon emissions. Development that minimises the need to travel by providing access to public transport, cycle.” Allocation of Exmo_20 would not minimise the need to travel, as it is in an unsustainable location with the main site access point now out onto the B3179 country road. Allocation of this site is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20. On page 18, figure 2.4: Site criteria to be considered as a ‘reasonable alternative’ confirms that Exmo_20 cannot be a reasonable alternative as it failed the HELAA stage being deemed “not suitable or achievable” (HELAA Appendix E(v)1). Its allocation is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20. Objection 4 In the Exmouth Sites Biodiversity objective on (p.331/332), two sites, Exmo_04 and Exmo_20 score double negative (--). The commentary and conclusions between the two sites are inconsistent and unjustified. Exmo_04 results in part allocation outside of the 400m yet Exmo_20’s allocation runs right up to be adjacent to the protected site. In the Exmouth Sites Hist. built env. commentary (p.334), the large size of the site is assumed to enable the adverse impacts to have a minor negative effect. Firstly the site has significantly shrunk since the ownership was actually checked after allocation on 3rd September 2024, secondly the top 400m of the site cannot accommodate housing and thirdly it is the size required to accommodate 700 houses, therefore I do not believe an assumption that mitigation can be incorporated is sufficient justification. In the Exmouth Sites climate change carbon emissions commentary (p.335), a figure of 1,600 metres is used, this should be 800m as the 1600m is total trip ‘there and back’ [All links reference on p.186 of the Local Plan are broken/out of date but the Government’s National Design Guide does states 800m. “Sustran, Walkable neighbourhoods” also states 800m as standard walkable distance and 1600m total trip]. Distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. As the main site access point is now out onto the B3179 country road, this should be a material consideration in this section. This site is not in a sustainable location and its allocation is therefore not consistent with national policy. Other sites, shown as preferred within

the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Objection 5 In the Exmouth Sites climate change adaption commentary (p.336), there is no mention Exmo_20 having flood risk at the lowest end of the site. Nor is it mentioned that this large greenfield area entirely drains into Withycombe Brook, which has significant identified flood risk in Exmouth and has not been assessed in the Strategic Flood Risk Assessment of this draft Local Plan [EDDC Level 1 Strategic Flood Risk Assessment – Final Report February 2024 p.69 states “This table does not provide information on all Main Rivers in East Devon. Other Main Rivers within East Devon are: Grindle Brook, Wotton Brook, Withycombe Brook, Budleigh Brook, Back Brook, Snod Brook, The Gissage and Woodhayne Range.”]. Considering the existing conditions, that the Brook runs through the centre of the largest settlement in East Devon, and the substantial size of the proposed Exmo_20 allocation upstream, this is unjustified. In the Exmouth Sites access to services commentary (p.338), a figure of 1,600 metres is used, this should be 800m as the 1600m is total trip ‘there and back’ [All links reference on p.186 of the Local Plan are broken/out of date but the Government’s National Design Guide does states 800m. “Sustran, Walkable neighbourhoods” also states 800m as standard walkable distance and 1600m total trip]. Distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. As the main site access point is now out onto the B3179 country road, this should be a material consideration in this section. Using the 1,600 metre figure is unjustified. In the Exmouth Sites connectivity and transport commentary (p.340), It is claimed that Exmo_20 is within 800m of the A376, this is not true, therefore unjustified. Also of note is that distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. As the main site access point is now out onto the B3179 country road, this should be a material consideration in this section. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Objection 6 On p.340 it states “Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:

- Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment, though for areas of Exmo_04 and 20 within 400 metres of the Pebblebed Heaths mitigation would not be seen as possible. Exmo_04 can be amended to exclude the most sensitive area, resulting in Exmo_04a.” Why is it only Exmo_04 that can be amended? It’s inconsistent and therefore not justified. The

site allocation and the settlement boundary must be repositioned 400 metres from the Pebblebed Heaths. On page 342 Exmo_20 is listed as a preferred alternative for Exmouth, yet as it failed HELAA being deemed “not suitable or achievable”, in accordance with the 2.4 of this Sustainability Appraisal report, it cannot be a preferred alternative. The document is inconsistent, not justified and therefore not sound. On p.343 the reason for rejecting sites lists: Exmo_04b – Land at Marley Drive is rejected due to major adverse biodiversity effect arising from its location within 400 metre Pebblebed Heaths exclusion zone. This is inconsistent with the Exmo_20 allocation and therefore not justified and not sound. The site allocation and the settlement boundary must be repositioned 400 metres from the Pebblebeds Heath.

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Dinan Way has become an extremely busy road and will only increase further with the link to the A376. There has been a lot of surveying carried out in the area recently. It seems inconceivable that it looks like professional surveyors have turned a blind eye to the potential traffic problems this current access road proposal would cause! As you will see there are two access areas into Meadow View Road off Dinan Way. The entrance nearest St Johns Road has a very small access road leading into Meadow View Road before you reach a give way T junction with traffic approaching from both sides along Meadow View Road to gain access to Dinan Way via this small access road. Turning right from this T junction towards the entrance of Southern Wood it is plain for all to see that residents park vehicles on one side of the road resulting in single track traffic with a few passing places. This would not work with a projected increased volume of through traffic for 1,000 houses. It could possibly cause back ups on Dinan Way waiting to turn into this access road when vehicles come to a stand still at the T Junction to give way on Meadow View Road.

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How can the consideration of further extensive rain water run off, through a very large housing development, be considered which would lead to further increased volumes of water flow through the winter months? The area around the watercourse is in a designated flood zone with bank erosion now taking place. Should this development proceed the residents would seek financial assistance to meet the cost for work to protect the banks from the increased water flow volumes that would occur. This problem could be a major concern for flood risk with the full length of the watercourse banks being unprotected down stream from the site of the development.

It is our intention to contact the Environment Agency to obtain their views and seek advice on this situation.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. Despite the best intention of all concerned with the planning proposal to make the development climate friendly by encouraging walking and cycling commutes into Exmouth, we all know that in this current environment with all the time constraints everyone has, no one has the time to contemplate these methods of transport and vehicles will be used in large volumes.

There has been a lot of surveying carried out in the area recently. It seems inconceivable that it looks like professional surveyors have turned a blind eye to the potential traffic problems this current access road proposal would cause! As you will see there are two access areas into Meadow View Road off Dinan Way. The entrance nearest St Johns Road has a very small access road leading into Meadow View Road before you reach a give way T junction with traffic approaching from both sides along Meadow View Road to gain access to Dinan Way via this small access road. Turning right from this T junction towards the entrance of Southern Wood it is plain for all to see that residents park vehicles on one side of the road resulting in single track traffic with a few passing places. This would not work with a projected increased volume of through traffic for 1,000 houses. It could possibly cause back ups on Dinan Way waiting to turn into this access road when vehicles come to a stand still at the T Junction to give way on Meadow View Road.

Turning into the second entrance into Meadow View Road does provide a flow of traffic without hitting give way signage. However, again, it cannot be missed that residents park their vehicles on the roadside which narrows access to single track traffic with a few passing places. Both these situations would cause problems with emergency services seeking entrance to the new development via Southern Wood. The proposal being made should be raised with the emergency services.

Turning to Southern Wood itself, which is considered as an access to a new development, it is a narrow residential cul de sac road purposely built to serve 12

properties. The proposal to make this a thoroughfare for over a 1,000 houses will disturb the ecology of the wood with the increased movement, noise and pollution from a large volume of vehicles. It will have a detrimental and devastating affect to the protected wildlife that use this woodland.

There are alternative solutions which could be considered for access to this development. There is a road to the new development already established off the Salterton Road through Liverton business park. Traffic lights as at the top of DinanWay would make access to and from the development safe. Alternatively a new link road could be built further along Salterton Road just past the Pink Houses exclusively for access to the development.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. Everyone is already aware of the infrastructure problems that Exmouth is experiencing and yet Budleigh is by far closer to the development than Exmouth Town. Both towns would require infrastructure investment to cover the lack of schools, Doctors surgeries for health appointments, major sewerage problems, road infrastructure to name a few of the problems that are now existing and will be made worse by further development. We feel that the Council is being held to ransom by the Government with threats that do not consider the wider effects and implications that this will have on Exmouth and Budleigh and somehow needs to needs to be addressed politically.+

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

Do not access the site from Southern Wood.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to participate to raise awareness of the issues from a direct inhabitant of the area affected.

Full name: Karen Blackhall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

As Exmo_20 is nearer to Budleigh the services and infrastructure will not cope. It undermines the settlement hierarchy and would lead to issues contrary to POLICY OL05 of the local plan.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It would cause harm to an important wildlife habitat; Pebblebed Heath and is contrary to POLICY PB01 of the local plan and is not in accordance with the mitigation strategy

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Either remove Exmo_20 from the local plan or severely reduce the size to avoid negative impact on the area and the current population

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paula Brown

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

- Exmo_20 would destroy the tranquility, wildness and dark skies of the countryside, which is contrary to POLICY OL01

- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site (including the common lizard, slow worms and Dormice) contrary to PARAGRAPH 13.9. The Common Lizard is confirmed to be present in the area of Exmo_20 and are protected under the Wildlife and Countryside Act 1981. Slow worms are confirmed present in Exmo_20. They are confirmed to be endangered and are therefore a priority species under the UK Biodiversity access plan. Dormice are confirmed to be present in Exmo_20. They are confirmed to be endangered and are therefore a priority species under the UK Biodiversity Plan and protected under the Wildlife and Countryside Act 1981.

- The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to ..air quality (East Devon Pebblebed heaths SAC/SPA). Exmo _20 is in conflict with POLICY OL09 and POLICY PB04.

- Exmo_20 would have significant adverse effects on St John and the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY AR01B.

- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe, This is in conflict with POLICY AR01B.

- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

- The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services in Budleigh (High Street, Doctors, school, beach etc) would be the obvious choice for residents of Exmo _20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove or reduce the size of Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To make representations in respect of the proposed developments and to ensure that the species outlined above are considered as part of the plan.

Full name: Mr. Peter John Cook

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at EXMOUTH-20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA) . Developing Exmouth-20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmouth-20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mrs Polly Anna Crofts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less harm to pebbled heaths and the wildlife specific to these areas. Developing EXmo_20 is contrary to POLICY PB01. Exmo_20 would destroy the "tranquillity, wildness and dark skies of the countryside (Policy OL01) and would destroy wildlife corridors contrary to paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable veteran trees and hedgerows (contrary to paragraph 13.9). There is already too much congestion in the lanes around this area and more housing would increase pressure on roads that are already dangerous due to poor visibility at junctions and sharp bends.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan before you turn Exmouth into a sprawl and undermine the community already here.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Nadine Ebsworth

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via the B3179 Do not access the site via Southern Wood Do not proceed with the project

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jed Falby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: IT BUILDS A MUCH BIGGER SUBURBAN TOWN JOINING EXMOUTH TO BUDLEIGH SALTERTON Contrary to Policy OL05 of the Local plan

THERE MUST BE A BETTER SITE FOR 700 HOMES!

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: REMOVE Exmo_20 from Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmouth is building too close to Budleigh Salterton.

EXMOUTH IS STEPPING ON BUDLEIGH SALTERTON'S TOES!

Full name: Jed Falby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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

Full name: Richard K Halstead

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could not and should be located on an alternative site where it would cause less or no harm to the Pebblebed heaths (SAC/SPA/ NNR). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01

A number of rare or endangered species are at sites very close to the proposal.

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects on integrity in relation to ...air quality (East Devon Pebblebed Heaths SAC/SPA. Exmo_20 is in conflict with POLICY OL09 and Policy PB04

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It

would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. The creation of hard surfaces and drainage would put more pressure on the South West Water infrastructure. This is in conflict with Policy AR01B

The main highways access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, Meaning that it would be more associated with Budleigh Salterton in terms of its accessibility and put increased pressure on the smaller towns infrastructure, services etc. This would be a catalyst for the towns loss of identity with the inevitability it would become (coalescence) a suburb of Exmouth in the long term.; contrary to POLICY OL05 of the local plan.

Exmo_20 would increase car travel and increase traffic congestion, with impact on settlement of Woodbury and the environment over the Pebblebed Heaths. The existing roads are unsuitable for a significant increase in traffic. Any highway improvement as would impact significantly on the status NNR/SAPSAC) of the area in terms of tourism, peoples recreational enjoyment and wildlife contrary to POLICIES) L01, PB01, PB 04, 90. Policy – Due consideration of protected and notable species

The site is too close to the NNR which recognises the importance of the heath locally and National. The site is too close to the boundary of the National Nature Reserve. Exmo_20 would have Significant implications for the nature and wildlife contrary to 88. Strategic Policy – Local Nature Recovery Strategy and Nature

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan Any Development should be accessed from Exmouth. Do not access the eastern side of Exmouth directly onto the B3179

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

These comments refer to Chapter 5 of the Plan as indicated on the Commonplace platform. Allocation of Exmo_20 would be in conflict with POLICY PB06, as the SNA 368 is currently being finalised as being allocated as part of Devon's Nature Recovery Network under the Local Nature Recovery Strategy in accordance with the Environment Act 2021 - due to it's biodiversity, importance as a supporting foraging habitat and wildlife corridor between the coast and the Heath. There are alternative locations for housing within the EDDC area on sites which have passed the HELAA assessment (NB Exmo_20 Failed), but due to the relevance of the location of the SNA 368 for the local natural environment it cannot be relocated elsewhere. The LPA does not appear to have taken this into consideration regarding the proposed Allocation of Exmo_20. The Exmo_20 Allocation is therefore not justified nor consistent with National Policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Other sites, which did pass HELAA and were shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

These comments refer to Chapter 5 of the Plan as indicated on the Commonplace platform. The Plan is not sound because Exmo_20 was determined to be neither achievable nor suitable in the HELAA. The site as presented during the Regulation 18 stage was also not available, due to multiple land owners not being listed on the Agent's submission documents nor notified accordingly. The site, Exmo_20 is therefore not available, not suitable and not achievable. The NPPF states (para 72 in 2024 or para 69 in 2023 version) - "Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and and likely economic viability." With regard to economic viability, taking into account the requirements for this site in terms of (i) Highways mitigation - upgrades will be required to significant parts of the B3179 & B3180 most notably the junction with Hulham Road. (ii) Pebblebeds Heath SAC/SPA European site mitigation - addressing the "inherent conflicts" (HRA 2025) regarding excessive nitrogen levels, in accordance with the Habitat Regulations (no mitigation strategy is yet proposed in the HRA), taking specific account of the onerous application of the Dutch Nitrogen case. (iii) Pebblebed Heaths SAC/SPA European site mitigation - addressing impacts regarding recreational pressures on the heath. (iv) Historical and archaeological mitigation - consideration for St John in the WILDERNESS church and the surrounding Saxon/Norman/Medieval settlement. (v) Wildlife consideration on site for biodiversity protection and enhancement (net gain). (vi) Primary School - there will be no school within the required 800m "walking neighbourhoods" distance for the majority of the site, so provision will have to be made on-site. (vii) secondary School - Exmouth Community College has no capacity to expand and is currently at or near capacity, so provisions will need to be made with associated contributions from developers. (viii) Community Infrastructure levy considerations. (ix) Affordable housing provision. (x) Net Zero housing

requirements. To ensure economic viability, the costs of any requirement likely to be applied to development should, when taking into account the normal costs of development and mitigation, provide competitive returns to a willing land owner and a willing developer to enable the development to be deliverable. As much of the information regarding the required mitigation (e.g. HRA 30/01/2025) and standards has been provided subsequent to the Allocation of this site on 03/09/2024, the economic viability has not been given consideration therefore the site allocation is currently not justified, effective or consistent with National Policy and is therefore Not Sound. It should be of concern to the LPA that the site is potentially not economically viable as, if so, it is not deliverable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Other sites, which did pass HELAA and were shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Dear localplan,

This is a comprehensive statement on the whole process undertaken with regard to Exmo_20 and is intended to draw your attention to the defects in your methodology. If Exmo_20 in it's present form gets through this Consultation it is my intention to draw all these points to the Inspector's attention at a later stage.

The following key points are a brief summary of the main evidence material which is contained within this document in relation to the EDDC Reg 18 and Reg 19 Consultations.

1. Based on the HELAA Report and the 'Site Selection Methodology' document in effect between May 2022 and December 2024, Exmo_20 should have failed the 'site sifting' stage of the site selection phase. So should not have been put forward for Reg 18, and therefore not available for Reg 19 either.
2. Exmo_20 has 'NEVER' been consulted on as a 'whole site', and is a totally different consideration. Once the decision was made to join Exmo_20a and Exmo_20b together to form Exmo_20 there are numerous other considerations that need to be discussed, yet have not been.
3. At the Strategic Planning Committee (SPC) meeting on the 9th August 2022, the developers presented site 'Land at St Johns' and agreed that ONLY the southern part of Exmo_20 was being put forward with 150 new homes suggested. The developers confirmed that the Northern part of the site was not being put forward for development. It should have been confirmed at this stage that this means that site Exmo_46 was being proposed!!

4. Site Exmo_46 should have been the only site associated with Exmo_20 that was taken forward from this date forward, as identified in all of the documents and evidence put forward for Reg 18.

5. At the SPC meeting on the 6th September 2022, the committee agreed to 'Recommend endorsement of the preferred sites and 2nd choice sites as suitable for consultation'. There is no mention of putting 'REJECTED' sites forward for consultation.

6. At the SPC meeting on the 1st November 2022 the committee agreed that 'Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content'. It is also at this meeting that two new site references Exmo_20a and Exmo_20b are visible on a map. It should be noted that these two new site references have never been discussed or consulted on, either before this meeting or during it. This is six days before the the Reg 18 Consultation starts, and how can two new site references be covered by the statement highlighted in bold above?

7. The main evidence documents for the Reg 18 Consultation dated 7th November 2022 to 15th January 2023 are; The Exmouth Sites - additional information.pdf, the HELAA Report, and the Sustainability Appraisal Report. ALL of these documents identify Exmo_46 as the site to be taken forward to Reg 18 consultation and NOT the Exmo_20 site. It is astounding to note that sites Exmo_20a and Exmo_20b are not mentioned within ANY of these documents, yet somehow are the sites that were taken forward to the Reg 18 Consultation.

8. The Draft Local Plan is the focus for the consultation and all supporting documentation should support this. Yet only Exmo_20b (second choice) that is associated with Exmo_20 is mentioned as the site being proposed within the Draft Local Plan for Reg 18. Also to be noted is the fact that none of the supporting documentation mentions site Exmo_20b (our Exmo_20a)!!

9. Exmo_20a is classed as 'rejected' on the Exmouth map, and you really have to dig down to get to the description on this site (no link from the Draft Local Plan). When you do, it just states that it is a 'rejected site' and has a reference to Exmo_20b. How can the public, and relevant Statutory Bodies be expected to comment on a 'rejected' site. Also how can you comment on a site of this size when there is NO acceptable description supplied? 10. Based on the above, and the main evidence supplied below. Exmo_20 and therefore Exmo_20a and Exmo_20b should NOT have been put forward as part on the Reg 18 Consultation. This means that they could also NOT be part of the allocation process carried out in September 2024. So ultimately CANNOT be put

forward for the Reg 19 Public Consultation. 11. If all of the supporting documentation for the Reg 18 Consultation, including the Site Selection Methodology has been TOTALLY ignored, then why should we believe that the Reg 19 Consultation is going to be any different?

1. INTRODUCTION

I am one of numerous residents within the Exmouth and Budleigh Salterton area who have been frustrated by the total lack of transparency shown by EDDC with regards to the handling of site reference Exmo_20 which has now been put forward for allocation as part of the Reg 19 Public Consultation.

Please find detailed below my concerns relating to the handling of site references Exmo_20, Exmo_46, Exmo_20a and Exmo_20b during the build up to, and within, the EDDC Reg 18 Consultation that ran between 7th November 2022 and the 15th January 2023, and ultimately the build up to the EDDC Reg 19 Public Consultation that started on the 13th February 2025 and due to finish on the 31st March 2025.

2. BACKGROUND

The first time that I heard of this site (Exmo_20 with between 700 to 1000 new homes proposed), was on the 4th September 2024 following the incorrect decision of the Strategic Planning Committee (SPC) meeting on the 3rd September 2024.

This decision by the SPC, was to allocate site Exmo_20a against their own planning officers recommendation (which was not to allocate), along with site reference Exmo_20b, and created site reference Exmo_20.

The point that numerous concerned residents and myself have been making to the SPC since the 4th September 2024 is that we 'the public' have not had an opportunity to discuss/object to this development. However, despite our best efforts via email and in person (numerous public speakers at meetings, including 6 representations at the last SPC Meeting on 4th February 2025 before the Reg 19 Public Consultation started), we have been ignored and told on numerous occasions that we (the public) have been

consulted with regards to these sites. I would like it noted that 'we' do not believe this to be the case.

With regards to site reference Exmo_20 and the other site reference numbers related to the 'Land at St Johns'. Please find detailed below what I understand to be the timeline running up to the EDDC Reg 18 consultation from 7th November 2022 to 15th January 2023, including all relevant document references (evidence).

This information has been found primarily within the documents, minutes, and YouTube videos associated with the Strategic Planning Committee (SPC) meetings between 14th December 2021 and 1st November 2022. The HELAA and Sustainability Appraisal Report information is taken from the documents supplied for the Reg 18 consultation as is the 'Exmouth Sites - additional information' document.

3. EVIDENCE

SPC meeting - 14th December 2021

The Draft Local Plan brought to this meeting does not mention anything to do with 'Land at St Johns' or site Exmo_20.

SPC meeting - 9th August 2022

The Developers Presentation from PCL (3 members), presented the 'Land at St Johns' site and confirmed that they were only proposing the Southern area of the original Exmo_20 for 75 homes initially with the option for another 75 later, so total of 150 homes. They were asked by Councillor Nick Hookway if they were going to develop around the Northern part of the original Exmo_20 site around St John in the Wilderness Church. To which the developers responded (at 3 hours and 56 minutes into the youtube video) that they were 'no longer promoting for development' the Northern part

of the site. Apparently there was some confusion with regards to which site they were referring to. Councillor Jessica Bailey asked what EDDC site reference number they were discussing here (at 3 hours and 51 minutes into the YouTube video) and the response from the developers was ‘I think it is Exmo_20’. This was incorrect and SPC should have been informed that it was Exmo_46, as identified in 6th September 2022, Appendix 2 - Exmouth Amended Version.pdf (see 6th September meeting information below).

SPC meeting - 6th September 2022

From the minutes of the meeting, the following recommendations were agreed.

RECOMMENDATION: That Strategic Planning Committee:

1. Recommend endorsement of the preferred sites and 2nd choice sites as suitable for consultation;
2. Note the likely shortfall in housing sites identified within this committee report'
3. That a report be brought to a future meeting of Strategic Planning Committee to set out options for the weighting of site constraints and assessments to inform future assessment work, post consultation on the draft Local Plan.

Committee Members were in support of the three recommendations.

Within the agenda for the meeting the following was found under item 28 for the site assessment work at Tier 1 and 2 Settlements. The decision was not to discuss every site so recommendation 1 above was applied.

Within the document Appendix 2 - Exmouth Amended Version.pdf, on Pages 31 to 34, Exmo_20 is identified and the important thing to note here is the following description which is copied from the document.

Should the site be allocated? Potential 2nd choice allocation, though following presentation at Committee by agents this is specifically so for Exmo_46. At this stage of plan making work (August 2022) it is not known if all of Exmo_20 is actually now being promoted by the land owner or owners for development but given the presentation to committee and the new call for site submissions we are assuming that active promotion of most of site Exmo_20 is not now occurring.

It is to be noted that the above document is the same as the 'Exmouth Sites - additional information.pdf' which is part of the evidence within the Reg 18 Commonplace site, as described later in this evidence section.

Questions/Statements

1. Only the 'preferred' and 'second choice' sites were mentioned in recommendation 1. Therefore, it was recommended that the 'preferred' and 'second choice' sites were endorsed as suitable for consultation. There is NO mention of 'rejected' sites being suitable or to be taken forward for consultation. SPC meeting - 7th October 2022

Draft Local Plan highlighted the following for 'Land at St John's' on page 72.

Exmo_20 – this land to south of St John's on the eastern side of Exmouth is proposed for proposed for 150 new homes and 0.6 hectares of employment land.

Questions/Statements

1. Based on the Appendix 2 - Exmouth Amended Version.pdf statement identified within the 6th September meeting notes above. Why mention Exmo_20? This should be Exmo_46 not Exmo_20.
2. Exmo_46 should have been used from this date onwards!!
3. This is the start of the confusion surrounding Exmo_20

SPC meeting - 1st November 2022

The SPC approved the following:

RESOLVED:

1. Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content;
2. That the draft Local Plan, as appended to this report and subject to final refinements, for public consultation be endorsed.

The following is the ‘copied’ description taken from the Draft Local Plan presented on the agenda for this meeting. It is taken from the Tracked Changes Version of the draft Local Plan for Consultation which highlighted the following for 'Land at St Johns' on page 80.

Land at St John's (Exmo_20) – this land to south of St John's on the eastern side of Exmouth is proposed for proposed for 150 new homes and 0.6 hectares of employment land.

Note : Exmouth, item 58.pdf shows East Devon Local Plan 2020-2040 - Exmouth- now has Exmo_20a and Exmo_20b.

Questions/Statements

1. Exmo_20a and Exmo_20b have never been mentioned before they suddenly appear on the map under Exmouth item 58.pdf. This map is titled 'East Devon Local Plan 2020-2040 - Exmouth'.
2. There was no discussion in this meeting with regards to this map, despite the fact that it included two new sites that had never existed until now. Why???
3. Again, the addition of TWO new site references six days before the start of the consultation - surely this is in conflict with the Resolved point 1 above starting 'Delegated.....'

Last information on Exmo_20 was at the SPC meeting on 6th September 2022 within the Appendix 2 - Exmouth Amended Version .pdf which highlighted that Exmo_46 was the only part of Exmo_20 being put forward for development.

Draft Local Plan used for both Reg 18 Consultations. ** Note: The first Reg 18 Consultation started on 7th November 2022, so 6 days after the last SPC Meeting identified above **

The following is the 'copied' description from page 69 of the Draft Local Plan to be used in both the Reg 18 consultations.

Land at St John's (Exmo_20 the proposal is to allocate Exmo_20b as shown on the Policies Map) – this land to south of St John's on the eastern side of Exmouth is proposed for proposed for 150 new homes and 0.6 hectares of employment land.

The Policies map in Reg 18 shows Exmo_20a and Exmo_20b. With Exmo_20a identified as 'rejected' and with Exmo_20b identified as 'Second Choice '.

Questions/Statements

1. Does the addition of Exmo_20b in the description above, fall within point 1 of the 'Resolved' section which the SPC approved at the 1st November 2022 meeting? The addition of a new site reference seems more than minor , etc...?
2. Again, why did Exmo_46 not get used here? The HELAA and Sustainability Appraisal reports do not reference Exmo_20a or Exmo_20b, nor does the 'Exmouth sites - additional information' document. ALL of these documents are put forward as evidence as part of the Reg 18 Consultation, and ALL only reference Exmo_46 as the site to be taken forward.
3. Exmo_20a is identified as 'Rejected'. I can understand consultation happening against 'preferred' and 'Second Choice' sites but not 'Rejected'. As a member of the public (if I knew the consultation was taking place that is), I would not comment against a 'rejected' site and for EDDC to claim such a thing is very disappointing.
4. Based on point 3 above, how can EDDC class Exmo_20a as having been consulted on???? Note: During the Reg 18 consultation only 2 members of the public responded to Exmo_20a and only 4 members of the public responded to Exmo_20b. This rather indicates the lack of public awareness of this consultation, and the fact that the larger part of this site was classed as 'rejected'. Especially when you consider that this site is for between 700 to 1000 new homes.

Descriptions of sites Exmo_20a and Exmo_20b put forward within the Reg 18 Consultation.

The following are the descriptions that were provided within Commonplace for the Reg 18 Consultation:

Exmo_20a - REJECTED Originally assessed alongside LP_Exmo_20b - Land at St John's (potential 'second best' allocation – 150 homes), this part of the site has been rejected for development.

Exmo_20b - POTENTIAL 'SECOND BEST' ALLOCATION - 150 homes (based on the reduced site area now being promoted based on the presentation to the Strategic Planning Committee meeting – Aug 9th 2022) and 0.6 hectares of employment land

The site as originally assessed (which also included LP_Exmo_20a) was large scale and as such could meet a lot of the overall housing needs.

It is also well screened and so long as development is predominantly in central and southerly parts of the site then building work should be comparatively unobtrusive (especially noting the overall scale of what could be accommodated).

However, there are built heritage sensitivities associated with the site and more significantly there are significant local levels of biodiversity interest at the site that could be adversely affected by development.

A site promoter shows highway access to the south of the site coming through lengths of Unconfirmed Wildlife Site, which would clearly cause destruction and landscape scale severance of what could be high value habitats (deciduous woodland).

In addition, this access road would use existing residential roads that suffer from localised congestion.

The possible highway suitability would require more detailed and fine-grained assessment should proposals progress.

The site is not identified as a preferred site, but it is suggested that it may be a possible 'second best' choice, though noting significant challenges that the site presents.

At a Strategic Planning Committee meeting, a presentation from agents acting for the/a landowner advocating a much more modest scheme of one field for 75 dwellings, though with potential to also build in an adjoining field to take the total to 150 homes.

We have adjusted second best potential capacity down to 150 dwellings to reflect the landowner's submission.

Questions/Statements

1. The description for Exmo_20a confirms that the site was classified as rejected, so why would anybody think that they needed to consult on this site?
2. Even if the site was put forward as 'preferred' or 'second choice', how would anybody make a sensible comment with regards to this site based on the site description provided?
3. The description for a site of this size (proposed for a minimum of 550 homes) cannot be seen as 'acceptable'. Yet no comments made regarding this or the fact that there is NO supporting information for this site (or Exmo_20b) and only 2 comments received from the public regarding Exmo_20a.
4. Only Exmo_20b is referred to within the Draft Local Plan which is supposed to be the driver for the consultation.
5. As previously mentioned, Exmo_20a and Exmo_20b should never have been created or put forward. Only Exmo_46 should have been put forward. This is evident from the EDDC's own evidence/documentation, meeting minutes and meeting videos. Reg 18 evidence documents to be noted in addition to the above.

HELAA Report November 2022

The HELAA report identifies Exmo_20 as 'probably unachievable', and the site is included in the list of sites within Appendix E(v) 1 Available but not suitable or achievable - Housing sites

The HELAA report identifies Exmo_46 as 'probably achievable if'.

Questions/Statements

1. There is no mention of sites Exmo_20a or Exmo_20b in the whole of the HELAA report apart from them being shown within the interactive map which you really have to dig down to, to even get to see it - do not know when this map was updated with this though.
2. Why has the HELAA report been ignored with regards to Exmo_46?

The Site Selection Methodology document (dated May 2022)

This document was effective from May 2022 until Version 2 was published in December 2024.

This document details the site selection process and the four main stages.

Stage 2 of this methodology is important here as it covers the ‘site sifting’ stage. Where sites must pass certain criteria to be allowed to be considered for stage 3 which effectively means that they can be considered at this point in time for Reg 18 Consultation. The following is a copy of the relevant parts of the Stage 2 Site Sifting criteria from this document.

1.8 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further. Only sites which meet criteria a), b) and c) are carried forward to Stage 3. These criteria are shown in figure 2 below.

Figure 2: Sifting criteria

Sifting criteria Reason a) Site is assessed as 'suitable, available and achievable' in the HELAA

Based on the fact that site Exmo_20 is identified within Appendix E(v)1 of the HELAA report as 'Available but not suitable or achievable'. The site Exmo_20 fails the 'site sifting' criteria for stage 2 as it does NOT meet criteria a).

Questions/Statements

1. Based on the 'Site Sifting' criteria and the HELAA Report information highlighted above. Exmo_20 should have failed the 'Site Sifting' stage, and therefore, NOT have been put forward for Reg 18 Consultation, and ultimately COULD NOT BE AVAILABLE FOR Reg 19 Public Consultation.
2. What is the point of having the HELAA Report and the Site Selection Methodology if EDDC just go ahead and ignore them? the Sustainability Appraisal (SA) report for Reg 18 dated November 2022 - 571 pages

Pages 251 to 268 refers to Exmouth. With regards to references to Exmo_20, Exmo_20 is only being mentioned briefly and the rest of the references are for site Exmo_46.

The following is a copied description on page 253 detailing Exmo_20 and the reason for Exmo_46 being put forward instead.

Site Exmo_20 - Land at St. John's - was originally submitted through HELAA work as a very substantial site on the eastern edge of Exmouth, it is understood, however, that the site overall is no longer being promoted for development by the landowner but the landowner is promoting a southerly part of it for development and this has come in as 2022 call for sites submission and given reference Exmo_46. Site Exmo_46 is assessed, all be it the land owner also advised that land to the west of the submission site may be available for development and the SA assessment work covers the potential of the larger (additional area incorporated to the west) as this forms a proposed allocation for development.

Questions/Statements

1. Similar to the HELAA documents above, there is no mention of sites Exmo_20a or Exmo_20b in the whole of the Sustainability Appraisal Report apart from in the map shown on page 251 - WHY??

2. Based on the fact that the HELAA and Sustainability Appraisal Report both refer to Exmo_46 as the site to go forward for this phase, WHY do Exmo_20a and Exmo_20b even come into existence????

The Exmouth Sites - additional information.pdf

A 60 page document found within the EDDC Reg 18 Commonplace site within the 'List of policy maps' section (which is the last of the 4 proposals under the heading of 'HAVE YOUR SAY ON OUR PROPOSED SITES'). This document can be found by clicking on the 'List of policy maps' icon, then clicking on the 'Exmouth' policy map. This then takes you to the Exmouth policy maps page. At the top of this page there is a 'Check out the following documents' title which provides you with an option to click on the 'Exmouth Sites - additional information.pdf'. If you click on this link you will be supplied with a 60 page document titled 'Appendix 2 Site Selection - interim findings at Tier One and Tier Two settlements'. If you go to page 31 you are presented with the site Details for settlement Exmouth for Site reference number Exmo_20. The description for this site reference number is as follows :

Site reference number: Exmo_20, but also new 2022 call for sites site Exmo_46 that falls within Exmo_20 and by default a larger 2017 submission, site GH/ED/76.

Please note there is no reference to sites Exmo_20a or Exmo_20b within this document.

Pages 31 to 34 of this document detail the site assessment summary etc. for this site. Including the 'Should this site be allocated?' section. This section states the following:

Potential 2nd choice allocation, though following presentation at Committee by agents this is specifically so for Exmo_46. At this stage of plan making work (August 2022) it is not known if all of Exmo_20 is actually now being promoted by the land owner or owners for development but given the presentation to committee and the new call for site submissions we are assuming that active promotion of most of site Exmo_20 is not now occurring.

Questions/Statements

1. Similar to the HELAA Report and the Sustainability Appraisal Report documents above, there is no mention of sites Exmo_20a or Exmo_20b in the whole of this document.
2. Based on the fact that this document along with the HELAA Report and Sustainability Appraisal Report ALL refer to Exmo_46 as the site to go forward for this phase, WHY do Exmo_20a and Exmo_20b even come into existence????

4. CONCLUSIONS

1. Exmo_20 has NEVER been consulted on as a ‘whole site’. It was not put forward as part of the Reg 18 Consultations, and Exmo_20a and Exmo_20b have only been discussed separately. Exmo_20 as a ‘whole site’ was only put forward following the decisions made at the SPC meeting on the 3rd September 2024.
2. Exmo_20 as a ‘whole site’ is a totally different consideration to the sites Exmo_20a and Exmo_20b. The fact that the description within the Draft Local Plan for Reg 19, states that ‘Vehicular access to accommodate modest levels of development, will be allowed for southern site parts from the road ‘Southern Wood’..... Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the North’ . This effectively means that the site will be split into two in anyway, how else can you only have ‘modest’ access via Southern Wood, without stopping the ‘majority’ of the site from connecting to this access point?
3. Based on the HELAA Report (which identified Exmo_20 as ‘available, but NOT achievable or sustainable), and the Site Selection Methodology document (dated May 2022 and not changed until December 2022). Site Exmo_20 should not have passed the Stage 2 ‘site sifting’ phase, and therefore, should NOT have been put forward to Stage 3 which effectively stops the site from being considered for the Reg 18 consultation. This ultimately means that Exmo_20a and Exmo_20b CANNOT be considered as part of Reg 18 Consultation, and ultimately should NOT have been in consideration for discussion at the 3rd September 2024 allocation discussion meeting. Which then means that Exmo_20 CANNOT be put forward for Reg 19 Consultation. Yet somehow these three sites have managed to get through the process. Why have (or bother) with the HELAA

Reports and the Site Selection Methodology, if you are going to COMPLETELY ignore them??

4. Even though Exmo_46 has been identified on numerous occasions since the 9th August 2022 as the only site to be taken forward of those linked to Exmo_20. It has NOT ONCE been mentioned in the various versions of the Draft Local Plan. Exmo_46 should have been used from this date onwards and would have stopped the confusion around this site that has been evident from this day forward.

5. The Appendix 2 - Exmouth Amended Version.pdf presented at the SPC meeting on the 6th September 2022, identifies Exmouth_46 as the site to be taken forward and that active promotion of most of site Exmo_20 is now not occurring. Based on this Exmo_46 should have been put forward to Reg 18 as 'Second Choice', and this should have been the ONLY site taken forward that was linked to Exmo_20.

6. The main evidence documents for the Reg 18 Consultation 7th November 2022 to 15th January 2023 are; The Exmouth Sites - additional information.pdf, the HELAA Report, and the Sustainability Appraisal Report. ALL of these documents identify Exmo_46 as the site to be taken forward to Reg 18 consultation and NOT the Exmo_20 site. It is astounding to note that sites Exmo_20a and Exmo_20b are NOT mentioned within ANY of these documents, yet somehow are the sites taken forward to the Reg 18 Consultation.

7. The HELAA Report, Site Selection Methodology, Sustainability Appraisal Report, and the 'Exmouth sites - additional information pdf' document, all support the INCLUSION of site Exmo_46, and the EXCLUSION of site Exmo_20 from the Reg 18 consultation. However, ALL of the information in ALL of these KEY documents has been ignored and there is no justification been provided for these decisions.

8. The resolution 'Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content' was agreed by SPC at the 1st November 2022 meeting. Yet somehow two new site references Exmo_20a and Exmo_20b (which is more than a minor change) are suddenly introduced without any discussion or descriptions. The only indication of these new sites is within the Exmouth map provided as part of the 1st November 2022 meetings report pack (but again no discussion around the introduction of these new sites). This is six days before the the Reg 18 Consultation starts.

9. On the 6th September 2022, the SPC agreed to 'Recommend endorsement of the preferred sites and 2nd choice sites as suitable for consultation'. There is no mention of putting 'rejected' sites forward for consultation, yet EDDC claim that because they have

received comments on ‘rejected’ sites then they have been consulted on. Why have comments against rejected sites been taken as ‘the site has been consulted on’? Of particular note is the description (or lack of) for site Exmo_20a identified within the main evidence above. 10. Based on all of the evidence supplied above, Exmo_20 should NOT have passed 'site sifting'. Exmo_20a and Exmo_20b should NOT have been put forward for Reg 18 consultation. Therefore, Exmo_20 CANNOT be put forward for Reg 19 Public Consultation!! 11. If all of the supporting documentation for the Reg 18 Consultation, including the Site Selection Methodology has been TOTALLY ignored, then why should we believe that the Reg 19 Consultation is going to be any different?

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.: You will note from the overwhelming evidence above that Exmo_20 is not a legitimate site for allocation and the decisions taken by EDDC Strategic Planning Committee are clearly flawed. I will exercise my right to speak directly to the Inspector should Exmo_20 still be in its present form when the Examination commences.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Plan is not sound because of the inevitable environmental impacts of the large scale Exmo_20 site situated on the very edge of the National Landscape. There will be significant short and long term effects if this proposal is allowed to go ahead. During the construction phase there will be considerable ecological disruption, including increased pollution and disturbance to the wildlife. Thereafter Exmo_20 will have a sustained environmental impact on a continuing and unending basis, traffic will inevitably increase on already overcrowded roads, resource consumption will increase as will waste generation these will all lead to a degradation of the surrounding natural environment. No evidence has been provided that careful evaluation, avoidance and, as a last resort, mitigation has been undertaken to ensure alignment with EDDC's environmental sustainability objectives.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There is no evidence that EDDC has adequately consulted with National Landscapes with regard to Exmo_20 as required by 2.4 of the East Devon Local Plan - Key Supporting Documents 002. It is also noted that, as documented in the referenced document and recorded in the minutes of the Strategic Planning Committee (SPC) meeting of 5/9/2023 that Budleigh Salterton Town Council (BSTC) was not included in the Duty to Co-operate despite EDDC undertaking in their Statemant of Community Involvement (p16) to consult all Town and Parish Councils.... Since the meeting of 5/9/2023 Exmo_20 was determined as "unsuitable" by EDDC and as late as 2/9/2024 the site was scheduled "Not Allocated". Somehow it is now proposed and adopted by the SPC as suitable and "Allocated"! It is patently obvious that a development of this size and impact within a few hundred metres of Budleigh and less

than 2 miles from the centre of the town, located on the edge of the National Landscape should have resulted in detailed and meaningful discussions with both BSTC and the residents of the town.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I don't think you have the right to ask this question. I clearly qualify as below from the Planning Inspectorate Procedure Guide 28/8/2024:

3.10. The right to appear and be heard by the Inspector at a hearing session is limited to those persons defined in section 20 (6) of the PCPA i.e. any person who has made a representation seeking a change to the plan within the deadline set by the LPA for Regulation 19 consultation responses. (This includes anyone seeking a change to the addendum of changes to the plan, if the LPA have submitted one in accordance with the procedure described in paragraph 1.5 above.) The Inspector may invite any other person to attend a hearing session if, in the Inspector's view, their participation will assist in assessing the soundness of the plan. But the Inspector has no power to summon a person to a hearing. In addition to the above I have been trying to be listened to by EDDC for many months without any success at all, therefore wish to speak directly to the Inspector.

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The largest development within the Local Plan (Exmo_20) is located the furthest from the designated Tier 1 town to which it is allocated, resulting in it being adjacent (a few hundred metres) to Budleigh Salterton a Tier 3 town, with it's resultant facilities, which is situated within a designated National Landscape. This policy is not legally compliant as it fails to satisfy a number of the remaining key tests, including those relating to sustainability, environmental impact and the adequacy of infrastructure provision. Furthermore, this land was previously rejected by EDDC's HELAA process as "unsuitable", indicating that it does not meet the necessary criteria for development in terms of environmental considerations and suitability for housing.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Plan is not sound because no consideration has been given to the main town affected by Exmo_20 i.e. Budleigh Salterton. This development fails to adequately address local priorities and needs and must go beyond the scope outlined in the Local Plan. This development would directly contradict POLICY OL05 of the Local plan which sets out to prevent development that would "damage the individual character and identity of settlements". There is significant concern being expressed by residents regarding the adequate protection of the St John in the WILDERNESS church, land and surrounding environment. Furthermore adequate consideration has not been given to the broader area of National Landscape including the Pebblebed Heaths SSSI which requires comprehensive safeguarding. It is essential that EDDC refrains from promoting land for development that has already been rejected by it's own HELAA process which raises significant concerns regarding the suitability of this site for development. The impact of such a large development on a discrete Tier 3 town with limited, and already

pressurised, infrastructure in accomodating such a large increase in population and activity clearly has not been considered. The inclusion of Exmo_20 is clearly in conflict with POLICY PB01 of the Local Plan (Protection of internationally and nationally important wildlife sites), it is not in accordance with the mitigation strategy and therefore SD03 is insound.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is clear that Budleigh Salterton Town Council (BSTC) has not been directly consulted correctly (see the submission made by them). This is despite the fact that Budleigh Salterton is the most proximate town to the proposed main access/egress of Exmo_20 development. BSTC members have made it clear that no time were they involved despite EDDC's commitment made in it's own Staement of Community Involvement (p16). The failure of EDDC to consult with BSTC completely undermines the effectiveness and transparency of the planning process

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I don't think you have the right to ask this question. I clearly qualify as below from the Planning Inspectorate Procedure Guide 28/8/2024:

3.10. The right to appear and be heard by the Inspector at a hearing session is limited to those persons defined in section 20 (6) of the PCPA i.e. any person who has made a representation seeking a change to the plan within the deadline set by the LPA for Regulation 19 consultation responses. (This includes anyone seeking a change to the addendum of changes to the plan, if the LPA have submitted one in accordance with the procedure described in paragraph 1.5 above.) The Inspector may invite any other person to attend a hearing session if, in the Inspector's view, their participation will assist in assessing the soundness of the plan. But the Inspector has no power to summon a person to a hearing. In addition to the above I have been trying to be listened to by EDDC for many months without any success at all, therefore wish to speak directly to the Inspector.

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

These comments are to be included in Chapter 5, Development in Towns and Villages.

The plan is not sound in that the inclusion of Exmo_20 will cause significant harm to the heritage assets at this Saxon/Norman/Medieval settlement in open country. The worst impact will be on the St John in the WILDERNESS church and grounds which is Grade II * listed, Worship, marriages, burials and church community events will not be able to continue in the middle of a building site. It probably would have helped if a single member of the EDDC strategic Development Committee had bothered to visit. Contrary to POLICY HE02

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I don't think you have the right to ask this question. I clearly qualify as below from the Planning Inspectorate Procedure Guide 28/8/2024:

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Plan is not sound because of the inclusion of allocated site Exmo_20. This site did not pass the HELAA test and should be replaced by other sites which are available, achievable and suitable in the HELAA. Exmo_20 would inevitably cause harm to the adjacent Pebblebed Heaths which are designated SSSI/SAC/SPA & NNR due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to HELAA, the Site Selection methodology and Policy PB01 of the Local Plan and not in accordance with the Mitigation Hierarchy which requires the selection of avoidance over mitigation

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having tried repeatedly to get EDDC to listen to my objections to the Plan and failed, I would like to exercise my right to speak directly to the Inspector

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Plan is not sound in respect of proposed site Exmo_20. This site consists of a heavy clay subsoil and has ineffective soakaways which would significantly exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth which is already under additional pressure from the effects of climate change. This is in clear conflict with Policy AR 01B

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)

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Plan is not sound because site Exmo_20 is in conflict with Policy OL09 and Policy PB04 this is because the Habitats Regulation Assessment of 30/01/2025 states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to ... air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The primary access to the site is directly adjacent to the SAC/SPA

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in direct conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors contrary to Paragraph 13.23 of the Local Plan. It would inevitably cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across 210 acres contrary to Paragraph 13.9

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development of Exmo_20 would have a ruinous effect on this open countryside site and the adjacent internationally designated wildlife sites eliminating the "tranquility, wildness and dark skies" which is contrary to Policy OL01

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.: Having tried repeatedly to get EDDC to listen to my objections to the Plan and failed I would like to exercise my right to speak directly to the Inspector

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth (1.9 miles compared with 4.6 miles) making Budleigh the most convenient and accessible town to the site. The services and infrastructure of Budleigh - Doctor - Dentist - Pharmacy - School would be the obvious and preferred choice for any new residents in Exmo_20 and would be wholly overwhelmed. The current population of Budleigh is currently 5,200 people adding 700 houses in this one development could add 2,500 people which would represent an increase of 48%!! In case you are unaware the suggested entry point to Exmo_20 is less than 100 metres from the first houses in Budleigh. This proposal therefore contravenes the Settlement hierarchy and would inevitably lead to the coalescence of Budleigh Salterton and Exmouth directly contrary to Policy OL05 of the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

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2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 was deemed 'available BUT NOT achievable or suitable' in the HELAA report back in November 2022, and therefore not available to be consulted on at Reg 18. The only site associated with Exmo_20 and deemed suitable as 'second choice', was Exmo_46. This site should have been the only one going through to Reg 18. However, for some unexplained reason, this site has been ignored. The validity of Exmo_46 can be confirmed by checking the relevant KEY supporting evidence documents for the Reg 18 consultation, which are the HELAA Report, The Sustainability Appraisal Report and the 'Exmouth sites - additional information' document. The fact that two NEW sites Exmo_20a and Exmo_20b, suddenly appear on maps at the Strategic Planning Committee meeting on the 1st November 2022 is questionable (see the evidence titled 'New sites evidence' with email trail dated 20/03/2025). It is to be noted that these two NEW sites are not mentioned or discussed at this meeting (I have watched the youtube video of the meeting and went through the minutes and documents for this meeting). This is six days before Reg 18 starts, and more importantly these two NEW sites are not mentioned in any of the three KEY evidence reports/documents mentioned above. Taking all of the above into account, the sites Exmo_20a, Exmo_20b and Exmo_20 have no valid reason for being in Reg 18, and therefore should not have been discussed on the 3rd September 2024, which ultimately means that Exmo_20 cannot be put through for Reg 19 consultation. Please see evidence that has been provided alongside this submission. FOR THE — Site Selection Methodology (dated May 2022), the HELAA Report (November 2022), the Sustainability Appraisal Report (dated November 2022) and the 'Exmouth sites - additional information' document, these can be found on the EDDC website.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPF Chapter 3. Site reference Exmo_20 was deemed ‘available BUT NOT achievable or suitable’ in the HELAA report back in November 2022, and therefore not available to be consulted on at Reg 18. The only site associated with Exmo_20 and deemed suitable as ‘second choice’, was Exmo_46. This site should have been the only one going through to Reg 18. However, for some unexplained reason, this site has been ignored. The validity of Exmo_46 can be confirmed by checking the relevant KEY supporting evidence documents for the Reg 18 consultation, which are the HELAA Report, The Sustainability Appraisal Report and the ‘Exmouth sites - additional information’ document. The fact that two NEW sites Exmo_20a and Exmo_20b, suddenly appear on maps at the Strategic Planning Committee meeting on the 1st November 2022 is questionable (see the evidence titled ‘New sites evidence’ with email trail dated 20/03/2025). It is to be noted that these two NEW sites are not mentioned or discussed at this meeting (I have watched the youtube video of the meeting and went through the minutes and documents for this meeting). This is six days before Reg 18 starts, and more importantly these two NEW sites are not mentioned in any of the three KEY evidence reports/documents mentioned above. Taking all of the above into account, the sites Exmo_20a, Exmo_20b and Exmo_20 have no valid reason for being in Reg 18, and therefore should not have been discussed on the 3rd September 2024, which ultimately means that Exmo_20 cannot be put through for Reg 19 consultation. Please see evidence that has been provided alongside this submission. FOR THE — Site Selection Methodology (dated May 2022), the HELAA Report (November 2022), the Sustainability Appraisal Report (dated November 2022) and the ‘Exmouth sites - additional information’ document, these can be found on the EDDC website.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004

Section 33A. Site reference Exmo_20 was deemed 'available BUT NOT achievable or suitable' in the HELAA report back in November 2022, and therefore not available to be consulted on at Reg 18. The only site associated with Exmo_20 and deemed suitable as 'second choice', was Exmo_46. This site should have been the only one going through to Reg 18. However, for some unexplained reason, this site has been ignored. The validity of Exmo_46 can be confirmed by checking the relevant KEY supporting evidence documents for the Reg 18 consultation, which are the HELAA Report, The Sustainability Appraisal Report and the 'Exmouth sites - additional information' document. The fact that two NEW sites Exmo_20a and Exmo_20b, suddenly appear on maps at the Strategic Planning Committee meeting on the 1st November 2022 is questionable (see the evidence titled 'New sites evidence' with email trail dated 20/03/2025). It is to be noted that these two NEW sites are not mentioned or discussed at this meeting (I have watched the youtube video of the meeting and went through the minutes and documents for this meeting). This is six days before Reg 18 starts, and more importantly these two NEW sites are not mentioned in any of the three KEY evidence reports/documents mentioned above. Taking all of the above into account, the sites Exmo_20a, Exmo_20b and Exmo_20 have no valid reason for being in Reg 18, and therefore should not have been discussed on the 3rd September 2024, which ultimately means that Exmo_20 cannot be put through for Reg 19 consultation. Please see evidence that has been provided alongside this submission. FOR THE — Site Selection Methodology (dated May 2022), the HELAA Report (November 2022), the Sustainability Appraisal Report (dated November 2022) and the 'Exmouth sites - additional information' document, these can be found on the EDDC website.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I have tried over many months to get EDDC to listen to the points outlined in this submission without any success at all. I would like the opportunity to present the facts to the Inspector

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: NPPF Chapter 3 Para 16 states that "Plans should be shaped by early, proportionate and effective engagement between plan makers, communities and statutory consultees. This Plan has clearly failed in this obligation. In respect of engaging with communities Exmo_20 was not proposed for Allocation throughout the period of engagement but from the moment it was manoeuvred to be Allocated there has been no opportunity for the local community to engage. Any attempt to discuss this site has been rejected in a high handed manner by the Strategic Planning Committee despite this site being, at times, the only one in the whole of East Devon where representations were being made. Furthermore Natural England as a Statutory Consultee has not been consulted on Exmo_20 despite the site adjoining a SAC/SPA/SSSI. This is a clear failure of EDDC to consult as they are required to by law..

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6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

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5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation Exmo_20 is in conflict with Paragraph 3.30. EDDC has been forced to extend the settlement boundary of Exmouth to include not only the land which it is intended to build on but also the 400 metre buffer zone it is necessary to provide. The nett effect of this desperate move is that there will be houses in Budleigh Salterton that are just yards from houses in Exmouth! Clearly this represents ribbon development in contradiction the the Council's own Policy. The Plan acknowledges that housing cannot be built on the buffer zone but by including it within the settlement coundary it makes it available for other types of development. As a result of this manoeuvring the Plan fails entirely to offer robust protection against the adverse effects of excessive amounts of human traffic on the Pebblebed Heath.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation Exmo_20 is in conflict with Paragraph 3.30. EDDC has been forced to extend the settlement boundary of Exmouth to include not only the land which it is intended to build on but also the 400 metre buffer zone it is necessary to provide. The nett effect of this desperate move is that there will be houses in Budleigh Salterton that are just yards from houses in Exmouth! Clearly this represents ribbon development in contradiction the the Council's own Policy. The Plan acknowledges that housing cannot be built on the buffer zone but by including it within the settlement boundary it makes it available for other types of development. As a result of this manoeuvring the Plan fails entirely to offer robust protection against the adverse effects of excessive amounts of human traffic on the Pebblebed Heath.

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2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy OL01 which states " development will only be permitted where it would not harm the aesthetic and perceptual factors such as «tranquility, wildness and dark skies». The site is distinctive for exactly these three characteristics. It is one of the few remaining areas of dark skies and tranquility here. In addition to the light from the housing development there will be significant additional light pollution due to the significantly increased vehicular activity and the impact of car headlights across the site. The area around St John's in the Wilderness church is characterised by a strong sense of remoteness and tranquility indeed a "wilderness" integral to the Grade 11* listed church and nearby listed houses - Barton House and Wilderness House. It will be impossible to retain this sense of peace and calm with a housing development surrounding it.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy OLO1 which states " development will only be permitted where it would not harm the aesthetic and perceptual factors such as «tranquility, wildness and dark skies». The site is distinctive for exactly these three characteristics. It is one of the few remaining areas of dark skies and tranquility here. In addition to the light from the housing development there will be significant additional light pollution due to the significantly increased vehicular activity and the impact of car headlights across the site. The area around St John's in the Wilderness church is characterised by a strong sense of remoteness and tranquility indeed a "wilderness" integral to the Grade 11* listed church and nearby listed houses - Barton House and Wilderness House. It will be impossible to retain this sense of peace and calm with a housing development surrounding it.

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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.: Allocation of Exmo_20 is in conflict with Paragraph 13.9. There are a great number of mature trees on this site many of which show signs of veteranisation. it will not be possible to mitigate the impact on these trees as they are widespread and interspersed throughout the entire site. Exmo_20 also contains many long established hedgerows all across the site the lengths of which are considerable, the trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Paragraph 13.9. There are a great number of mature trees on this site many of which show signs of veteranisation. it will not be possible to mitigate the impact on these trees as they are widespread and interspersed throughout the entire site. Exmo_20 also contains many long established hedgerows all across the site the lengths of which are considerable, the trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors.

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4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

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2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The allocation of Exmo_20 is in conflict with Objective 8. It will inevitably adversely affect the natural environment and result in the loss of much long-established biodiversity

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in conflict with Objective 8. It will inevitably adversely affect the natural environment and result in the loss of much long-established biodiversity

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy PB04. The Habitats Regulation Assessment (30/01/2025) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA).

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy PB04. The Habitats Regulation Assessment (30/01/2025) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA).

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

- Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Para 12.28. The Habitats Regulations Assessment of 30/01/2025 confirms that there is " currently not sufficient certainty to rule out the adverse effects in integrity in relation to air quality" (East Devon Pebblebed Heaths SAC/SPA). The only realistic access to Exmo_20 is to be the B3179 which would significantly increase the traffic flow on the boundary of the Pebblebed Heaths.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with Para 12.28. The Habitats Regulations Assessment of 30/01/2025 confirms that there is " currently not sufficient certainty to rule out the adverse effects in integrity in relation to air quality" (East Devon Pebblebed Heaths SAC/SPA). The only realistic access to Exmo_20 is to be the B3179 which would significantly increase the traffic flow on the boundary of the Pebblebed Heaths.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: 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.:

- Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with policy TR03. The Local Plan highlights that congestion is a particular problem in Western East Devon and it is evident that Exmo_20 will add significantly to the congestion in and around Exmouth. The only proposed access within Exmouth is a residential cul-de-sac containing 10 houses which leads onto another residential road which in turn leads onto Dinan Way. This is not a sensible way to develop a site for 700 houses. Dinan Way suffers from continual traffic usage due to the ongoing development of many hundreds of houses. In addition to the congestion this site will cause in and around Exmouth and Budleigh Salterton, a significant number of vehicles will be forced to travel towards the M5 and Exeter through the village of Woodbury which is already a traffic pinch point.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with policy TR03. The Local Plan highlights that congestion is a particular problem in Western East Devon and it is evident that Exmo_20 will add significantly to the congestion in and around Exmouth. The only proposed access within Exmouth is a residential cul-de-sac containing 10 houses which leads onto another residential road which in turn leads onto Dinan Way. This is not a sensible way to develop a site for 700 houses. Dinan Way suffers from continual traffic usage due to the ongoing development of many hundreds of houses. In addition to the congestion this site will cause in and around Exmouth and Budleigh Salterton, a significant number of vehicles will be forced to travel towards the M5 and Exeter through the village of Woodbury which is already a traffic pinch point.

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.: Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 is in conflict with Policy AR01 (B). The site sits upstream from Exmouth on the main rainwater catchment area of Withycombe Brook, the soil is heavy clay, thus making soakaways ineffective and the land is often waterlogged. Building on this steep site will significantly exacerbate already identified flood risks through the lower-lying land around Withycombe Village road already an identified flood risk.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmo_20 is in conflict with Policy AR01 (B). The site sits upstream from Exmouth on the main rainwater catchment area of Withycombe Brook, the soil is heavy clay, thus making soakaways ineffective and the land is often waterlogged. Building on this steep site will significantly exacerbate already identified flood risks through the lower-lying land around Withycombe Village road already an identified flood risk.

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.: Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 is in conflict with Para 3.34, putting aside the fact that this site is in fact an extension to the town of Budleigh Salterton, the nearby Tier 1 settlement of Exmouth does not have sufficient infrastructure for the existing population let alone another 1500 - 2,000 people. The proposed development will not add another doctors' surgery, dentist, pharmacy or hospital all of which are desperately need now. The current levels of educational provision are inadequate as can be seen by the number of children who currently have to travel to Cranbrook for secondary school.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmo_20 is in conflict with Para 3.34, putting aside the fact that this site is in fact an extension to the town of Budleigh Salterton, the nearby Tier 1 settlement of Exmouth does not have sufficient infrastructure for the existing population let alone another 1500 - 2,000 people. The proposed development will not add another doctors' surgery, dentist, pharmacy or hospital all of which are desperately need now. The current levels of educational provision are inadequate as can be seen by the number of children who currently have to travel to Cranbrook for secondary school.

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.: Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of

"consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with para 3.2. It will increase the number of car journeys people need to undertake and will significantly increase the length of these journeys. The housing is proposed at the southern edge of the site whereas the only access and ingress into the site is at the very northern edge of the site where it joins the Pebblebed Heaths (SAC/SPA/SSSI). Because of the mandatory 400 metre buffer zone to the Pebblebed heath (one of only three in the whole of Europe) there will be a minimum km drive to access the site from the main road, km of driving just to get home and back! From the main road there is a further 7km drive to the centre of Exmouth. Exmo_20 would result in a large increase in car journeys and more cars travelling more miles.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with para 3.2. It will increase the number of car journeys people need to undertake and will significantly increase the length of these journeys. The housing is proposed at the southern edge of the site whereas the only access and ingress into the site is at the very northern edge of the site where it joins the Pebblebed Heaths (SAC/SPA/SSSI). Because of the mandatory 400 metre buffer zone to the Pebblebed heath (one of only three in the whole of Europe) there will be a minimum km drive to access the site from the main road, km of driving just to get home and back! From the main road there is a further 7km drive to the centre of Exmouth. Exmo_20 would result in a large increase in car journeys and more cars travelling more miles.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: 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.:

- Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy HE02 - development of the size proposed surrounding St Johns in the WILDERNESS church (grade 2* listed) will destroy the remote and tranquil setting of this medieval building. The drawings submitted at the Allocation meeting completely ignored the presence of the church and it's historic graveyard.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy HE02 - development of the size proposed surrounding St Johns in the WILDERNESS church (grade 2* listed) will destroy the remote and tranquil setting of this medieval building. The drawings submitted at the Allocation meeting completely ignored the presence of the church and it's historic graveyard.

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.: Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 is at direct variance with EDDC's own policy TR01 in that it is predicated on walking or cycling the 4.2 miles to the centre of Exmouth and will socially divide all those without access to cars.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmo_20 is at direct variance with EDDC's own policy TR01 in that it is predicated on walking or cycling the 4.2 miles to the centre of Exmouth and will socially divide all those without access to cars.

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.:

- Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived Plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy TR01, it is 4.2 miles from the centre of Exmouth without any public transport connections and no viable way of creating such connections. It is unconceivable that people will walk or cycle UP a hill with this gradient to then return the 4.2 miles to the shops schools, healthcare and facilities they need. Studies cited in the Local Plan claim that most people will walk if their destination is within 0.5 miles, beyond 1.0 miles cars are the dominant form of transport, beyond 2.0 miles journeys on foot are rare. This development with it's only access will clearly breach EDDC's own Policy TR01.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy TR01, it is 4.2 miles from the centre of Exmouth without any public transport connections and no viable way of creating such connections. It is unconceivable that people will walk or cycle UP a hill with this gradient to then return the 4.2 miles to the shops schools, healthcare and facilities they need. Studies cited in the Local Plan claim that most people will walk if their destination is within 0.5 miles, beyond 1.0 miles cars are the dominant form of transport, beyond 2.0 miles journeys on foot are rare. This development with it's only access will clearly breach EDDC's own Policy TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: 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.:

- Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived Plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in strict conflict with policy 11.6, it is not within 800 metres of any key services and facilities. Any facilities that are built will not reduce the need for accessing Exmouth Town centre despite the 4.2 mile car journey. Vacuous undertakings were made by potential developers suggesting they would build infrastructure but the recent development at Cranbrook shows this will not happen.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in strict conflict with policy 11.6, it is not within 800 metres of any key services and facilities. Any facilities that are built will not reduce the need for accessing Exmouth Town centre despite the 4.2 mile car journey. Vacuous undertakings were made by potential developers suggesting they would build infrastructure but the recent development at Cranbrook shows this will not happen.

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.: Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Allocation of Exmo_20, against the advice of their professional Officers, is in clear and obvious conflict with Para 2.6. Exmo_20 is not at all modest, unlikely to be sensitively planned and is in effect a "comprehensive development scheme" on the outskirts of Budleigh Salterton.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Allocation of Exmo_20, against the advice of their professional Officers, is in clear and obvious conflict with Para 2.6. Exmo_20 is not at all modest, unlikely to be sensitively planned and is in effect a "comprehensive development scheme" on the outskirts of Budleigh

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.:

- Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 was allocated by Councillors against the advice of Officers despite there being no viable access for the 1500 cars that will use it. Following Allocation an informal discussion was held with Devon CC who limited access to the north eastern side of the site which is 4.2 miles from the centre of Exmouth (the Tier 1 town with which it is associated) but only 2.2 miles from Budleigh Salterton a tier 3 settlement only 2.2 miles away. Clearly Budleigh with none of the required infrastructure will be the nearest point for any new residents. The access arrangements proposed by DCC will lead the new inhabitants inevitably into Budleigh rather than travelling twice the distance to Exmouth. Despite the sprawling growth of Exmouth over recent years the two towns are currently separate in terms of provision of services but this development would merge the two with residents living in one town reliant on the other for services and infrastructure. Clearly a conflict with policy OLO5.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmo_20 was allocated by Councillors against the advice of Officers despite there being no viable access for the 1500 cars that will use it. Following Allocation an informal discussion was held with Devon CC who limited access to the north eastern side of the site which is 4.2 miles from the centre of Exmouth (the Tier 1 town with which it is associated) but only 2.2 miles from Budleigh Salterton a tier 3 settlement only 2.2 miles away. Clearly Budleigh with none of the required infrastructure will be the nearest point for any new residents. The access arrangements proposed by DCC will lead the new inhabitants inevitably into Budleigh rather than travelling twice the distance to Exmouth. Despite the sprawling growth of Exmouth over recent years the two towns are currently separate in terms of provision of services but this development would merge the two

with residents living in one town reliant on the other for services and infrastructure. Clearly a conflict with policy OLO5.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mrs Dorothy Heath

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Potential harm to the Pebblebed Heaths is a huge risk and is contrary to Policy PB01, and would fragment an important wildlife corridor (see Para 13.23 of the plan). Threat to well established woodland and habitats is detrimental to the environment (para 13.9 of the plan). It poses a threat to the tranquility, wildness and dark skies in the area, which are a major natural asset (contrary to Policy OL01) There is also a risk of flood risk as the proposed development is on Exmouth's main water catchment area. (Policy ARO1B). The development will lead to a huge increase in traffic and the use of cars for local journeys. It is unrealistic to think that most people will rely on cycling, walking or even public transport. (Paras 11.2, 11.6 and Policy TR01). Not only is this in contravention of local policies on sustainability, it also presents an increased risk of accidents and air pollution, especially in the area around Southern Wood which already has problems arising from excessive traffic on Meadow View Road. Given its proximity to Budleigh, many people will doubtless wish to use Budleigh infrastructure, which would result in urban sprawl/coalescence of two separate communities, which is contrary to Policy OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not use Southern Wood as an access site - it is totally unsuitable for this purpose. Reduce the size of EXMO_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mr David A Heatherington

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: the main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient and accessible town. The services and infrastructure of Budleigh would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the tranquillity wildness and dark skies of the countryside which is contrary to POLICY OL01 Exmo _20 will be on heavy clay subsoil with ineffective soakaways, and would exacerbate the already identified downstream floodrisk along Withycombe brook through Exmouth, which is already beyond its design capacity EXMO_20 would increase the need for car travel and increase traffic congestion. People would need to travel much further than 800m to existing key services and facilities. The site is too far and too steep for normal foot traffic and cyclists

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christina Hellier

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jessica Hunter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

...Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

...Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

...The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality(East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

...Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE 02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

...Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

...The main access point to Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Amanda Jackson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I would like to put forward my views regarding this housing development.

Exmouth is being built upon from all angles : Dinan Way Development and Road. The Curlews. Plumb Park. Orcombe Gardens. Rolle College Campus. Do we really have to build more? This new development will encroach on Green Belt/National Landscape. It will damage the natural landscape of the Pebblebed Commons, and encroach on the beautiful tranquil, and rural environment of Castle Lane and Littleham Churchyard and surrounding fields. This area has always been a quiet and safe route for walking and cycling (and an area to get away from everything within a stone's throw of the town).

I attended the Bloor Homes Consultation at Bidmead Community Centre (I would hope that you did, too?). I saw the plans in full, talked to Bloor Homes and Clinton Devon Representatives. Of course, they all presented this very positively from their point of view. However, nothing will convince me that this development is either desirable, sustainable or necessary. The idea that all the run-off water from the estate will be channelled into Littleham Brook is frankly laughable! Have they looked at the brook recently, and checked the health of the water course? I have been visually (and photographically) been monitoring this stream for over 30 years , and have watched it descend from a lively stream, where you could happily paddle with children, to a dirty stream with indeterminable brown substances rolling down along it. It used to support fish and kingfishers - but I have seen neither for over 6 years now (since the development in Douglas Avenue, when the fields were dug up for drainage, and trees removed). I have video evidence of all this. For the whole of 2024 it was impossible to walk up Maer Lane / Gore Lane without dodging sewage on the road, sewage tankers and the smell of sewage. If we are struggling to look after our sewerage and drainage systems already, how much more pressure will be put on an already failing SWW?

With only one exit onto Salterton Road, this will have a dramatic effect on people travelling to and from Budleigh Salterton. The Knowle turning onto Budleigh road is already difficult to navigate at certain times of day. Imagine the extra number of cars on the road, if each of the 410 houses has just one car! This development will ruin the ambiance of Exmouth, as being unusual in being both a rural and a coastal community. This is driving our farmers out. Where will all the bats, foxes, badgers and deer, that currently live and roam in these areas, go? Will people be happy to have badger thoroughfares running through their gardens?

Fighting for a good quality of life in Exmouth is very stressful these days...as all the things we take for granted are being eroded. We are being hit on both sides. If these changes keep on occurring, then people will no longer seek to come on holiday to Exmouth, and local people will want to leave... Please stop the despoilation of our unique environment before it is too late. Once an area is concreted / tarmacked over, THAT IS IT

Full name: Jonathan James

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main point of Exmo_20 is much closer to Budleigh Salterton than Exmouth, making Budleigh the easiest town to use. The services of Budleigh would be the choice for residents of Exmo_20 to use putting pressure on Doctors, School, High Street, Beach etc. This undermines the settlement hierarchy and would lead to coalescence of Budleigh Salterton and Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, suitable and achievable in the HELAA.

Exmo_20 is also contrary to POLICY TR01, in that it is too far and too steep from any town centre to use walking or cycling as their choice of transport.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to hear valid arguments for and against the development.

Full name: Katie James

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via the B3179

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Simon James

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Furthermore, Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christina James

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not proceed with exmouth_20b. Exmouth has already seen massive development and infringement on green spaces, these need to be protected. There are areas of brown field sites in the town that would align much more closely with the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Nicola James

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 I am appalled at how much land will be lost in an area that is unspoilt. Access on to roads will be very dangerous, people coming to Exmouth to visit (ie the tourist industry we rely on so much) will think they are still in their cities and towns not to mention the infrastructure which is already collapsing and Dinan Way Goodmores Estate has just added to that problem although the original plans showed a supermarket and there was talk of a school. Think of the view people will see when they enter the Donsn Way off the new roundabouts rows and rows of houses shadowed by ugly flats which are already a blight on the landscape! The houses have not been built in character with Exmouth so now they add to the style of Byron Way etc which is more Crawley!! Our beautiful town with its lovely buildings and country lanes is being swallowed up and nobody is considering the fact we cant reverse this once it happens. I worry nobody will come here they will go to Budleigh or Sidmouth. Please don't destroy it. If you have to provide more homes do it tastefully with smaller developments and consider the impact it has on the people already living here.

Full name: Louise Jamieson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan or reduce the size of Exmo_20,

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

? Revert to Exmo _20b as previously proposed,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Polly Jeanneret

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary

to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jane JENKINS

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO_20 , would cause huge and irreversible damage to the pebble bed heath land and is in contrast with current policy . The surrounding area will be unable to cope with the increased traffic , let alone the infrastructure which is buckling under the current demands without increasing it . This is billed as an Exmouth development, but is infinitely closer to Budleigh, which is already under stress , the sewerage problem alone is of nightmare proportions .

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove

EXMO_20 from 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)

Full name: Jessica Johnson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- Contrary to Local Plan Policy PB01: The development should be relocated to an alternative site to avoid harm to the Pebbled Heaths (SAC/SPA).
- Loss of tranquillity and natural beauty: Exmo_20 would destroy the “tranquillity, wildness, and dark skies” of the countryside, which conflicts with Policy OL01.
- Environmental damage: The development would fragment habitats and destroy wildlife corridors, harming veteran trees and species-rich hedgerows—contrary to Paragraphs 13.9 and 13.23 of the Local Plan.
- Failure to meet air quality standards: The Habitats Regulations assessment (30.01.25) confirms that adverse effects on air quality cannot be ruled out, conflicting with Policies OL09 and PB04.
- Impact on heritage site: Exmo_20 would adversely affect St John in the Wilderness, a Grade II listed church and churchyard*, significantly altering its peaceful setting—contrary to Policy HE02.
- Increased flood risk: The site is on the main rainwater catchment for Withycombe Brook, on heavy clay subsoil, making soakaways ineffective and exacerbating flood risks—contrary to Policy AR01B.
- Traffic congestion and sustainability concerns: The development increases car dependency and traffic, as it is over 800m from key services, making walking and cycling impractical—contrary to Policy TR01 and Paragraphs 11.2 and 11.6.
- Encroachment on Budleigh Salterton: The site is closer to Budleigh Salterton than Exmouth, leading to urban sprawl and merging the two areas—contrary to Policy OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

This development should be modified to remove Exmo_20 from the Local Plan. This will prevent significant environmental harm, preserve the integrity of protected landscapes and heritage sites, mitigate flood risks, ensure sustainable transport planning, and prevent urban sprawl between Exmouth and Budleigh Salterton. The exclusion of Exmo_20 will ensure alignment with Policies PB01, OL01, HE02, AR01B, TR01, and OL05, contributing to a more sustainable and resilient development strategy.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jonathan Jones

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Carolyn Jones

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Philip Jones

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to BudleighSalterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA.

Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan, or reduce the size of it significantly. Do not assess the site via B3179, consider alternative access routes. Do not access the site via Southern Wood.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: philip jones

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site for Exmo 20 for housing allocation should be selected one which is deemed available, achievable & suitable in the HELAA. EXMO 20 would cause harm to the adjacent Pebblebed Heaths (SSI/SAC/SPA/NNR). Developing Exmo 20 is contrary to Policy PB01 of the local plan, and not in accord with the mitigation strategy. Exmo 20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2..

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo 20. Do not access the site from B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Dave Jones

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Not compliant with the following:

Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1, SD10 and SD11 development from the Local Plan. South West Water demonstrably cannot be trusted to address the issues and even if they try, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, and add to sewage pollution of local rivers, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The sewage situation is so out of control it's actively harming local people and the natural environment. Allowing more development before this is fixed is completely unacceptable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy does not take into account the already acknowledged failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: EDDC has completely failed to act upon feedback given by local people and parish councils.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mary-Jane Jones

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development at Exmo_20 should be located elsewhere to cause no harm to the Pebblebed Heaths. It would destroy the 'tranquility, wildness and dark skies' of the countryside. It would isolate habitats, destroy wildlife corridors, and cause detriment to irreplaceable habitats, veteran trees and species rich hedgerows across the site. Air quality in the area may be at risk, particularly due to the increase in car travel and traffic congestion resulting from such an increase in population from the proposed development. Exmo_20 is on the main rainwater catchment area of Withycombe Brook and could increase the flood risk at the lower end of the site and through Withycombe. Paragraph 11.2: It is isolated; people would need to travel nearly 1km to existing key services and facilities. It is too far and steep from the town centre for people to walk or cycle - they will use cars. The main access point to Exmo_20 is closer to Budleigh Salterton than Exmouth so that Budleigh would be the obvious choice for residents for goods, services, infrastructure and leisure. (Don't think the residents of Budleigh will be very pleased).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Peter Julian

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc.)would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

Exmo_20 would increase the need for car travel, contrary to Fig 7 _ the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Do not access the site via the B3179
2. Revert to Exmo_20b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Louise kane

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This development is much closer to budleigh salterton than Exmouth, and would significantly increase the population of a small town. Budleigh has limited facilities: schools, doctors, parking, not to mention a huge overloading of an antiquated sewage system, which is resulting in pollution to the local area. The coalescence of budleigh and Exmouth is contrary to POLICY OL05 of the local plan.

EXMO 20 would cause harm to the adjacent Pebblebed Heaths (SSSi/SAC/NNR). EXMO 20 is contrary to POLICY PB01 of the local plan, and not in accordance with the mitigation strategy.

EXMO20 would cause harm to St John in the Wilderness Grade II listed church and churchyard, drastically altering the current rural setting for worship and burials. This is contrary to policy HEO2.

EXMO 20 would have a detrimental effect on the adjacent designated wildlife sites and would destroy the “ tranquility, wildness and dark skies” which is contrary to policy OL01.

EXMO20 would be in conflict with strategic nature area 368, and this is contrary to para 13.23 of the local plan and para 13.9.

EXMO 20 is in conflict with Policy OL09 and PB04, as the habitats regulations assessments states there is not sufficient certainty to rule out adverse effects in integrity in relation to air quality in east Devon

Further development on heavy clay soil, with ineffective soakaways, would exacerbate the already identified downstream flooding risk along Withycombe Brook. Any water would also likely run towards Budleigh Salterton and the already unstable cliffs which are constantly falling.

The location of EXMO 20 is not within walking distance of either Budleigh or Exmouth and both towns would need to be visited by cars. Neither towns are accessible on foot; the roads are fast B roads with new pavements, and not particularly suitable for cyclists. There is currently not enough parking in Budleigh for the current population, and this is exacerbated during the summer months when visitors come to the beach. Locals without parking spaces on their properties are often unable to park during the summer months due to visitors parking on residential streets all around Budleigh. The LORP has also attracted visitors from around the area and further afield, which has resulted in even more cars in the area. The EXMO20 access point is directly into the B3179 which is the main route into Budleigh. This is a fast road, and would also impact Ting Tong, Woodbury Common and Woodbury. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO 20 from The local plan. This site is not suitable, the local area cannot cope with an increase in population, we do not have the amenities or facilities to cope with this increase. Perhaps consider a much smaller development in the area with affordable housing for local people.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Robert Keast

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: the infrastructure, in Exmouth is already overloaded, almost everything from Doctors and Dentists to sewerage and roads is at breaking point, the proposed number of additional dwellings will lead to overloading of sewers, roads and services. These need to be upgraded/updated to accommodate existing residents, and not grab the money from developers and run.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: see previous comments 3(b)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(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.: see comments 3(b)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Susan and Charles Keate

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Linda Keefe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Andy Kennedy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To have our objections heard

Full name: Anne Killoran

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. We know from experience that they seem to run out of money before the 'affordable' homes are built as on Goodmores Farm so the town is deprived of much needed social housing The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

This location would have only one access and exit road (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

EDDC are. It considering the pressure this new estate would have on our infrastructure You know that the Sewage system is broken and SWW are not addressing the problems

we have at the moment and are not talking about building any new facilities to cope with any new housing estates All this sewage will pumped out to Sea Not a great way to promote our beautiful coastline I believe EDDC have a duty to safeguard our landscape and this new proposal is not only going to devastate an area of natural beauty but also put untold pressure on our Doctors, Dentists and all the other services we need

Full name: Graham Kingham

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Damage to pebble-bed heaths and wild life. By developing Exmo 20 is contrary to policy PB01 of the local plan and not in accordance with the mitigation policy. This plan makes a mockery of having a local structural plan every ten years if it is being over ridden. Exmo 20 would destroy the wild life habitat and dark sky's contrary to policy OL01 This will also fragment and isolate habitats and alter wildlife corridors, having been reinstated to shrub land recently. Paragraph 13.23 Local plan. There is a conflict between policy OL09 and PB04 regarding air quality. St John's church is a grade II listed church and church yard a restful peaceful place that means a lot to the worshippers. Exmo 20 will alter this environment contrary to Policy HEO. The water catchment area north of Exmouth is heavy clay, making soakaways ineffective and as a result of building, flooding around Withycombe Policy ARO1B This area is not served by any major roads or transport hubs making car travel a major source of transport. In conflict with paragraph 11.6 and 11.2 As this is nearer Budleigh Salterton the infrastructure of the town is not suitable, small high street, very limited parking. No room for expanding either doctors or dentists. Daily sewage spills into the sea, a claim is being presented to SWWater. Schools are limited and in need of repair. there is a danger of the two towns merging. Contrary to Policy OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from this area. Continue with the new town on the east of Exeter as per the local plan. FULL TOWN development will provide parking, schools doctors, dentists and so on.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ellie Kinnear

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development at Exmo20 should be located on an alternative site the current location will cause harm to the much treasured and protected Pebblebed Heaths (SAC/SPA) The Exmo 20 development proposal is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy Developing EXMO20 would be detrimental to wildlife habitats would be isolated and corridors destroyed This is contrary to Paragraph 13.23 of the Local Plan The habitats would be irreplaceable species rich hedgerows and veteran trees destroyed contrary to Paragraph 13.9 of the local plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Ideally remove Exmo 20 from the local plan failing this revert to the previous proposals for Exmo 20 do not access site via B3179 or via Southern wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This is such an important issue and I feel as many people as possible should take an active part in listening to the decision making and suggestions so huge mistakes are not made and we do not destroy our countryside unnecessarily

Full name: Jane Kinnersleyq

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh Salterton its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh Salterton and Exmouth, contrary to OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmouth 20 and find a way to access it from the south NOT via the B3179

Full name: Jane Kinnersleyq

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo 20 is in conflict with policy SP01. Exmo 20 is completely detached from Exmouth and therefore cannot be considered to be a development in a Tier 1 town

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo 20b as previously proposed

Full name: Tom Klampfer

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to BudleighSalterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the

already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Harry knee

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

- An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

- Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HEO2. Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

- Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook

through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via southern wood

Reduce the size of the site

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Karen Knight

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmouth_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Health (SAC/SPA). Developing Exmouth_20 is contrary to POLICY PB01 of the local plan and is not in accordance with migration strategy. Ex,o_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2.

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 Exm0_20 from Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Kurowski

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point for Exmo_20 is much closer to Budleigh Salterton than it is to Exmouth, so Budleigh Salterton will be the most convenient and accessible town for the residents of Exmo_20. So the preferred choice of services and infrastructure (High Street shops, doctors, school, beach etc) for residents of Exmo_20 will be Budleigh Salterton. This undermines the settlement hierarchy and would mean that Budleigh Salterton and Exmouth would coalesce, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church - where it would erode the existing attractive rural setting for worship and burials . This is contrary to POLICY HE02.

Exmo_20 will have a seriously detrimental effect on this open countryside site and the adjacent internationally designated wildlife site (the highest designations - SSSI/SAC/SPA/NNR) and would eliminate the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

The development of Exmo_20 is in conflict with the Strategic Nature Area 368, and would fragment and isolate habitats, destroying wildlife corridors which is contrary to PARAGRAPH 13.23 of the Local Plan. This would cause harm to the irreplaceable habitats, veteran trees and species rich hedgerows which exist across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to ... air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

POLICY PB04 states that to help preserve the integrity of the East Devon Pebblebed Heaths on account of the potential impacts of predation of birds by domestic cats, direct recreational disturbance, dog related impacts and urban effect impacts, new dwellings and tourist accommodation or other developments that may result in unacceptable impacts will not be permitted on or within 400 meters of the Pebblebed Heaths - Exmo_20 is within 400m meters of the Pebblebed Heaths.

The development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth - this is already under pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and would increase traffic congestion, in conflict with PARAGRAPH 11.2. Its isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far, too steep, and too dangerous (no pavements on a winding narrow road) for potential residents to reach any town centre using walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access any new development site, such as Exmo_20, via the B3179

Remove Exmo_20 from the plan as it is far too big for the infrastructure in the area, and will have detrimental impact on the adjoining East Devon Pebblebed Heaths NNR.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Penny Kurowski

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point for Exmo_20 is much closer to Budleigh Salterton than it is to Exmouth, so Budleigh will be the most convenient and accessible town for the residents of Exmo_20. So the preferred choice of services and infrastructure (High Street shops, doctors, school, beach etc) for residents of Exmo_20 will be Budleigh. This undermines the settlement hierarchy and would mean that Budleigh and Exmouth would coalesce, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade 11* listed church - where it would erode the existing attractive rural setting for worship and burials . This is contrary to POLICY HE02.

Exmo_20 will have a seriously detrimental effect on this open countryside site and the adjacent internationally designated wildlife site (the highest designations - SSSI/SAC/SPA/NNR) and would eliminate the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

The development of Exmo_20 is in conflict with the Strategic Nature Area 368, and would fragment and isolate habitats, destroying wildlife corridors which is contrary to PARAGRAPH 13.23 of the Local Plan. This would cause harm to the irreplaceable habitats, veteran trees and species rich hedgerows which exist across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to..air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

POLICY PB04 states that to help preserve the integrity of the East Devon Pebblebed Heaths on account of the potential impacts of predation of birds by domestic cats, direct recreational disturbance, dog related impacts and urban effect impacts, new dwellings and tourist accommodation or other developments that may result in unacceptable impacts will not be permitted on or within 400 meters of the Pebblebed Heaths - Exmo_20 is within 400m meters of the Pebblebed Heaths.

The development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth - this is already under pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and would increase traffic congestion, in conflict with PARAGRAPH 11.2. Its isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far, too steep, and too dangerous (no pavements on a winding narrow road) for potential residents to reach any town centre using walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Do not access any new development site such as Exmo_20 via the B3179

Remove Exmo_20 from the plan it is far too big for the infrastructure in the area, and will have detrimental impact on the adjoining East Devon Pebblebed Heaths NNR.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Graham Lance

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: *

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to

PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

* The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to

POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY

ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Full name: Emma Lander

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Mr Nicholas Larkin

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: *

The development proposed could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to Policy OL01 * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich in hedgerows across the site, contrary to Paragraph 13.9 * The Habitats Regulations assessment (30/01/25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with Policy OL09 and Policy PB04. * "Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. it would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with Policy ARO1B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. this is contrary to Policy TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, school, beach and the like) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to Policy OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: * Remove / reduce the size of Exmo_20 * Do not access the site via the B3179 * Do not access the site via Southern Wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Barry Charles Laver

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is the major proposal towards Exmouth's housing target and should not extend anywhere near the B3179. The beauty of the countryside, far from being protected, would be completely lost and fail to preserve the separate identities of Exmouth and Budleigh Salterton contrary to POLICY OL05 of the LocalPlan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20 and do not allow access from the B3179

Full name: Frances Leaning

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Charlotte Lemon

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is closer to Budleigh Salterton than Exmouth. This would make Budleigh its most convenient and accessible town. Infrastructure and services in Budleigh would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. The over stretched infrastructure, facilities and services is not fit for purpose at present.

Exmo_20 would harm the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the site selection methodology and POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at St John in the Wilderness Grade 2 listed church, eroding the attractive rural setting for worship and burials. The heritage assets are Saxon, Norman and Medieval. This is contrary to POLICY HE02.

Exmo_20 would cause detrimental effect on the open countryside and designated wildlife sites nearby. This would eliminate the “tranquility, wildness and dark skies” which is contrary to POLICY OL01.

Exmo_20 would increase the need for car travel. It will increase traffic congestion on an already dangerous and unsafe road. The increase in traffic connections is in conflict with paragraph 11.2. The isolated location provides unsustainable development as

residents would need to travel further than 800m to existing key services and facilities contrary to paragraph 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Exmo_20 is in conflict with POLICY OL19 and PB04 as the Habitats Regulations Assessment states there is currently “not sufficient certainty to rule out adverse effects in integrity in relation to air quality”. the main site access proposed is opposite SAC/SPA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan. Do not access the site via the B3179 or by Southern Wood.

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.: All of the above.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Maureen Lister

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is closer to Budleigh Salterton. This would be a disaster for Budleigh which does not have the services or infrastructure for more people. It would lead to Budleigh and Exmouth becoming one conurbation which would go against the differing preferences of residents in both areas. It would conflict with the POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan, or at least reduce its size.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Melinda Lock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: SSW cannot cope with the new developments already, as the past 2 years have proved with burst pipes and sewage spills into river and sea. The B3179 is already a dangerous road and it would be madness to build a large development with hundreds of cars accessing it.

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.: Do not build!

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Same as above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not build!

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Do not fill in the gap between Budleigh and Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Stephen Lofthouse

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Kathleen Long

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmouth_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. . Exmouth_20 would destroy the 'tranquillity, wildness and dark skies' of the countryside, which is contrary to POLICY OL01. . Developing Exmouth_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. . The Habitats Regulations assessment (30.01.25) confirms that there is 'currently not sufficient certainty to rule out adverse effects in integrity in relation to .. air quality (East Devon Pebblebed Heaths SAC/SPA). Exmouth_20 is in conflict with POLICY OL09 and POLICY PB04. . Exmouth_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. . Exmouth_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. . Exmouth_20 would increase the need for car travel and increase traffic congestion in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1. . The main access point to Exmouth_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OLO5 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Catherine Lord

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Raymond Lovett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The large number of houses built this close to the Pebble Bed Heath protected site would lead to an increase of wandering domestic pets and hence the loss of ground nesting birds and small rodents. I have spent nearly 25 years volunteering with the RSPB to keep the area wildlife friendly.

Full name: Lucinda

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement Hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmented and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA) such that the plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay substitute with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lucinda

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to policy OL01. The development would be in conflict with the Strategic Nature Area 368, fragmented and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. Development of Exmo_02 on heavy clay substitute with ineffective soakaway, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7- the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Gabrielle M Lyne

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20

I vigorously object to the plan to build a large number of houses on this area of land my reasons are listed below:-

1. East Devon is an area of outstanding natural beauty, putting an urban spread on these fields will kill the beauty of this land.

2. More importantly the drainage of this area into a brook going through Withycombe will cause more flooding to the area below the new build section. This is a conflict to Policy number:- ARO1B

3. The sewage system in and around Exmouth is already overloaded this will cause more problems with sewage drainage which is already difficult to resolve.

4. There is a huge amount of Wildlife in this area destroying the Hedgerows and fields is in conflict with Policy OL01 & 13.9

5. The proposed new development is near a unique listed Church and Graveyard which is a perfect area for peace and contemplation which is unusual in this world.
Developing near here will be in conflict with:- Policy HE02

6. The infrastructure needed to support this new development will destroy the surrounding area as the roads are too narrow and winding and take the traveller through small villages. The council says people can walk or bike to areas where there are shops, doctors, etc. They will not as it is far away from the central town of Exmouth up a very long hill consequently people living in this new area will go in their cars causing more congestion on the surrounding roads.

9. Another suggestion was that residents would use Budleigh Salterton more than Exmouth this will cause huge problems with the infrastructure and facilities there. This is in conflict with Policy OL05

10. If East Devon needs new housing this should be placed in a circle around the Axminster and Honiton or the airport area where roads and communication infrastructure is already in existence and large enough to cope with the increase in population and traffic. The major location of facilities and employment is in Exeter, but road and rail links between Exmouth and Exeter are already over busy. People would drive to the Station in Exmouth and need to park their cars causing more problems.

Full name: William Jonathan Claydon Lyne

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The site should have failed the HELAA test as being within 400 yards of Pebblebed Heaths. It should never have been included to proceed to stage 2. Thus it's inclusion is legally incorrect and is subject to a potential Judicial Review.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXM_20 completely.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site is in conflict with policy SP01. Because of its geography development in Exmouth is limited to a 90 degree arc despite Exmouth being designated a Tier 1 town it is unsuitable for any further development. This site is about 4 miles from the town centre and much closer to neighbouring towns such as Woodbury and Budleigh Salterton which are unable to cope with an influx of almost 1000 houses.

The allocation of EXMO_20 is in conflict with Paragraph 11.6. It qualifies as a "larger" development but most of the site is more than 800m (roughly 10 minutes walk) from any services or community facilities. Thus it is most likely that residents will drive 2 or more miles (via the B3179) either to neighbouring communities or Exmouth town centre.

Allocation of EXM_20 is contrary to Policy TR01. It is extremely unlikely that residents will prefer to walk or cycle from this location for shopping/work/school as the distances are all well over 1 mile, and hilly.

The site is also thus in conflict with paragraph 11.2 as it will increase traffic and require cars to take longer routes. Because of the proximity of Pebblebed Heaths, no housing would be permitted within 400 metres of the proposed junction with B3179 which will increase yet further the necessary distance travelled. Access from the B3179 further increases the distance to Exmouth Town Centre.

The allocation of Site EXM_20 is also contrary to paragraph 3.34. Although Exmouth is a Tier 1 town it already has severe pressure on its infrastructure and services, such as dentists, doctors' surgeries and schools, notably Exmouth Community College. The sewage system in Exmouth is already at capacity as evidenced by the substantial problems last year which necessitated fleets of sewage lorries further increasing traffic congestion.

Allocation of Site EXM_20 also is against policy TR03 and figure 7 of the Local Plan. Due to the restricted access and its hilly topography, the site will create more traffic on the B3179 between Woodbury and Budleigh Salterton. The local plan notes the congestion is already an issue on Western East Devon and the traffic from this site will all be on rural B Roads notorious for congestion and being substandard.

Lastly, the site is in conflict with paragraph 2.6. It is currently open countryside and this is by no means a "modest development" but is in fact a "comprehensive development scheme" in a rural part of East Devon.

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 EXM_20 as a site allocated for development.

As alternatives consider: a. increased development to tier 2 towns which have a 360 degree of potential areas for development such as Honiton and Axminster, both of which have the benefit of being on or adjacent to A Roads. the A 30 and A 35 respectively. b. Increase development in the West-Exe area or between the M5 and A30 close to Exeter Airport to take advantage of far better road and rail connections .

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan is not in accordance with the PCPA 2004 Section 33A. EXMO_20 was deemed not suitable or achievable at the HELAA stage 2 site sifting stage. It has never been either a preferred or second choice scheme and was therefore omitted from regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Harriet Lyons

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: John Macey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Why , yet again , the wildlife of Exmouth , is being destroyed . I listed my objections to the development to the end of Dinan way , look where that got . overwhelming evidence of rare wildlife , including at least two species of bat , great crested newt , small birds , too numerous to mention , birds of prey , many small mammals , plus badgers . The overblown back pockets won again . The Aldi site , another blow , and now this . Apart from all that , who's going to live in these 150 places , NOT Exmouth people that's for sure , what chance have young local people got none . Graft , greed and corruption.....little britain today .

Full name: Andrew MacMullen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 would seriously increase car traffic and congestion in conflict with Para. 11.2. It is a long way (several miles) from the key services and facilities in either Exmouth or Budleigh Salterton, contrary to para. 11.6. It is too far and too steep for people to walk or cycle to the facilities ~contrary to Policy TR01.

Access onto the B3179 would substantially increase traffic on a narrow and winding road with difficult/dangerous junctions.

The position of Exmo_20 would cause harm to the famous Pebblebed Heaths (SAC/SPA), is contrary to Policy PB01 of the local plan and contrary to the mitigation strategy.

Exmo_20 would destroy wildlife corridors (Para. 13.23) and the habitats in mature trees and hedgerows contrary to Para. 13.9.

Exmo_20 is on the rainwater catchment area of Withycombe Brook and would increase the flood risk in Withycombe in conflict with Policy AR01B.

Because the main road access of Exmo_20 is closer to Budleigh Salterton than Exmouth, this would place increased strain on the facilities in Budleigh and lead to the coalescence of Exmouth and Budleigh, which is contrary to Policy OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 entirely from the Local Plan for the reasons given above.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Helen Madell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Why is Exmouth classified as Tier 1. There is a failing infrastructure in Exmouth. There is a poor rail link, branch line, trains cancelled frequently. The A376 and B3179/80 are not suitable for the amount of traffic on them at the moment, and will definitely not cope with the amount of extra housing you are proposing. Accidents frequently occur on B3179 especially at junction of Higher Marley Road and Higher Hulham Road, and more traffic is being channeled onto B3179, from St Johns development (exmo 20) this will increase the probability of more accidents at these junctions. It is ridiculous to propose an exit onto an already overused B road which is not fit for the current amount of traffic using it. This housing goes to within 400m of an important National and European site and it is disgraceful that EDDC, who purport to be protecting our environment would put this area at risk due to extra pollution from cars using a road that runs along the perimeter. The amount of extra footfall onto The Pebblebed Heaths would obviously have an adverse affect on this protected area. This area is much closer to Budleigh Salterton than it is to Exmouth!

Coles Field (Exmo14) This land is encroaching even further up Hulham Road to Pebblebed Heaths and is full of wildlife from adjoining ancient woodland, totally overdeveloped taking away the rural feel of the area.

Littleham (Exmo 17.) This area is in a National Landscape designated area, how can you possibly put so many houses on this site and comply with national planning regulations.

Land off Marley Drive (Exmo 04a) This was a dreadful decision to include this area as it has so many protected/endangered species and habitats on site, ancient woodland and woodpasture, ancient/veteran trees, and ancient parkland which should be registered as a priority habitat. The Lawn area has a very large grouping of ancient/veteran trees which is extremely rare and cannot be replaced or mitigated against. Developing this site would be ignoring so many laws and regulations including para 193 of National Planning Policy Framework. This area has tremendous run off from The Pebblebed Heaths, this runs in a stream under Marley Drive, the stream often overflows flooding the field and further hard landscaping would exacerbate this run off possibly flooding further down into Exmouth and Lympstone. Extra traffic exiting onto Higher Marley Road would have problems joining Dinan Way due to extra traffic generated from development at Littleham and St Johns and would inevitably, along with other traffic trying to avoid gridlock on A376 travel up Higher Marley Road onto B3179, greatly increasing the probability of accidents at the junction. This site is up to the 400m buffer zone to Pebblebed Heaths and provides a green corridor from Pebblebed Heaths to Ancient parkland at The Lawn, the ecology of this site with its natural springs and ponds, ancient trees and woods and pastureland make it unique and it should be protected not destroyed.

Exmouth does not have the infrastructure to support this density of housing, the roads are inadequate, the train service is a poor branch line, the Community College is full, the Doctors are full, Budleigh Salterton and Woodbury GP surgeries not accepting any new patients from Exmouth. Building surgeries still need GPs to provide a service! the Sewage system has failed, the beach closed in the middle of summer and sewage discharges polluting the beach this year. Exmouth cannot cope with the amount of housing you are proposing. I know Government targets need to be fulfilled, but it seems to be an ill thought out plan that seems rushed due to present Government strategy. There are more suitable areas in East Devon that have direct dual carriageway and mainline rail links to Exeter or London, Exmouth is on a peninsula and it is full.

Full name: Jessica Magill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17

Full name: Jonathan Mallard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: 1)

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High street, doctors, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

2) An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Eleonora manca

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo-20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook on heavy clay which makes soakways ineffective- it would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe - This is in conflict with POLICY AR01 B Also development Exmo-20 would fragment and isolate habitats and destroy wildlife corridors, contrary to paragraph 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mrs Janet S Manfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I would like to register my strong objection to the above on the following grounds -

? The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The

services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

Full name: Peter Manfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan It was originally rejected by the officers at EDDC. And EXMO_17 is going to have a huge impact on the area already.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a Budleigh Salterton Councillor

Full name: Mrs Janet S Manfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Lack of co-operation with Budleigh Salterton Town Council

Full name: Mrs. Wendy M March

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth making Budleigh it's most convenient and accessible town. The services and infrastructure of would (High St, Doctors, School, Beach etc.) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan. Would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wilderness and dark skies", which is contrary to POLICY OL01.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Clare Marlow

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the

Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to

POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways

ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY

AR01B. ? Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is

isolated and people would need to travel much further than 800m to existing key

services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from

any town centre for people to use walking or cycling as their choice of transport. This is

contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to

Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Brian Martin

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The EXMO 20 development is adjacent to the National Landscape and the Pebblebed Heaths (SAC/SPA) and will or is more than likely to have a detrimental effect on these valuable national assets. The proposed development is contrary to policy PB01. It would dramatically increase light pollution and noise affecting the peace and tranquility of the nearby wildlife and be detrimental to trees and hedgerows. The flood risk to the lower lying land is in conflict with Policy ARO1B There would be increased car use with additional congestion getting into the town centre and on the nearby minor and the B3176 The infrastructure for sewage disposal is already overwhelmed and not coping. This needs to be redressed before any plan for 700 new homes can be considered in any part of Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Susan Martineau

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Road Access and Sewage disposal. Exmouth has sea and river on two sides and the only access is via the A376 to Exeter and B3178 to Budleigh. Both are heavily overused, a minor accident results on long hold-ups and if there were a Major Incident, emergency crews would struggle. Any further increase in the population, most of whom would commute to Exeter, would make a bad situation much worse. The sewage situation has received so much publicity, country wide, that it is unnecessary to say more.

Exmouth's main income is the tourist industry yet many summer days last year the beach was closed due to pollution. Until SW Water updates its water treatment works and increases their capacity, there should be a hold on new developments.

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.: Increasing the road access is not possible but it would be more sensible to increase e.g. Ottery's or Honiton's share of necessary development as they have 360 degree land around them

for building. And why only 170 homes designated for Sidmouth? Installing small scale sewage treatment works should be a sine qua non for getting planning permission.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ali Martineau

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

I am writing to register my strong objection to the proposed developments EXMO_20 and EXMO_17. These applications would lead to significant overdevelopment in an area where infrastructure is already struggling to cope. If approved, the impact on Exmouth and surrounding areas would be severe, causing irreparable harm to local infrastructure, traffic congestion, environmental sustainability, and flood risks.

1. Overdevelopment and Insufficient Infrastructure

Exmouth's infrastructure is already under immense pressure, and the proposed 1,100 new homes would only exacerbate this issue. Local services—including healthcare, education, and public amenities—are stretched thin, and no credible plans have been presented to ensure that additional residents can be adequately accommodated. If existing infrastructure cannot support current demand, how can it possibly sustain such a substantial increase?

2. Traffic Congestion and Road Maintenance (Contrary to Paragraph 11.6 & Policy TR01)

The road network in and around Exmouth is already overloaded. Additional traffic from these developments would only worsen congestion, increasing travel times and air pollution. Furthermore, the local council is already failing to maintain the roads adequately. If existing roads are in poor condition now, how can they possibly withstand the additional burden?

The claim that people will walk or cycle to town is unrealistic. The distance and steep terrain make it impractical for most residents, leading to further car dependency. This directly contradicts Policy TR01, which promotes sustainable transport methods.

3. Destruction of Wildlife and Habitats

The environmental impact of these developments cannot be ignored. Previous developments have already caused significant damage by destroying and isolating habitats, leading to further biodiversity loss. Wildlife corridors have been broken up, making it increasingly difficult for species to survive. This continued destruction is completely unsustainable—nature simply cannot cope with yet another large-scale development.

4. Increased Flood Risk (Contrary to Policy ARO1B)

EXMO_20 is located upstream of Exmouth on the primary rainwater catchment area of Withycombe Brook. This area consists of heavy clay subsoil, which makes soakaways ineffective. Any further development will worsen an already identified flood risk, putting existing residents at greater danger of flooding. This proposal is therefore in direct conflict with Policy ARO1B, which aims to mitigate flood risks.

5. Loss of Separation Between Budleigh and Exmouth (Contrary to Policy OL05)

The proposed main access for EXMO_20 is located closer to Budleigh Salterton than to Exmouth, meaning that Budleigh would become the more convenient and accessible town for new residents. This would lead to an unacceptable coalescence of Budleigh and Exmouth, eroding the distinct identity of both towns. This directly contravenes Policy OL05, which seeks to prevent the merging of settlements.

Conclusion

These developments are wholly inappropriate for Exmouth. The lack of supporting infrastructure, the inevitable increase in traffic congestion, the destruction of natural habitats, the heightened flood risk, and the erosion of the separation between Budleigh and Exmouth all make these proposals entirely unacceptable.

I urge the council to reject applications EXMO_20 and EXMO_17 in order to preserve the integrity of our town, protect its environment, and maintain a sustainable future for residents.

I look forward to your response and hope that these concerns will be given the serious consideration they deserve.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please, no more development for Exmouth. I suggest you build a new town north of Exeter. Where there is plenty of space, much better links to Exeter City centre, Motor ways, and national rail services. Many more ways to access shops and facilities, larger hospitals, more schools etc etc....

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Anna Matthews

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing with regards to the proposals to build on a protected 'area of outstanding natural beauty' (National Landscape) on the eastern edge of Exmouth.

I strongly object to building on the farmland named Exmo_17. Until very recently this land had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no but despite this, EDDC voted to remove that protection.

National Landscape is of equivalent importance to National Parks and should not have large scale building on it. If house building and light industry/employment development on Exmo_17 were allowed, it would take away the beauty that provides physical and mental wellbeing for residents of Exmouth and Budleigh Salterton, particularly Littleham where arguably residents need the closest proximity access to green space. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

The proposal to build industrial/employment units on this beautiful green field site, next to the main road, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used and loved cycle and footpath, used by people of all ages for leisure and for safe green travel between Exmouth and Budleigh.

Development here would provide more housing but housing sites appear to be chosen by wealthy landowners offering what land they wish (and of course selling it for considerable gains), rather than the council considering very carefully where it would most like to see housing and targeting development in the most appropriate places. And the proposals for development are the same old housing seen everywhere else - when so many houses are on the market already, how more of the same housing stock resolves the real housing needs of the area is not at all clear to see.

For all these reasons, it is not in the public interest of Exmouth to allow building on Exmo_17. I believe that to destroy this landscape would bring only loss to the residents of the local area. It deprives both present and future generations of enjoyment and wellbeing and does not create benefit

Full name: Alan Mauger

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Bill McDermott

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed plan will have significant and detrimental effects on the local infrastructure and natural habitat and at a time when there are already extreme pressures on both. The proposal appears to ignore the communications links and difficulties that already exist for local traffic along the B3179 and would exacerbate traffic issues.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not use the B3179 as the commuting route.

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 show the depth of concern over the plan and to ensure voices are heard.

Full name: Vanessa McGlade

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This proposed development must be located elsewhere. It will cause significant impact to the Pebblebed Heaths it is wholly in contravention to Policy PB01 and not in accordance with mitigation strategies

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This would destroy the wild area, tranquilly and dark skies of the area and countryside . And totally contravenes Policy OL01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This would destroy the wild area, tranquilly and dark skies of the area and countryside . And totally contravenes Policy OL01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Alison McLaren

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of EXMO_20 is significantly closer to Budleigh Salterton than to Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, Beach, etc) would be the preferred choice of residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected: one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/APA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the Local Plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect of this open countryside site and the adjacent internationally designated wildlife sites, elimination the 'tranquillity, wildness and dark skies', which is contrary to POLICY OL01.

Exmo_20 would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats, and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to habitats, veteran trees and hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is 'currently not sufficient certainty to rule out adverse effects in integrity in relation to ... air quality (E. Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR018.

Exmo_20 would increase the need for car travel, contrary to Fig. 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Trick Michael

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmouth 20 would increase the requirement for travel by motor vehicles. This is contrary to figure 7 the energy and increase substantially traffic congestion. This in conflict with Paragraph 11.2. These residents would have to travel further than 800m to any key services and facilities, contrary to Paragraph 11.6. These residents huge amount of weekend traffic from playing fields and archery club on weekends will exacerbate the existing issues that exist. Budleigh Salterton would be the nearest accessible town and the schools, doctors would be under further increased-pressure. This is contrary to Policy TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not proceed with such an ill thought out venture.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jane Michel

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of EXMO_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, doctors, school, beach etc.) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II listed church, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, elimination the "tranquility, wildness and dark skies", which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolation habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30/01/25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe

Brook though Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. This isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Abandon and remove Exmo_20 from the local plan completely, the location is wholly unsuitable for all the reasons mentioned above.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I feel very strongly about this plan and would wish to ensure that my, and many other residents', opinions are heard.

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan as it remains "not suitable or achievable".

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan as it remains "not suitable or achievable".

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan to prevent increasing or exacerbating flood risk elsewhere

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use on the Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access for the site leads naturally down the road into Budleigh High Street whereas to go into Exmouth would require travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The Budleigh High Street, Doctor's surgery, primary school, beach and shops would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified "Strategic Nature Area" (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) asserts there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would funnel traffic along the boundary of the Pebblebed Heath.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not "modest" development. It is a "comprehensive development scheme" within a rural part of East Devon.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan to preserve the outstanding charm and character of this part of rural East Devon.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would produce highly significant vehicle movements to access services within Exmouth and the neighbouring towns using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the increased number of vehicle movements from this site will be on rural B roads, notorious for being congested and substandard.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure it will not add another Doctors surgery or Dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - Exmouth Community College is already at/over capacity. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will greatly increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of

0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time a resident goes out / returns. In addition to this, the distance from the B3179 site entrance into Exmouth centre requires a drive of over 4 miles. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for going shopping or to work/school etc because the distance is too far. Studies cited in the Local Plan show that most people prefer to walk if their destination is within half a mile, and beyond 1 mile cars are the main means of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is extremely unlikely. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate. because the steep local topography and distance to access essential infrastructure and services is simply too far. It will also be a difficult location for those without car access and potentially cause social exclusion.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Even though Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from the town centre and detached from it; it cannot therefore be considered to be a development in Exmouth. The town is unsuitable for further significant growth due to its location on a peninsula. The town centre being at the south end of the peninsula makes 360 degree development impossible and with much existing development already stretching a long way from the town centre, any new development is closer to neighbouring villages and towns and therefore not development at the principal centre of Exmouth. Any development here will be away from the town such that it is an unsustainable location.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Roy Arthur Miles

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is closer to Budleigh Salterton than Exmouth, making Budleigh its most accessible town. This would lead to con;escence of Budleigh and Exmoth, contrary to POLICY OL05 of the Local Plan.

Exmo_20 would increase the need for car travel and congestion on unsuitable roads

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan, or reduce the size Do not access the site via the B3179

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Michael Miller

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would ruin the "tranquility, wildness and dark skies" of the countryside which is out of line with policy OL01. Exmo_20 would adversely affect habitats, including ancient trees and hedgerows, and wildlife corridors, contrary to paras 13.9 and 13.23 of the Local Plan. Exmo_20, as proposed, would greatly increase road traffic in conflict with para 11.2. Essential services are mainly over 2 miles distant (contrary to para 11.6). Walking or cycling to Budleigh or Exmouth would be hazardous in the extreme; not consistent with Policy TR01. What thought has been given to the need for essential services - health and schools in particular? There is a danger that these facilities in Budleigh would be insufficient to cope with the development. The proposed location of Exmo_20 could intensify the flood risk (in conflict with policy ARO1B) particularly at the bottom of the site and through Withycombe.

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.: Reconsider the size of Exmo_20, or its access from the B3179, but ideally take it out of the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sean Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXmo_20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into account

Full name: Casey Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMo_20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into account for consideration

Full name: Charlie Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into serious consideration

Full name: Marico Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into serious consideration.

Full name: Suzanne Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: to ensure that our views are heard and taken into serious account and consideration.

Full name: Andrew Minter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: At the site allocation meeting in October 2024 (EDDC SPC chaired by *** Personal details have been removed ***), Lymptstone Parish Council (LPC) was not allowed to talk on site GH/ED/72a a site nominally in Woodbury Parish but 2.5 miles distant from Woodbury village, but on the edge of Lymptstone Village, so directly impacting Lymptstone not Woodbury. It is a site owned by a Woodbury Parish Councillor who voted on its inclusion as a site offered for development by Woodbury Parish Council. A conflict of interests and also contrary to the Nolan Principles for Civil Servants. A formal complaint was raised about not being able to speak on a site that would directly impact Lymptstone, not Woodbury. This was dismissed. However, the site now magically is included with Lymptstone Settlement, which was the concern all along. This is GERRYMANDERING and anti-democratic.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site should be excluded from the Plan and revisited as part of the Lymptstone Parish Council plan, NOT the Woodbury plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

SD01 Exmouth Lympt_07 Courtland Cross is in Lymptstone Parish and is on the Lymptstone side of the anti-coalescence Green Wedge between Lymptstone and

Exmouth. It is in Lympstone and c 2 miles distant from Exmouth Centre. It is a Lympstone site, not an Exmouth site and should be marked as such. 100 houses

Lymp_14 Coles Fields Is part of Lympstone and not part of Exmouth. It is very far from the centre of Lympstone AND Exmouth. 59 houses.

159 houses allocated to Lympstone Settlement.

SD10 Lympstone As above GH/ED/72a should be removed and revisited with LYMPSTONE Parish Council, not Woodbury, due to conflict of interest, Nolan Rules breach and gerrymandering. 42 houses.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See 3b above.

Lympstone to gain 159 houses from SD01 (Lymp_07 and Lymp_14), GH/ED/72a to be removed and revisited with the correct Consultation Process. Lympstone sites in the plan show an increase of 251 houses a 30% increase in the size of Lympstone Village, which should be a Service Village, NOT a Local Centre. This would irretrievably damage Lympstone, destroy its Sense of Place, and make the village unliveable.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See 2b, 2c, 3b and 3c above

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.: Previous complaints and observations have been ignored, rode roughshod over and allocations incorrectly and surreptitiously applied

Full name: Andrew Minter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

SD01: Lymp_07 Courtlands Cross is in Lympstone Parish and is on the Lympstone side of the existing green wedge between Exmouth and Lympstone. It is UNTRUE/ DISINGENUOUS/ A LIE to say that it is part of 'Exmouth Settlement'. This was pointed out at the site selection SPC in October 2024 and subsequently and has been part of a series of formal complaints inadequately answered by EDDC.

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.: Make Lympstone a Service Village, NOT a local centre

In SD01 show Lymp_07 as being part of Lympstone, NOT a distant part of Exmouth; it isn't part of Exmouth.

State that EDDC will consider significant development of the National Landscape/AONB in order to meet Central Governments MISGUIDED and INCORRECT targets...(for goodness sake EDDC, be a bit more militant!)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: see comments above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want my voice to be heard

Full name: Mark Robert Moffat

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The developments around Lympstone at least do not appear to be sustainable. There is a lot of development already underway in Exmouth and Lympstone with little regard as to whether the infrastructure can support it. Secondary schools are close to or beyond capacity and no plans for how additional health care would be provided are apparent. The majority of the traffic originating in the area passes through the Sandygate roundabout, which is at 84% capacity already. Already, during the main commuter times, it can easily take half an hour to travel the four and a half miles between Lympstone and the Sandygate roundabout. If the intention behind the new Dinan way bypass is to increase the flow of traffic onto the A376, then this will only make the situation worse. The proposed developments Exmo_23, Lymp_01, Lymp_07, GH/ED/72A and GH/ED/73 also demonstrate a lack of awareness of the local infrastructure. Although Lympstone does have a small railway station, the railway runs alongside the river Exe estuary, so any new development has to take place to the East of the station, outside the current built up area boundary and at considerable distance. In this situation, it is highly unlikely that the occupants of any new development would use rail travel to any significant extent. Due to being bounded by the estuary on the western side, all traffic entering and leaving Lympstone must use or cross the A376. Increasing the size of Lympstone village by such a large proportion, with no possibility for alternative routes of entry or exit can do nothing but increase congestion both within the village and on the A376 itself. Site Lymp_07 is upstream of Lympstone, within the rainwater catchment of the Wotton Brook and increasing the risk of flooding in the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Lymp_07 is within Lympstone yet has been included within the allocation for Exmouth. No good reason appears to have been given for this and the impression given is that over time, there will be a coalescence, resulting in the loss of Lympstone as a separate entity. This is a very large development in relation to the size of Lympstone. It has the potential to increase the flooding risk, being upstream of the village and situated on a clay subsoil. If development were to take place here, extensive attenuation measures should be in place. With the exception of Lymp_01, all of the proposed sites within and adjacent to Lympstone are more than 800m from existing key services and will result in increased car use. With the A376 being so congested already and only likely to get worse, sites should have been allocated in locations with at least the potential to increase infrastructure to meet the growing need.

Full name: sue moger

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: sue moger

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

? Revert to Exmo _20b as previously proposed,

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Guy Mogridge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17 and Exmo_20. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17. It would also not be in the public

interest to build next to a SSSI! Once our farmland and green space have gone it has gone forever!

Full name: Philip Morgan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of site EXMO_04a in the EDDC Local Plan is in contravention of Policy PB 03 - Protection of Irreplaceable Habitats and Features, as this site contains:

- Ancient Woodland, Ancient & Veteran Trees.
- Priority Habitats which support the functionality of Protected Species such as Bat Foraging, and Commuting Habitats, curlew bunting nesting and foraging habitat.
- The northern section of the site provides a Commuting Habitat (Wildlife Corridor) linking Marley Hayes Woods, Marley Woods (Ancient Woodland) and the Pebblebed Heath - the maintenance of this Wildlife Corridor is essential in order to protect the extensive wildlife in this location and provide a buffer zone between the Pebblebed Heath and the developments in the south.

The 'Justification for Policy' is not being adhered to, which states: 13.10. Some habitats, including ancient woodlands and veteran trees, are irreplaceable due to their age, uniqueness, and biodiversity. Planning permission will not be granted for proposals that could harm these habitats unless there are exceptional reasons and a robust mitigation/compensation strategy, as per the NPPF. There are no exceptional reasons and a robust mitigation/compensation strategy does not exist and therefore this site EXMO-04a must be removed from the Draft Local Plan as per the NPPF.

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.: In accordance with Policy PB03 the site EXMO-04a should be removed from the EDDC Local Plan:

- Ancient Woodland, Ancient and Veteran Trees,
- Priority Habitats which support the functionality of Protected Species such as Bat Foraging, and Commuting Habitats, curlew nesting and foraging habitat.
- Wildlife Corridor or Commuting Habitat

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Planning permission for this site was refused in 2015 when the Woodland Trust objected and stated that Marley Woods in the NE section was Ancient Woodland and that The Lawn was Ancient Pastureland. Residents have expressed their feelings about this site at various meetings but their views have been ignored up to this point and EXMO-04a has been included in the Draft Local Plan. It is now time to re-assess this site and remove it from the Local Plan. The allocation in the plan is for 50 houses. The huge potential damage to the Biodiversity and Wildlife for the sake of 50 houses does not make sense. Please remove EXMO-04a from the Draft Local Plan before submission to the inspectorate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Digby Morrison

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Lymp_07 is in Lympstone Parish Boundary but was consulted on as an Exmouth site. This failed to highlight to Lympstone residents a site which they would have wanted to respond to consultation on and therefore the site, and policy have not been properly consulted on. The rushed final councillor meetings to select the sites to include in the plan, when they came back to sites that had been previously moved on from, to make up the full required number of houses, put Lymp_07 as the first site to consider. Sites considered earlier in the meeting were clearly more likely to be selected under the time pressure and pressure for numbers that councillors were. Sites should have been considered with the least suitable or least preferred considered last in the meetings and the 'easier' less controversial sites considered first. So that councilors could consider less suitable sites later in the meeting, and be able to decide on these sites in full knowledge of how many more houses they needed to find. therefore being able to not allocate controversial sites that were not required to make up the numbers. The process followed, of considering Lymp_07 first has resulted in this site being selected in preference to far more suitable and less controversial sites.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The final site selection meeting needs to be re-run in order to conduct a more fair site selection only considering less suitable and more controversial sites, towards the end of the meeting if housing numbers are still required.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

In the same way that I believe the plan is not legally compliant, because the site selection process was flawed, I also believe the plan is not justified. The selection of Lymp_07 is not appropriate when compared to the other site options you could have chosen. Lymp_07 is in Lympstone Parish Boundary but was consulted on as an Exmouth site. This failed to highlight to Lympstone residents a site which they would have wanted to respond to consultation on and therefore the site, and policy have not been properly consulted on. The rushed final councillor meetings to select the sites to include in the plan, when they came back to sites that had been previously moved on from, to make up the full required number of houses, put Lymp_07 as the first site to consider. Sites considered earlier in the meeting were clearly more likely to be selected under the time pressure and pressure for numbers that councillors were. Sites should have been considered with the least suitable or least preferred considered last in the meetings and the 'easier' less controversial sites considered first. So that councilors could consider less suitable sites later in the meeting, and be able to decide on these sites in full knowledge of how many more houses they needed to find. therefore being able to not allocate controversial sites that were not required to make up the numbers. The process followed, of considering Lymp_07 first has resulted in this site being selected in preference to far more suitable and less controversial sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The final site selection meeting needs to be re-run in order to conduct a more fair site selection only considering less suitable and more controversial sites, towards the end of the meeting if housing numbers are still required.

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

I don't know. I haven't found any description of the co-operation with other councils.

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 clearly articulate and represent the views I have expressed that the conduct of the final site selection meetings was flawed

Full name: Mrs Lisa Murdoch

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site contrary to PARAGRAPH 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Dr Robert Murdoch

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO20 as a site for 700 homes representing an increase in population of over 2000 people on the edge of the Pebblebed heath is unacceptable. This is encroaching within the 400m limit to development of the SPA SAC and NNR. The strategy for almost linking this development with Goodmoors will significantly alter that whole ecosystem. There has been no wildlife survey done thus far as mature woodland, grassland and open field will support a huge diversity of flora and fauna which will be eroded. It is also ill considered when it comes to access. The B3179 from the Ting Tongs is an accident black spot and the road heading to Woodbury has a 60 mile limit making right angle access dangerous.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo 20 will be a development of 100 houses situated along St Johns Rd so as not to encroach on virgin farm land or encroach on non permitted areas adjoining Pebblebed heaths.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: David Murphy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

In addition to the above, I do not believe that the planners and developers have demonstrated that this planned development has or will meet the criteria as set out, for it to qualify as "in exceptional circumstances".

Full name: Patryk Nelkowski

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Additionally the extra home would place an increased strain on the surrounding infrastructure. From healthcare, and emergency services to roadways and schools.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: David Newman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO 20 is closest to Budleigh which does not have the resources to support it. In effect this joins Budleigh and Exmouth contrary to Policy OL05. Exmo20 will have environmental impacts contrary to policy HE02 and OL01 OL09 PB04. Would increase flooding risk AR01B and pollution which is out of control. There is no public transport and the road isn't suitable contrary Policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce size and no access via B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan lacks clarity and legal certainty regarding land contributions. The proposal involves multiple parcels of land across separately owned areas, some of which have not yet been agreed upon by the landowners. Additionally, areas designated for key community facilities such as the community hub, school, and common areas are included on the original plans, despite not being available for development. Without legally binding agreements in place, the application may be deficient and fail to meet the requirements of Section 106 of the Town and Country Planning Act 1990, particularly regarding the necessary contributions for infrastructure and affordable housing. This lack of secure land agreements undermines the soundness of the plan.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in clear conflict with paragraph 11.2 of the Local Plan, which advocates for the concentration of significant development in areas that minimize travel distances, reduce reliance on private vehicles, and promote sustainable transport choices. Exmo_20 is situated in a location that will inevitably increase travel needs, necessitating the use of cars for even the most basic journeys. The housing is proposed to be at the southern end of the site, while the primary vehicular access point is located at the very northern edge, adjacent to the protected Pebblebed Heaths (SAC/SPA/SSSI). Due to the mandatory 400-meter buffer zone around these ecologically sensitive areas, no housing can be constructed within the top 400 meters of the site. This restriction creates a minimum of a 0.5 km drive just to reach the residential areas from the site entrance. This means that for every journey, residents will have to drive at least 1 km within the site itself just to get from the entrance to the housing. This unnecessary internal driving will increase overall car dependency and is incompatible with the objectives of the Local Plan, which seeks to reduce the environmental impact of transportation.

The situation is further exacerbated by the need for residents to drive an extended route to access Exmouth town center. From the B3179 site entrance, residents must drive around the edge of Exmouth and back down into the town center, covering a distance of 4.0 to 4.3 miles. This longer route will make daily travel to and from the town center more time-consuming, inefficient, and car-dependent. Given that Exmo_20 is located far from the town center and essential services, this development will likely result in a significant increase in the number of car journeys, which will further contribute to traffic congestion, pollution, and the carbon footprint of the area.

This development's location is at odds with the strategic aims of paragraph 11.2 of the Local Plan, which advocates for development that minimizes the need for travel, particularly by private car. The long distances and lack of immediate access to services make walking, cycling, and public transport impractical options for most residents. While the Local Plan encourages developments that promote more sustainable travel options, the design and location of Exmo_20 will inevitably increase the number of car trips, generating greater road traffic and undermining any efforts to reduce the environmental impact of transportation.

Additionally, the proposed development will further marginalize individuals without access to private vehicles, exacerbating social exclusion by isolating residents from essential amenities and services. The lack of alternative transport infrastructure, coupled with the increased reliance on cars, will make it difficult for non-car owners to access work, school, healthcare, or recreational facilities, creating a greater divide between those who can afford a car and those who cannot. This not only undermines the sustainability goals of the Local Plan but also threatens to exacerbate social inequality and limit the ability of residents to fully participate in the community.

In conclusion, the allocation of Exmo_20 fails to meet the objectives set out in paragraph 11.2 of the Local Plan, which advocates for sustainable development that reduces travel needs and minimizes reliance on cars. The site's location and design will increase car dependency, generate additional traffic, and marginalize non-car owners, all of which are in direct opposition to the principles of sustainable development outlined in the Local Plan.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in clear conflict with policy TR01 of the Local Plan. Due to the significant distance between this site and essential services such as shops, workplaces, and schools, walking or cycling will not be the preferred mode of transport for residents. Research cited in the Local Plan indicates that most people prefer to walk to their destinations if they are within 0.5 miles. Beyond 1 mile, cars become the dominant mode of transport, and at distances greater than 2 miles, trips made on foot are rare. Exmo_20 is located far beyond the 0.5-mile or even 1-mile thresholds, making walking or cycling an unrealistic option for most residents when accessing daily necessities. As such, these sustainable modes of transport cannot be relied upon as the primary means of travel for the majority of the population.

Even if walking routes, cycle paths, or public transport options were introduced, they would have minimal impact on reducing the number of car journeys generated by this development. The steep local topography, combined with the considerable distances to essential infrastructure and services, further exacerbates the difficulty of walking or cycling. The landscape's natural incline and the lack of nearby facilities make these alternatives unfeasible for the majority of residents. As a result, the development is likely to generate a high volume of car traffic, which would add to congestion and further undermine the Local Plan's aims for sustainable travel.

Additionally, the site's location presents a significant challenge for individuals without access to a car. The distance from essential services, combined with the lack of viable transport options, could lead to social exclusion for those who are reliant on public transport or walking. For these individuals, the isolation of Exmo_20 from key amenities would limit their ability to engage in daily activities, such as shopping, work, or school

runs. The development would therefore not only increase car dependency but also marginalize residents without cars, undermining the social inclusivity that should be a priority for any new development. In summary, the allocation of Exmo_20 does not align with the objectives of policy TR01, as it will create a car-dependent community and exacerbate social exclusion for vulnerable groups.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in direct conflict with paragraph 13.9 of the Local Plan. According to the National Planning Policy Framework, ‘irreplaceable habitats’ are defined as habitats that are extremely difficult, or take an extended period of time, to restore, recreate, or replace once destroyed. The development of Exmo_20 would result in the loss of such irreplaceable habitats. The site contains a significant number of mature trees, many of which display signs of veteranisation. These trees are crucial for providing unique microhabitats that support a wide range of species. Their loss cannot be compensated simply by planting new trees, as these mature trees have established complex ecological roles that take decades, if not centuries, to replicate.

In addition to the trees, Exmo_20 is home to numerous long-established hedgerows that traverse the site, some of which stretch over considerable lengths. These hedgerows, along with the mature trees, contribute to a highly biodiverse environment, offering essential habitats and functioning as wildlife corridors. While it may be possible to leave spaces around some of these features, the overall degradation and fragmentation of the habitats they provide is unavoidable with the proposed development. The impact on biodiversity would be significant, and these natural features cannot be easily replaced or restored.

Furthermore, the site lies within an identified ‘Strategic Nature Area’ (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy. This strategy aims to connect and expand existing wildlife sites, creating a more integrated and resilient ecological network. Exmo_20 plays a crucial role in linking habitats, providing wildlife corridors between the Pebblebed Heaths to the north and the woodlands to the south.

The development of Exmo_20 would disrupt these connections, causing adverse effects on both the local biodiversity and the broader goals of the Nature Recovery Network.

The site is also home to species such as the Nightjar, which is a qualifying feature of the East Devon Heaths SPA. Studies show that Nightjars can travel up to 7km from their nesting sites to feed at night, making the loss of foraging habitats or the disruption of their flight paths a serious concern. Such disturbances could undermine the conservation objectives of the SPA and negatively impact the Nightjar population.

In summary, the allocation of Exmo_20 threatens irreplaceable habitats, disrupts vital wildlife corridors, and undermines the broader ecological objectives of the Local Plan and the Nature Recovery Network. The development of this site would lead to irreversible ecological damage, significantly affecting both the local and regional biodiversity.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in direct conflict with paragraph 13.9 of the Local Plan. According to the National Planning Policy Framework, ‘irreplaceable habitats’ are defined as habitats that are extremely difficult, or take an extended period of time, to restore, recreate, or replace once destroyed. The development of Exmo_20 would result in the loss of such irreplaceable habitats. The site contains a significant number of mature trees, many of which display signs of veteranisation. These trees are crucial for providing unique microhabitats that support a wide range of species. Their loss cannot be compensated simply by planting new trees, as these mature trees have established complex ecological roles that take decades, if not centuries, to replicate.

In addition to the trees, Exmo_20 is home to numerous long-established hedgerows that traverse the site, some of which stretch over considerable lengths. These hedgerows, along with the mature trees, contribute to a highly biodiverse environment, offering essential habitats and functioning as wildlife corridors. While it may be possible to leave spaces around some of these features, the overall degradation and fragmentation of the habitats they provide is unavoidable with the proposed development. The impact on biodiversity would be significant, and these natural features cannot be easily replaced or restored.

Furthermore, the site lies within an identified ‘Strategic Nature Area’ (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy. This strategy aims to connect and expand existing wildlife sites, creating a more integrated and resilient ecological network. Exmo_20 plays a crucial role in linking habitats, providing wildlife corridors between the Pebblebed Heaths to the north and the woodlands to the south.

The development of Exmo_20 would disrupt these connections, causing adverse effects on both the local biodiversity and the broader goals of the Nature Recovery Network.

The site is also home to species such as the Nightjar, which is a qualifying feature of the East Devon Heaths SPA. Studies show that Nightjars can travel up to 7km from their nesting sites to feed at night, making the loss of foraging habitats or the disruption of their flight paths a serious concern. Such disturbances could undermine the conservation objectives of the SPA and negatively impact the Nightjar population.

In summary, the allocation of Exmo_20 threatens irreplaceable habitats, disrupts vital wildlife corridors, and undermines the broader ecological objectives of the Local Plan and the Nature Recovery Network. The development of this site would lead to irreversible ecological damage, significantly affecting both the local and regional biodiversity.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in direct conflict with paragraph 13.23 of the Local Plan. The site lies within an identified 'Strategic Nature Area' (SNA 368), which forms an integral part of the Nature Recovery Network. This network, outlined in the Local Nature Recovery Strategy, aims to link and expand existing wildlife sites while enhancing habitats and biodiversity across the region. Exmo_20, as part of this strategy, serves as a vital connector between different ecological zones, facilitating wildlife corridors that enable species to move and thrive. The site connects the Pebblebed Heaths to the north with the woodlands to the south and beyond, forming a continuous habitat that supports a diverse range of species. The development of Exmo_20 would fragment these critical habitats, disrupting the connectivity that is essential for maintaining biodiversity and the health of local ecosystems.

This disruption is particularly concerning given that the area supports species that rely on the integrity of the landscape for their survival. Notably, the Nightjar, a qualifying feature of the East Devon Heaths SPA, relies on the heathlands for breeding and foraging. Research indicates that Nightjars can travel up to 7km from their nesting sites to forage for food, typically at night. The proposed development could lead to the loss of foraging habitat or disrupt the Nightjars' routes to their feeding areas, undermining the species' ability to meet its nutritional needs and jeopardizing the conservation objectives of the SPA. As these birds are already vulnerable to habitat fragmentation, the loss or disturbance of key foraging areas could have a devastating effect on their population and on the broader ecological balance of the region.

Therefore, the allocation of Exmo_20 would have far-reaching consequences not only for the immediate wildlife corridors and habitats but also for the long-term conservation

goals set forth in the Local Plan and the Nature Recovery Network. The development threatens to undermine the effort to combine and extend wildlife sites, with the potential to disrupt the delicate balance of local ecosystems, particularly those that rely on the integrity of the strategic nature areas and their associated habitats.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in clear and direct conflict with policy OL09 of the Local Plan. The recent Habitats Regulations Assessment (dated 30.01.25) raises significant concerns, specifically highlighting that there is, at present, a "lack of sufficient certainty to rule out adverse effects on the integrity of the East Devon Pebblebed Heaths SAC/SPA, particularly in relation to air quality." This uncertainty is particularly troubling as it underscores the potential, albeit unquantified, risks that the proposed development may pose to this important and sensitive ecological area.

One of the key issues identified in the assessment stems from the fact that the primary access route to Exmo_20 would be via the B3179, which passes directly along the boundary of the East Devon Pebblebed Heaths. This access route, therefore, has the potential to increase traffic volumes along the boundary of the SAC/SPA, a factor that could exacerbate air quality concerns, particularly in relation to nitrogen dioxide and other pollutants that are harmful to the delicate ecosystems of the heathlands. The additional traffic generated by the development could lead to a significant and lasting impact on the health of the protected site, especially given that the Pebblebed Heaths SAC/SPA is already vulnerable to the effects of atmospheric pollution.

Given this considerable uncertainty regarding the impact of air quality on the integrity of the site, it is evident that the allocation of Exmo_20, without further detailed and robust mitigation measures, could result in harm to the ecological value of the Pebblebed Heaths. This situation calls into question whether sufficient precautions are being taken to protect the health and sustainability of this vital natural resource. Furthermore, it highlights the need for the local planning authority to reconsider alternative sites that would not pose such significant risks to the integrity of the SAC/SPA, thus adhering to

the principles of the Habitats Regulations and the objectives set forth in policy OL09, which seeks to protect and preserve the natural environment from development pressures that could lead to adverse effects.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in direct conflict with policy PB01 of the Local Plan and fails to align with the established mitigation strategy. The proposed development at this location poses a significant risk to the integrity of the nearby Pebblebed Heaths (SAC/SPA), an area of considerable ecological value. Given the environmental sensitivity of the Pebblebed Heaths, the development of Exmo_20 would likely result in harmful consequences, including potential disruption to local wildlife habitats, biodiversity, and the overall ecological balance of the site.

Furthermore, there are alternative sites available for development that would have far less, if any, adverse impact on the Pebblebed Heaths. These alternatives would allow for necessary growth and development without encroaching on this environmentally sensitive area. By choosing Exmo_20 for development, the plan disregards the possibility of using less damaging locations, thus failing to adhere to the principles of sustainable development outlined in policy PB01. The proposed site not only contradicts the mitigation strategy but also undermines efforts to protect the ecological integrity of the Pebblebed Heaths, raising serious concerns about the long-term environmental consequences of this allocation.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in clear conflict with policy HE02. The scale of development proposed for Exmo_20, located in proximity to St. John in the Wilderness Church (Grade II* listed), would have profound and lasting negative effects on the serene and isolated environment surrounding both the church and its churchyard. St. John in the Wilderness Church, a historically and architecturally significant structure, currently benefits from a quiet, tranquil setting that provides an essential atmosphere for contemplation, reflection, and worship. The church and its immediate surroundings are integral to the religious and cultural experience of its congregation, with the peaceful environment contributing to the spiritual and communal values associated with the church.

However, the substantial development of Exmo_20 in such close proximity to this sensitive site would dramatically alter the existing setting. The introduction of new buildings, roads, and infrastructure would introduce a level of noise, activity, and visual intrusion that would undermine the calm and reflective atmosphere the church currently enjoys. The proximity of such a large-scale development would effectively strip away the seclusion of the site, transforming the space from one of peacefulness and historical reverence into one overshadowed by the demands of modern urban growth. This disruption to the church's surroundings would significantly impact not only the aesthetic and spiritual experience for those attending the church but also the broader historical context in which this important building is situated. The development threatens to irreparably harm the heritage value of the church and its grounds, undermining the objectives of policy HE02, which aims to preserve and protect such sensitive sites from developments that could alter their character and historical significance.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy OL05. The site's main access point is just 2.2 miles from Budleigh Salterton's centre but 4 miles from Exmouth, making Budleigh significantly more accessible. The natural route from the site leads directly into Budleigh Salterton High Street, whereas reaching Exmouth requires traveling twice the distance and skirting around its outskirts. Residents of Exmo_20 would naturally rely on Budleigh's High Street, doctor's surgery, primary school, and other amenities. Currently, Exmouth and Budleigh function as separate communities, but this development would blur that distinction, effectively merging the two by placing housing in one town while depending on services in the other.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 3.30. The settlement boundary of Exmouth has been extended to include not only the land designated for housing but also the 400m buffer zone adjoining the Pebblebed Heaths, effectively classifying it as suitable for development. While housing cannot be built on the buffer zone, its inclusion within the settlement boundary allows for other forms of development. This contradicts the precautionary approach, as the plan fails to provide robust protection against the adverse effects of recreational use on the Pebblebed Heaths.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy AR01(B). Located upstream of Exmouth in the main rainwater catchment area of Withycombe Brook, the site has heavy clay subsoil, making soakaways ineffective and causing frequent waterlogging. Development on this steep land would significantly worsen flood risks in the lower areas below the site and through Withycombe.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan-making process does not comply with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" during the HELAA Stage 2 assessment and was never a preferred or second-choice site, leading to its omission from Regulation 18 consultations. On 03/09/24, it was abruptly allocated despite the assessment being incomplete, with no opportunity for public or Strategic Planning Committee input.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan-making process does not comply with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" during the HELAA Stage 2 site assessment and was never a preferred or second-choice site, leading to its omission from Regulation 18 consultations. On 3rd Sep 2024, the site was suddenly allocated without a completed assessment, denying further public or Strategic Planning Committee input.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan does not comply with PCPA 2004 Section 33A. Exmo_20 was deemed unsuitable and unachievable during the HELAA Stage 2 site assessment. It was never a preferred or second-choice site and was therefore omitted from Regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(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.: Allocation of EXMO_20 is in conflict with policies SP01

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I cant see how given the distance

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

The allocation of Exmo_20 conflicts with policy SP01. Although Exmouth is a Tier 1 town, Exmo_20 is four miles from the town centre and detached from it, making it unsuitable for development as part of Exmouth.

Exmouth is already constrained by its location on a peninsula between the River Exe and the coast. With the town centre at the southern end, expansion is limited, and further development would be closer to neighbouring towns than to Exmouth itself.

Given its distance from the town, Exmo_20 is an unsustainable location for development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I don't see how it can be

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mr Roy Norton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO_20 would increase the need for car travel and increase traffic congestion, in conflict with paragraph 11.2. It is unsustainable development. It is isolated and people need to travel much further than 800m to existing key services and facilities, contrary to paragraph 11.6. It is too far (and too steep) from any town centre for people to use walking and cycling as their choice of transport. This is contrary to policy TR01. The main access point of EXMO_20 is significantly closer to Budleigh (High Street, Doctors, school, beaches etc.) would be the obvious choice for residents of EXMO_20. This would lead to coalescence of Budleigh and Exmouth, contrary to Policy OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Nother

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Nother

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Full name: Sarah Nutt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 for the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into account

Full name: D Nutt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 for the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To make sure that our objections are heard and taken into serious consideration

Full name: Carrie Nutt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into serious consideration.

Full name: Catherine OConnor

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

First: development will not be permitted if it could lead to or encourage settlement coalescence. The allocation of Exmo_20 will lead to coalescence between Budleigh and Exmouth. Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. (POLICY OL05: This policy stated that development will not be permitted if it could lead to or encourage settlement coalescence).

Second: Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Catherine OConnor

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Further reasons in addition to Unsustainable Location include Flood Risk and the impact on the Grade II* listed church St John in the Wilderness.

First: Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. (POLICY AR01(B) states that development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere).

Second: ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. (POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Catherine OConnor

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This is for two reasons.

First: “Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

Second: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

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.:

Modification necessary is as follows: Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Unsustainable Location

Allocation of EXMO_20 is in conflict with policies SP01, TR01, TR03, and paragraphs 11.2, 11.6, 3.34 and 2.6 of the Local Plan. ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location. (POLICY SP01 proposes to promote the most significant levels of development at the principal centre of Exmouth).

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements. (PARAGRAPH 11.6 proposes that it is feasible for

larger developments to be within 800m of key services and facilities. (Studies cited in the Local Plan show that people prefer to walk if their journey is not further than 800m/10 minutes walking each way)).

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion. (POLICY TR01 proposes that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development).

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of

0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. (Paragraph 11.2 promotes focussing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion).

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards

infrastructure etc it will not add another Doctors' surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewage has been featured on national news several times, highlighting the scale of the problem it has. (PARAGRAPH 3.34 states that by directing growth to the tier 1-4 settlements their approach ensures development is concentrated in areas with existing infrastructure and services).

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard. (POLICY TR03 states that where development is likely to generate significant amounts of vehicle movements planning permission will not be granted unless they can identify measures to secure new sustainable travel arrangements, taking into account (amongst other things) the scale of development and the availability of public transport, and walking and cycling opportunities).

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon. (PARAGRAPH 2.6 states that "Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There has been a failure to comply with the duty to co-operate in relation to Exmo_20. The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to express my strong objection to the application to build 700 houses under plan Exmo_20 – 20a and 20b. I fully understand the need for additional housing and for the governments drive to reach targets however I feel this site would be detrimental to the environment and to the town. Access Firstly, I would like to address the access through Southern Wood. The road was not designed as and is not suitable as a through road for up to 1000 cars. The existing infrastructure of the surrounding roads is not capable of accommodating this increased demand The comment by the developer in the vision document for “St Johns Woodland Village” implies walking and cycling would be prioritised, I think we all know this is untrue. Access for buses, which would have an increased demand, would also be very difficult. A bus service through Meadow View was cancelled a few years ago for this very reason proving this is not a sustainable option. From a safety concern Emergency Vehicles such as Fire Engines and Ambulances would without doubt have access issues. I also feel there would be a safety issue for pedestrians who would have to dismount pavements and cyclist who would have to mount roads in order to avoid cars which have been forced to park in dangerous positions. I have not seen the plans for the bridge at the bottom of the road yet and so do not know the infrastructure behind it. Where will it start? What barriers will there be? Agreed I am not an engineer, but I assume the bridge will need to be very substantial in order to carry the vehicles and materials required for the construction in the first instance then long term. Once the bridge is in place the precious parking spaces at the bottom of the road will be removed forcing more cars to park on the road. Adding to the parking issues we already have which in turn will limit the size of vehicles able to get through. When access off the Salterton Road or through the readymade Liverton Business Park is easier, more practical, and most importantly safer, I fail to see why this is not the obvious and preferred option. Impact on the environment Secondly there would be a very negative impact on the environment. A variety of wildlife, including protected species, live in the assigned development area such as not limited to

woodpeckers, bats, fox, deer, Dormice and Buzzards to name but a few. This proposal would be a destruction of their habitats. A negative effect on the local ecosystems and ecology, reduced air quality, light pollution, increased traffic, increased flood risks, and a decline in local biodiversity are just a few of the environmental repercussions all having long term effects. In addition, there will be the potential pollution from construction activities. Turning natural drainage into a concrete jungle invites a huge flood risk and with the issues Southwest Water are currently facing I feel this will only enhance the issue. They cannot cope with the waste management system as it stands today! The bridge itself could also cause a build-up of debris causing flooding. Impact on local amenities and services Lastly but by no means least is the impact on local amenities The Goodmores Development off Dinan Way is not anywhere near finished so the impact that will have on the town, in the short and long term, is unknown. With all the additional people coming to live in Exmouth there will be excessive strain on an already bowing services. Access to Healthcare, whether that be a Dr, Dentist or Hospital appointment is difficult if not impossible to get. We do not have enough Police to cover the current requirements of the town without extending the size quite dramatically. Maintaining access to essential amenities and services is crucial for the well-being and quality of life of residents. Who are buying all these houses, families with children? Therefore, schools will also be affected. If I am correct the original plans for the Goodmores development included a school, these plans were passed and I assume changed after, as there doesn't appear to be a school!!! I feel very strongly opposed to the development of Exmo_20 and would very much appreciate if my voice could be heard. Thank you for your time in reading this letter.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20, Under paragraph 5.3, page 78 of plan, states that “vehicular access, to accommodate modest levels of development, will be allowed for southern site parts from the road ‘Southern Wood’.” No information is given as to what exactly forms the ‘southern site parts’, how many houses this comprises, nor the measures that will prevent the entire site using an access point via Southern Wood. It should therefore be assumed that any entrance to the site via Southern Wood would be available to the entire site of 700 homes.

The Government Centre for Social Research published a study in June 2024 on Car Ownership that stated amongst its key findings under 1.1.1. that “the proportion of households with one car has remained at around 45% and the proportion with two or more vehicles has increased from 8% to 34%.” So it is safe to assume that with 700 homes there will be around 1000 vehicles on the proposed site of Exmo_20. It is also worth noting that the average cars per household in Southern Wood currently is more than 2 cars per household which supports the likely quantity of cars in Exmo_20. While Southern Wood is a quiet cul de sac, the road connecting it to the nearest main route is Meadow View Road which is constantly full of parked cars and at numerous points it only passable for one vehicle at a time. Vehicles have to regularly stop and give way, sometimes reversing to create space, and cars will regularly be stuck on Dinan Way, unable to even turn in to Meadow View Road.

It’s also worth noting that Meadow View Road on which had regular scheduled bus services cancelled due to lack of accessibility. It is ludicrous to think that 1000 vehicles taking an average of 2 trips per day, would not make the situation considerably worse than it already is. Any properly conducted assessment that took place around school

pick up times and rush hours would see how unfeasible Southern Wood is as an access point.

Furthermore, any access via Southern Wood would necessitate a bridge being built over Withycombe brook at the end of Southern Wood. We have not seen the plans for a potential bridge at the bottom of the road yet and so do not know the infrastructure behind it but given the positioning of the brook it would need to be substantial and inevitably seriously negatively impact Southern Wood and its residents as well and the woodland habitat surrounding the bridge.

Once the bridge is in place the precious parking spaces at the bottom of Southern Wood will be removed forcing more cars to park on the road, adding to the parking and road accessibility issues already faced by existing residents.

When access through the ready built Liverton Business Park via B3179 is easier, more practical and most importantly safer, I fail to see why any other entrance is required, particularly given the impact.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not consider any access point to Exmo_20 via Southern Wood. Instead rely solely on the B3179 access via Liverton Business Park.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident whose family live near to the proposed site of Exmo_20. I therefore have a vested interest and would like to be present for any and all hearing related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of car travel through the development each time residents leave their home and returned.

In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. With a large development of around 700 homes and noting the UK average of 1.29 cars per household, the proposed development would lead to around 1000 additional cars hugely increasing congestion and pollution in the area which directly contradicts Paragraph 11.2.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20

from the Local Plan and instead look to develop a far more suitable location close to existing amenities and transport links.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident and my family, who live very near to the proposed site of Exmo_20, will be severely impacted if the planned development goes ahead. Therefore I would like to be present for any and all hearings.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

Paragraph 17 – HELAA assessment concluded that the proposed site for Exmo_20 was “Available but not suitable or achievable” [appendix E(v)1]. However the Sustainability Appraisal Report states that Exmo_20 was assessed as suitable, available and achievable in the HELAA” which is incorrect. A key process for the site selection has not been adhered to by EDDC and an incorrect outcome of a report recorded.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

Exmo_20 directly contradicts Chapter 17, paragraph 17.1 of the local plan which states that sites must be "Suitable for residential development according to Local Plan and NPPF policies."

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.: Find an alternative site(s) because Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of

Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 directly contradicts Chapter 17, paragraph 17.1 of the local plan which states that sites must be “Suitable for residential development according to Local Plan and NPPF policies.”

The plan making process has not been in accordance with National Planning Policy Framework Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

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.: Find an alternative site(s) because Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

This is taken from a quotation from the Gospel of St John: 'I am the voice of one calling in the wilderness, make straight the way of the Lord. ' – St John will now be calling god from a housing development of 700 homes instead of the current wilderness surrounding this Grade II* listed 14th century church.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of

Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site please.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). Turning the natural drainage the site current provides through trees and grassland into a concrete jungle invites a huge flood risk, particularly to all of the existing houses and businesses bordering Withycombe Brook.

The proposed site of Exmo_20 sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. In addition there will be the potential pollution added to flood waters from construction activities.

A site entrance via Southern Wood has been included in the plan for Exmo_20 that would require a large bridge to be built over Withycombe Brook that runs along the end of Southern Wood (it would NOT be possible to access the site from Southern Wood without a bridge being built). Withycombe Brook regularly floods and there has been land erosion as a result of flooding to the area at the bottom of Southern Wood where the bridge would need to be built and surrounding homes. The bridge itself could also cause a build up of debris causing further flooding.

A nearby development, Goodmores, is still under construction and we are already seeing swathes of mud and flood water covering areas of the main access road that is Dinan Way. Water run off from Exmo_20 would inevitably compound this issue due to the location of the proposed site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location that does not increase flooding all along Withycombe Brook

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). Turning the natural drainage the site current provides through trees and grassland into a concrete jungle invites a huge flood risk, particularly to all of the existing houses and businesses bordering Withycombe Brook.

The proposed site of Exmo_20 sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. In addition there will be the potential pollution added to flood waters from construction activities.

A site entrance via Southern Wood has been included in the plan for Exmo_20 that would require a large bridge to be built over Withycombe Brook that runs along the end of Southern Wood (it would NOT be possible to access the site from Southern Wood without a bridge being built). Withycombe Brook regularly floods and there has been land erosion as a result of flooding to the area at the bottom of Southern Wood where the bridge would need to be built and surrounding homes. The bridge itself could also cause a build up of debris causing further flooding.

A nearby development, Goodmores, is still under construction and we are already seeing swathes of mud and flood water covering areas of the main access road that is

Dinan Way. Water run off from Exmo_20 would inevitably compound this issue due to the location of the proposed site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location that will not increase local flooding.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). Turning the natural drainage the site current provides through trees and grassland into a concrete jungle invites a huge flood risk, particularly to all of the existing houses and businesses bordering Withycombe Brook.

The proposed site of Exmo_20 sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

In addition there will be the potential pollution added to flood waters from construction activities.

A site entrance via Southern Wood has been included in the plan for Exmo_20 that would require a large bridge to be built over Withycombe Brook that runs along the end of Southern Wood (it would NOT be possible to access the site from Southern Wood without a bridge being built).

Withycombe Brook regularly floods and there has been land erosion as a result of flooding to the area at the bottom of Southern Wood where the bridge would need to be

built and surrounding homes. The bridge itself could also cause a build up of debris causing further flooding.

A nearby development, Goodmores, is still under construction and we are already seeing swathes of mud and flood water covering areas of the main access road that is Dinan Way. Water run off from Exmo_20 would inevitably compound this issue due to the location of the proposed site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location that does not hugely increase risk of flooding to existing dwellings and businesses.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been deliberately extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths Nature Reserve, therefore changing the definition of this land to be acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location.

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)

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy OL05 as it would effectively join the town of Exmouth and Budleigh Salterton by removing the green belt currently separating the towns – very definition of coalescence being “the joining or merging of elements to form one mass or whole.”

The primary access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down in to it.

The High Street, Doctor’s surgery, primary school, beach etc in Budleigh Salterton would be the most accessible, nearest and therefore the obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two towns, with residents living in one town whilst relying on the already over stretched day-to-day services and infrastructure of the other.

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relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location where two town will not be forced to coalesce.

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)

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

This is taken from a quotation from the Gospel of St John: 'I am the voice of one calling in the wilderness, make straight the way of the Lord. ' – St John will now be calling God from a housing development of 700 homes instead of the current wilderness surrounding this Grade II* listed 14th century church.

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ALLOCATION OF Exmo_20 is in conflict with policy OL01. The proposed site of Exmo_20 is distinctive for its dark skies, tranquillity and wildness. In addition to light that will inevitable be produced from the housing and lamp posts on the development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site.

The area around the neighbouring St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development surrounding it, regardless of a buffer zone being left. This will also have a negative impact on church goers and those with loved ones in the surrounding cemetery.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location.

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ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines ‘irreplaceable habitat’ as “habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed”. Exmo_20 will cause loss of long established and irreplaceable habitats.

The woodland on the site has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees that would take hundreds of years to mature and are unlikely to ever achieve the same level of biodiversity.

We have already seen healthy veteran trees being felled on the proposed site of Exmo_20 to produce pathways from what was previously dense and undisturbed woodland. These newly created pathways have been since described as ‘naturally occurring’ which is absolutely incorrect.

The Exmo_20 site also contains many long established hedgerows, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable.

Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these birds fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or

disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths Nature Reserve at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location which would not remove or reduce irreplaceable habitats.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths National Nature Reserve at the north of the site through to the woodland at the south and beyond, all of which would be very negatively impacted by the development of Exmo_20.

Just one of many examples are Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies have shown that these birds fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location.

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. The development would absolutely NOT support any increase in biodiversity, instead hugely reducing it. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location where existing biodiversity would not be negatively impacted.

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)

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01.2025) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location that will not affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017 (including SAC/SPA).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The proposed site of Exmo_20 is along the boundary of Pebblebed Heaths Nature Reserve. The Pebblebed Heaths Conservation Trust was established by Clinton Devon Estates in 2006. Its creation was in response to increasing national and European recognition that lowland heathlands are a habitat rich in wildlife, are highly threatened, and require professional management to maximise their wildlife value.

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath.

The entire proposed site of Exmo_20 is currently home to a large variety of wildlife (some of which are protected species) including woodpeckers, bats, fox, deer, dormice and buzzards to name but a few. This proposal would lead to a destruction of their natural habitats and have unknown but certainly negative impact on the neighbouring nature reserve and on the local ecosystems and ecology, reduce air quality, increase light pollution, increase flood risks, and see a significant decline in local biodiversity. In addition there will be the potential pollution from construction activities.

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

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or even no harm to the Pebblebed Heaths Nature Reserve (SAC/SPA).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ·Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, what is now green fields and historic woodland with an abundance of wildlife will be replaced with 700 houses and roads, a 'comprehensive development scheme' within a rural part of East Devon.

The rural, natural site is currently home to a large variety of wildlife (some of which are protected species) including woodpeckers, bats, fox, deer, dormice and buzzards to name but a few. This proposal would lead to a destruction of their natural habitats.

The development of Exmo_20 would have a very negative effect on the local ecosystems and ecology, reduce air quality, increase light pollution, increase flood risks, and see a significant decline in local biodiversity. In addition there will be the potential pollution from construction activities.

Turning natural drainage into a concrete jungle, particularly with huge numbers of trees being removed, invites a severe flood risk and with the issues South West Water are currently facing with sewerage this will only enhance the issue.

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ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. With all the additional people coming to live in Exmouth there will be excessive strain on an already bowing services.

Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. GPs in Exmouth are already facing wait times of 3+ weeks to acquire an appointment. Similarly does not have enough Police resource to cover the current requirements of the town without extending the size dramatically.

The proposed development on Exmo_20 does not include provision for another primary or secondary school - within the last 3 years numerous Exmouth children have had to travel 30-40 mins to attend school in Cranbrook due to there being no capacity at Exmouth Community College. The original plans for the nearby Goodmores development included a primary school which has yet to even begin development, further increasing strain on local schools.

The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has. Other developments have added significantly to the sewerage problem in recent years. The Goodmores Development (off

Dinan Way in Exmouth) is not anywhere near finished so the impact that will have on the town, in the short and long term, is unknown. However, increased flooding and sewerage issues have increased since the build went ahead.

Maintaining access to essential amenities and services is crucial for the well-being and quality of life of existing residents.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: · Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location.

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ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan.

The proposed location on Exmo_20 and its distance from amenities means that there are no viable options to create sustainable travel alternatives to using cars. Research findings around the distances from the site to local services show that using cars will be by far the preferred choice of transportation for residents which directly contradicts Policy TR03.

Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no direct access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard.

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)

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. With a large development of around 700 homes and noting the UK average of 1.29 cars per household, the proposed development would lead to around 1000 additional cars hugely increasing congestion and pollution in the area which directly contradicts Paragraph 11.2.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location close to existing amenities and transport links.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far.

It will also be a difficult location for those without car access and cause social exclusion.

It is also worth noting that the existing infrastructure of the surrounding roads is not capable of accommodating the increased demand that Exmo_20 would cause. Access for buses, which would have an increased demand, would also be very difficult. A bus service through Meadow View Road (next to the proposed site) was cancelled a few years ago for this very reason proving this is not a sustainable option. From a safety concern Emergency Vehicles such as Fire Engines and Ambulances would without doubt have access issues.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. The minimum walk to the nearest shop is 20-25 minutes.

There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan in favour of more suitable locations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, the proposed development of Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. It is closer to neighbouring towns than the centre of Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth, directly conflicting with the policy SP01. Any development here will be a long distance from the town such that it is an unsustainable location.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan, instead look to develop much smaller sites closer to the principal centre of Exmouth OR other sites across East Devon.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the propped site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Anna Oldroyd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It

would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Don't go for the easy and cheap option of building on green belt land. Find a previously used site, such as a derelict/demolished house, car park. Or even better, go down the much harder, less environmentally destructive route of wondering why we are building homes for a population with a decreasing birth rate and address the cause for an increasing population despite this. Once developments are in place, they are never reversed. I honestly cannot believe that housing would be even contemplated so close to our pebble bed heaths.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Timothy Osullivan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This area of land is considered to be the natural transition between the town and the common land , in destroying it means it will alter the common land in all respects. The landowners have already ruined the Maer Valley and this will only result in another great loss which will also result in complete over population of the area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It would be better to just extend Littleham instead .

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: COMPLIANT'. Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lympstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lympstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of NPPF Chapter 3

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local

Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lypstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: HERITAGE / ST JOHN IN THE WILDERNESS CHURCH Submit this under chapter 5 - policy SD01. Select ‘No’ to being sound. Allocation of Exmo_20 is in conflict with policy HE02 which requires that proposals for development are sympathetic to listed buildings and their settings. A development the size of Exmo_20 and its suggested extension to the surrounds of St John in the Wilderness Church (grade II* listed) will have huge deleterious impacts on the remote, ‘wilderness’ setting of this important heritage site.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd

choice' site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lypstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: INCREASED FLOOD RISK Submit this under Chapter 5 - policy SD01. Select ‘No’ to being sound. Allocation of Exmo_20 is in conflict with policy AR01(B) as it will significantly increase and exacerbate flood risk to neighbouring areas. The significant levels of proposed development on a steep site that is upstream of Exmouth and drains into the Withycombe Brook is of serious concern to current residents who already note the added volumes and rates of flow on the brook, with implications for erosion, flooding and risk to life when managing (see attached photograph from winter 2024/25 – the stream is typically ankle deep). There is a lot of existing natural and physical infrastructure along this brook that cannot accommodate increased run-off from the adjacent areas (e.g., woodlands adjacent to and access roads over the stream). Increased flooding would damage mature trees next to the stream and cause water logging of gardens and 1 acre of mature wildflower meadow in our property. Furthermore, water flow over winter is already noticeable increasing in intensity and will

continue to do so with climate change all of which would be significantly exacerbated by such extensive proximate development

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lypstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
NATURAL ENVIRONMENT

Allocation of Exmo_20 is in conflict with PB01 and its proposed mitigation strategy. The Regardless of any proposed buffer the sites as a whole is still likely to have a direct and indirect adverse impact on the sensitive and unique Pebblebed Healths, which are nationally and internationally designated sites (SAC/SPA). Exmo_20a in particular was a recent addition to the Local Plan proposal (with the most direct impact), suggesting that alternative sites are available but were only excluded because councillors in other towns fixated on this site as a single, large-scale solution. Exmo_20 is in conflict with OL09 that states that permission will not be given for developments which result in pollution that cannot be adequately mitigated. The lack of connectivity between Exmo_20 and accessible and safe walking, cycling and public transport (train) will lead to additional use of vehicles and their concentration along B3179. The Habitats

Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. Developments at this site would not be able to sufficiently mitigate for this impact. Exmo_20 is in conflict with paragraph 2.10 of the Local Plan and objective 8 to “protect and enhance our outstanding natural environment and support an increase in biodiversity”. The site is teeming with wildlife (bats, birds, foxes, deer, badgers), insects, flowers and mature trees, as well as being adjacent to SAC/SPA/SSSI locations. The scale of the proposed development (700 + houses) would not allow these adverse environmental impacts (biodiversity and carbon emissions) to be mitigated onsite or through alternative sites for Biodiversity Net Gain and NetZero obligations. Exmo_20 is in conflict with paragraph 13.23 of the Local Plan, which recognises that East Devon has a fragmented landscape of natural habitat and need to maintain habitat connectivity for its biodiversity. The Exmo_20 area connects habitats and provides wildlife corridors between the Pebblebed Heaths and the southern woodlands. We often see wildlife traverse our property and the adjacent fields and woodlands. Our property adjacent to the proposed Exmo_20 has bat roosting, evidence of badger activity and frequent deer transiting up and down the stream. Previous ecological studies are available if required. Moreover, the site lies within the 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network part of the Local Nature Recovery Strategy, which would be entirely disrupted by development within Exmo_20. Finally, the designation of the East Devon Heaths SPA is based on qualifying features / species such as the Nightjar which has a range of 7Km from nesting to feeding grounds. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 is in conflict with paragraph 13.9 of the Local Plan which aims to protect irreplaceable habitats and important features. The proposed site contains the pebblebed heaths, significant numbers of mature trees, important waterways and long-standing hedgerows that would be “technically very difficult (or take significant time) to restore, re-create or replace once destroyed” (National Planning Policy Framework). Exmo_20 is in conflict with OL01 which prohibits development that would “harm the aesthetic and perceptual factors such as “tranquillity, wildness and dark skies”. The location of the site, its scale and the added vehicle traffic along B3179 would damage all of these important features of this rural location on the outskirts of Exmouth. Notably, the pebblebed heath (SPA/SAC/SSSI) and St John in the Wilderness church would be adversely impacted by the loss of dark skies, tranquillity and wilderness. Our property adjacent to the proposed Exmo_20 has approximately 1 acre of mature wildflower meadow, bat roosting, evidence of badger activity with deer transiting up and down the stream. Previous ecological studies are available if required.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lypstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: COALESCENCE BETWEEN BUDLEIGH AND EXMOUTH Submit this under Chapter 5 - Policy SD01. Select ‘No’ to being sound. Allocation of Exmo_20 is in conflict with policy OL05 as it encourages settlement coalescence. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The High Street, Doctor’s surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lympstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004.

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.: Exmo_20 needs to be removed from allocation in the Local Plan as legal compliance cannot be re-gained retrospectively.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
UNSUSTAINABLE LOCATION

1. Allocation Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. New development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth.

2. Exmouth_20 is in conflict with Local Plan paragraph 11.6, which suggests new developments within 800m of key services and facilities should be feasible in larger settlements and developments. This is not the case for current housing surrounding the proposed Exmo_20 site and would not be the case for any new development in that area. The only facility within walking distance currently is Bassets Farm primary school (and Exmo_20 would be further away from this). No other facilities or services (shops, vets, doctors, dentists, garages) are within 800m so walking is not an option. Nor are the cycling routes safe enough to allow from this mode of transport from the area.

3. Exmo_20 is also in conflict with Local Plan paragraph 3.34 which assumes that Tier 1 settlements provide sufficient existing infrastructure and services. This is not the case in Exmouth which has well established limitations in critical services including the secondary school, sewage infrastructure and doctors and dentists. The proposed development would not address these key deficiencies in local infrastructure and services.

4. Exmo_20 is in conflict with policy TR01, TR03, Local Plan paragraph 11.2 and the National Planning Policy Framework which requires East Devon District Council to focus “significant development on sustainable locations that reduce travel needs and offer transport choices”. This planned location is more than 1 - 4 miles from critical central infrastructure (including local employment and the train station). Residents will be reliant on car travel (which will add a significant burden with over 700 houses proposed), with access routes into and out of the site requiring people to travel around the site before heading into Exmouth town centre. The site is not well connected to existing walking, cycling and public transport links that are already deficient for the surrounding areas and hampered by surrounding roads that are unsafe for cycling (Dinan, Salterton and Outer Ting Tong). Providing these within the site would not address issues of connectivity to the rest of Exmouth. Those without access to a car, particularly younger and older generations, will find living in this location challenging and exclusionary. In accordance with TR03, this would mean that even if Exmo_20 was included in the Local Plan, planning permission would not be granted because the development cannot feasibly mitigate for significant increases in vehicle movements particularly given the proposed scale of development.

5. Exmo_20 is in conflict with Local Plan paragraph 2.6 which states that only modest and sensitively planned development will be supported to ensure Rural East Devon retains its outstanding charm and character. This Exmo_20 is the among the most rural locations in Exmouth and this development is not modest or sensitive. The proposal put forward by the land-owners and developers for this site is false impression of a 700 house site, and is not in keeping with their track-record on development in Exmouth (e.g., Goodmores is not in keeping with a charming Rural East Devon).

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I do not trust the consultation and planning processes as they have evolved so far. I object to Exmo_20 inclusion on multiple grounds and believe that councillors who went against the advise of planning officers did so without due concern for policy consistency or legal requirements for legal compliance and duty to co-operate.

Full name: Janet Palmer

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: 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.: n/a

Full name: Stephen Palmer

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I fundamentally oppose the continual addition of substantial expensive housing developments on green field sites on the edge of Exmouth. There are many empty buildings in the centre town that could be redeveloped to provide the affordable housing required by local people. It is also clear that the amenities within Exmouth are at breaking point, especially sewerage and significant additional housing will only exasperate the current shameful situation. There are large businesses in locations like Withycombe and Pound Lane that should be relocated and replaced with affordable housing so that large, dangerous vehicles used by and delivering to these businesses are not sharing narrow roads with children walking to and from school, etc. if additional housing on the edge of Exmouth is unavoidable, care must be taken to retain green space within the town, not cramming in new houses into every corner possible, and developing additional parks, and safe cycle ways and walk ways.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Simon Pardoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_17 is on National Landscape land - this would set a terrible precedent

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_17 from plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ivan Parker

Other party name (if relevant): Richard Parker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should be located elsewhere where it would cause less or no harm to the Pebblebed Heaths.(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and at variance with the mitigation strategy. Exmo_20 would destroy the "tranquility, wildness and dark skies" of the countryside which is contrary to POLICY OL01 Developing Exmo_20 would destroy wildlife corridors and fragment and isolate habitats contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, mature and ancient trees and species rich hedgerows throughout the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to ... air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 conflicts with POLICY OL09 and POLICY PB04.

St. John's in the Wilderness is an ancient oasis of calm on the edge of the town. Exmo_20 would destroy this, drastically altering the peaceful setting which currently exists. This is contrary to POLICY HE02.

Exmo_20 is on the rainwater catchment area of Withycombe Brook. In the 1960s the area of Exmouth known as The Collony, parts of Exeter Road and the lower parts of adjacent roads such as Withcombe Road and Park Road were flooded twice in quick succession, causing much damage and loss. This flooding was substantially caused by

the run off of surface water down the Withycombe Brook valley.Exmo_20 would exacerbate the flood risk which already exists. This is in conflict with POLICY AR01B

Exmo_20 is isolated and people would have to travel much further than 800m to access existing key services and facilities, contrar to PARAGRAPH 11.6 It is too far from any town centre and too steep for people to choose eslking or cycling as their mode of transport. This is contrary to POLICY TR01 and it would increase reliance on car travel, thus increasing traffic congestion, in conflict with PARAGRAPH 11.2

The main access point to Exmo_20 is much closer to Budleigh Salterton than it is to Exmouth, making Budleigh its most convenient and accessible town so the services and infrastructure of Budleigh such as shops, Doctors leisure and sporting facilities would be the obvious first choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth contrary to POLICY OL05 of the Local Plan,

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Ideally Exmo_20 should be removed from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sian Parker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access site via Southern Wood. Southern and Meadow view road are not adequate enough to maintain the volume of increased traffic.

The recent impact of temporary traffic lights when gas was being updated caused congestion from Dinan way entrance and into meadowview, tailing back and around meadowview road and that was with just the number of cars that streets have now.

The removal of all trees from the brook area of Southern Wood will be a breach of the Forestry commission license.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The direct effect to us as residents.

Full name: Denise Christine Parker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan Do not access the site via the B3179 Do not access the site via Southern Wood Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Bethany Parr

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Exm_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

- ??Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality" (East Devon Pebblebed Heaths SAC/SPA).

- EXM_20 is in conflict with POLICY OL09 and POLICY PB04.

- EXM_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. I am also concerned about the sewage situation as the sewers are already struggling leading to illegal discharges into the rivers and sea.

- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The one lane road through Woodbury will not cope with this level of traffic. It is unsustainable development. It is isolated and people would

need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

- The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents. It is proposed as an Exmouth development but in reality will detrimentally impact Budleigh and Woodbury.

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.: Significantly reduce the size of the development proposed, and increase local infrastructure/ roads/ sewers to cope with the increased pressures. The entrance to the site should also be repositioned away from Pebblebedheaths.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: David Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed.

Full name: David Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via Southern Wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: NA

Full name: David Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: NA

Full name: David Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: NA

Full name: David Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: NA

Full name: Alison Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Over development of Exmouth, with no increased infrastructure

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As the builders,/developers will not increase the amenities required for Exmouth, to support this mammoth residential build

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 oppose the build, of the residential housing and the destruction of a cul-de-sac, as a through road? LOCAL AUTHORITY *** Personal details have been removed ***

DATE: 9th March 2025

Dear Sir

I am writing to object to the planning application ref: EXMO20a/20b St Johns, concerning the proposed new housing scheme, of (700 homes) with site access through Southernwood, (currently a Cul-De-Sac) and Meadow View Road. Having been at 1 Southernwood since July 1994, we feel that the planned access through the Cul-de-sac will have a detrimental impact on Lower Veiges Plantation, mainly on the wildlife in this area, covered under the Wildlife Countryside Act 1981, the habitat of various protected species in this area.

So we wish to object to the aforementioned application based on the following grounds.....

Wild Orchids “The Wildlife and Countryside Act of 1981 protects wild orchids in the UK under Section 13, which makes it illegal to intentionally uproot or destroy any wild plant without permission”

Yellowhammers Protected under the Wildlife and Countryside Act 1981 “Conservation status, Yellowhammers are a UK Birds of Conservation Concern Red List species. Their population has declined by 54% between 1970 and 2015. This is due to a number of factors, including the removal of hedgerows, the loss of winter stubbles, and the efficiency of modern farming machinery”

Otters Protected under the Wildlife & Countryside Act 1981, plus Conservation of Habitats and Species Regulations 2017 – “Planning authorities must consider the conservation of protected species and habitats when reviewing planning applications.

Depending on the potential impact of the development, the planning authority may require a survey to be undertaken”

Bats - in the UK are protected by law as European protected species (EPS) Legal protection- Legislation dictates that any structures or place which a bats use for shelter or protection are protected from damage or destruction whether occupied or not. This legislation has been incorporated into planning policies. This means that planning authorities have a legal obligation to consider whether bats are likely to be affected by a proposed development.

Ring Necked Parakeets – Protected by the Wildlife & Countryside Act 1981, these birds have been seen roosting and flying the with many magpies, they are now breeding successfully in the Veiges Plantation area This is just a very small list of animal/plants on the protected list to be found in the vicinity of Southernwood brook. Cul-de-sacs were designed for a small number of properties to enjoy quiet, safe area for outside play for children with low vehicle emissions, low traffic and most of all low traffic noise, this was the main decision in our choice for buying 1 Southernwood. The use of access through Southernwood (currently a Cul-de-sac) would increase: Excess pollution, excess noise, road surface damage, parking restrictions, a dangerous area for residents and dog walkers, desecration of the wildlife and the brook, loss of privacy, highway safety, nature conservation The residents and community residing under the proposed housing scheme feel strongly that this extensive housing development will also be affected due to the lack of infrastructure missing from Exmouth, SWW unable to support the area, due to the continuous failure of the current waste pumping stations, no fully managed Police Station for the excess crime that will incur, failure for new Dr surgeries, and waiting times for appointments will increase, we have no hospital, a problem with the NHS dental system, and most of all a necessity for a new infant and junior schools, not forgetting more nursery's for the 0-5 years to now accommodate the Governments free early years placements.

Regards *** Personal details have been removed ***

Full name: Hywel Parry-Jones

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

RESIDENT'S RESPONSE TO EAST DEVON LOCAL PLAN – 2020-2042 The East Devon Local Plan 2020-2042 document is an impressive piece of work in terms of scope and presentation. At 270 pages long this document is quite a challenging read for residents. I have concerns about some aspects that are woven into the sections on development in towns and villages, sustainable transport and landscape as they apply to the Exmouth area. The total number of houses to be allocated to East Devon is quite staggering - 2634 houses for Exmouth and Lympstone. The Plan does not clearly articulate why so many houses are required. It may be the new government policy to increase housing supply but there is no evidence of the council challenging the figures. Based on previous government's housing calculations that were applied around 15 years ago these must be considered as is suspect. The proposals for development at the West End and the possibility of a new community towards the Airport/Cranbrook makes sense but the worrying issue is the unrealistic plans for local communities and degradation of open countryside. Such an exponential increase in housing will be to the detriment of existing residents who will see their quality of life significantly degraded. The shortcomings of the A376 linking the Exmouth area to the M5 motorway and Exeter appear to have been omitted, as this issue has been for the past 50 years. This road is quite inadequate for the traffic flows resulting from current exponential housing developments, before additional transport resulting from proposed developments takes to the roads. It is amazing that the Highways Department in DCC continues to support housing development proposals. The prospect of not being able to do anything about this key transport artery should halt future major housing development in the Exmouth area apart from minor infill sites until road access is improved. Some of the issues raised here are equally applicable to encroachment into the green belt and the open countryside in other locations in East Devon. As a resident in Lympstone parish my focus is primarily on site Lympstone_07 because there is considerable history linked to this site going back some 15 years. It is an example of how the council has chosen to bypass the long-standing views of residents, the Lympstone Neighbourhood Plan and a previous ruling by the Planning Inspectorate in 2015. Site Lymp_07 In selecting this site

as suitable for Housing and Employment, East Devon District Council may have misinterpreted the provision of the National Planning Policy Framework (NPPF). Although this document was updated with minor changes by the incoming Labour Government, it did not change the protections afforded to green belt and development in open countryside. The site is not within the defined settlement boundary and is an example of inappropriate development. This site has been the subject of a number of planning applications, all of which were turned down during the period ca. 2010 to 2015. In this respect, the arguments against development have been well articulated and available in the public record. It is appropriate at this stage of the EDLP process to reinforce why the council should not have selected this particular site as suitable for Housing and Employment. The reasons are:

- **Location.** Lymestone_07 sits in the middle of the green wedge between Exmouth and Lymestone Village. It therefore falls into the category of 'open countryside'. The NPPF is very specific on development in the green wedge. In no way can this site be considered as grey-belt, which might have permitted the council to designate this as a site for development. By including this site as effectively in Exmouth the council is using this as a subterfuge to boost the housing totals for Exmouth.
- **Land Quality** - the fields are classified as Grade 1 Agricultural Land. These are the only tracts of land with this categorization remaining in the Exmouth area. Dating back to the tithe maps of the 19th century, the land has been used for arable crop -production such as barley, hay crops, pasture for stock-rearing and latterly maize; it has been cropped with maize for the past decade. It is not 'only just used for maize', as stated by a contributor at the strategic planning meeting, suggesting that this is not a valuable agricultural land. Maize is grown because it comes second in value to wheat crops. For this reason, the land owner has stipulated that the farmer who manages the land must grow maize exclusively. Were this directive not in force, the land could be used for wheat and barley as happens of the adjacent field to the north of the site boundary, and be subject to a crop rotation pattern which is best farming practice. An attachment (1) demonstrates the versatility of the land, a factor that reinforces why it should continue as productive agricultural land, rather than having houses planted in it. In the context of UK food security, this type of agricultural land should not be used for housing, particularly when the EDDC had other option of inferior land offered up by landowners for consideration. Environmental and Sustainability Versatile and very productive land. Conflict with 3.35 -3.37 Grade 1 agricultural Land
- **Environment.** Situated on the watershed above the Watton Valley, Site Lymestone _07 sits atop the watershed draining down the south flank of the valley. These fields hold a significant amount of water which, if built on, will impact flows into the Watton Brook in times of heavy rainfall. These events are increasing in frequency and intensity over the past few years and will continue with increased infrequency with climate change.

Images at attachment 2 illustrate the amount of water that accumulates on the fields and adjacent East Devon Way that passes between two of the fields during persistent heavy rain. Being on a high point, the site used to be visible from all directions. The development company that owns the land screened the fields with trees some 10 years ago to deal with the issue of visibility commented on by the Planning Inspector's report. The outstanding views over the Exe Estuary towards the Hadon Hills and the high ground north of Exeter are illustrated in the panorama at attachment 1. The trees are not protected ancient woodland and inevitably the narrow bands of conifers will be harvested if the site is developed in order to afford outstanding views to the high-value properties that will inevitably cover the site. The land functions as a conduit for wildlife, such as deer, badgers and of course foxes as illustrated in attachment 3.

- Sustainability. The site will not score highly for sustainability. There will be significant reliance on cars as residents go about their daily business. The site has been earmarked as having potential for 100 houses. This will result in somewhere in the order of 150 vehicles which will add to the flows along the A376, not including the vehicles that will provide essential services. It is wishful thinking that people will abandon their cars and opt for more environmentally means of transport to commute, shop, take children to school and go about other daily business - it just won't happen. Topographically, the site is not ideal for those of a less energetic disposition. It is 2 miles from Lymington Village and Exmouth respectively. The site is reached in all directions by a gradient that increases from sea level to 150 feet. Typical of roads in Devon some of the gradients are gradual, interspersed with more challenging sections, particularly for cyclists. A Stagecoach bus route passes along the A376 adjacent to the site in theory every 20 minutes. The reality is that there are frequent delays due to volume of traffic on this road, particularly during rush-hour. This unreliability, combined with a time-challenged younger population is not conducive to persuading residents to rely on this service for commuting, school runs and specific appointments. Site Exmo_23 This site is also located in the green wedge and many of comments made in relation to Lymington_07 apply. This is also a site that has been the subject of several planning applications that have been turned down, so the key objections to development are well documented. Adjacent to the National Trust land at Lower Halsdown Farm, any development would not be in keeping with the grain of existing properties in Courtlands Lane and will be visible from the south westerly direction, the coastal preservation zone, and will undermine the guarantees of the Coastal Preservation Zone and the Devon Landscape Assessment. Development will significantly increase traffic movement along a narrow country lane which is already inadequate for the volume and speed of vehicles using it and it affects the safety of residents and pedestrians using the East Devon Way. In the light of these issues that have been somewhat glossed over to justify the selection of these controversial sites, it is hoped that the Inspector will have a different perspective when he examines the detail relating to Lymington_07 and Exmo_23, - hopefully backed

up by a site-visit. Sustainability and Transport - Infrastructure A resident in Exmouth area for 50 years, in that time I have observed housing spill into the open countryside. This has not been in parallel with improvements in infrastructure. A major factor that should have inhibited development is the inadequacy of the roads radiating from Exmouth, particularly the A376. (I have failed to find a specific section relating to the A376 in this Plan using a word search, but I concede that it may be covered in a less transparent manner.) It is not possible to make any improvements to the road between the edge of Exmouth and Clyst St George. It is puzzling why the DCC Highways Department has never ruled that more housing should not be approved particularly in the context of the number of houses being proposed by the current plan. Assuming that every new house will have 1.5 cars this will lead to a significant number of vehicles on the roads. There are insufficient local employment opportunities for the number of houses proposed, so most people will commute to Exeter and other location in Devon and west Somerset. The topography of the Exmouth area persuades people to use their cars rather than use other means of transport. Other aspects of infrastructure require attention before any more development occurs. The sewage system is quite inadequate as witnessed over the past 9 months. Schools are under pressure as are the medical facilities. It may be relatively easy to construct the infrastructure but the means to find enough suitably qualified professional staff is much more challenging. Conclusion With proposals to expand Cranbrook and the prospect of a new community it should be unnecessary to approve development in the open countryside in the vicinity of towns and villages in East Devon. The number of additional houses proposed is quite extraordinary and most residents are already concerned about existing development and the impact on infrastructure, particularly the very unsatisfactory and overwhelmed road links. The council must resist pressure from developers who I suspect have already exerted pressure on the council to include the controversial sites. Once valuable agricultural land is built on it is lost forever.

Full name: Florence Pauly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach, etc.) would be the most convenient choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLIC OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

Full name: Christine Pearce

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located at an alternative site where it would cause no harm to the Pebblebed Heath(SAC/SPA).Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. It would fragment and destroy habitats and wildlife corridors ,contrary to Paragraph 13.23 of the local plan. Exmo_20 would increase the amount of traffic ,causing congestion.People would need to travel much further to existing key services and facilities,contrary to paragraph 11.6.The infrastructure is not there for schools,GPS etc . The Main Access point is in a dangerous position.No buses go this way.Everyone working in Exeter will drive through Woodbury causing a major increase in traffic and pollution.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mrs Susan Pearl

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This proposed development will cause harm to the countryside, the Pebbled heaths and I believe it is not in accordance with the strategy set out in Policy PB01. It will also ruin the 'dark skies' of the area and will destroy veteran trees, wildlife habitats and the hedgerows which are so essential to resident wildlife and air quality which I believe is contrary to Paragraph 13.9 Exmo_20 will increase traffic congestion on an already heavily used country road which is not suitable for the traffic it already has to carry. The services and infrastructure such as doctors, schools, and public transport will be insufficient for the extremely heavy load that this proposed development will impose on the area. Budleigh Salterton will be heavily affected and I believe the services the town has will be put at breaking point. The B3179 is the only road to get to Woodbury, Woodbury Salterton and Exeter and the Idea that cycling and walking routes would be developed is ludicrous considering that the majority of residents in Budleigh Salterton and over retirement age and cycling up a hill to get to key services is unacceptable.

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.: My suggestion is that Exmo_20 be either removed from the plan or the size of the Exmo_20 be reduced dramatically or change the B3179 as the access. I also believe that a previous proposal of Exmo_20b would be preferable.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I wish to see how Local Government discusses these proposals.

Full name: Sacha Pemberthy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Paragraph 2.9 refers to protecting the environment yet figure 3 shows over 1,400 new homes planned for Exmouth where existing infrastructure is already failing resulting in continual sewage overflows. This inconsistency in the vision means the vision is undermined and flawed from the outset. The vision needs to include specific reference to new sewage infrastructure as without that the situation that happened at Cranbrook will repeat.

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.: Include a new 2.9 subsection a to reference requirement for upgrade to existing and provision of new sewage infrastructure and explain how the overdevelopment in Exmouth will be delivered without choking the environment and resources.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No ti does not set out just how essential cooperation with the water authorities is. Without a requirement to deliver updated infrastructure hardwired into the vision the existing dire situation with sewage will become completely

untenable. Simply put NO houses can be built without this being delivered first and the plan MUST reflect this throughout. Anything less is a derogation of duty.

Full name: Heather Pentel

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This would put a further strain on on both Exmouth and Budleigh Salterton for schools doctors dentists services roads sewerage etc

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Amanda Pettit

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
?EXMO_20

LOCATION ISSUES The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

NATURAL HABITATS Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to

PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICYOL09 and POLICYPB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

VEHICLE ACCESS AND INCREASED TRAFFIC FLOW Exmo_20 would increase the need for car travel, contrary to Figure7–the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

FLOOD RISK Development of Expo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified down stream flood risk . This is in conflict with POLICY AR018. This Area (Withycombe Brook through to Exmouth, which is already under the pressures. of climate changes.

HERITAGE PROTECTION Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Expo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jackey Phillips

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the

Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to

POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways

ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY

AR01B. ? Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is

isolated and people would need to travel much further than 800m to existing key

services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from

any town centre for people to use walking or cycling as their choice of transport. This is

contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to

Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan, ? Reduce the size of Exmo_20, ? Do not access the site via the B3179, ? Do not access the site via Southern Wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rachel Philp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To air our concerns

Full name: Charles Pinnock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: EXMO 20, if implemented will vastly increase traffic in the area. This will be exacerbated by the absence of facilities as the residents have to travel to either Exmouth or Budleigh Salterton to access them. Budleigh Salterton being the nearest location for the residents of the proposed development to access facilities would disproportionately suffer increased traffic and congestion. Additional traffic would be forced into Budleigh Salterton using Exmouth Road which lacks the basic provision of a pavement exposing pedestrians to very real danger between Knowle and Clyst Hayes Gardens.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The residents effected by the proposal have in reality had comparatively little time to express objection to the development.

Full name: Claire Pittard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access to and from Exmo_20 is closer to Budleigh Salterton than Exmouth making Budleigh the obvious choice for services and shopping facilities for future residents of Exmo_20. This would lead to a coalescence of Budleigh and Exmouth contrary to Policy OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Access Exmo_20 via another route than the B3179

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

Full name: Claire Pittard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would negatively impact irreplaceable habitats, veteran trees and species rich hedgerows, contrary to paragraph 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20 and create a significant buffer.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

Full name: Claire Pittard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should be relocated on an alternative site where it would cause less/no harm to the Pebbled Heaths (SAC/SPA). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in line with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Significantly reduce the size of Exmo_20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

Full name: S Platts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmouth already struggles with infrastructure. Drainage and other services, GPs, dentists and the availability of local shops, etc. Until and unless this is rectified to meet current needs the introduction of an additional 1,450 will only make an already poor situation worse.

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.: Improve local infrastructure, including drainage, local shops and amenities, schools, dentists and GPs ahead of any future development.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It doesn't seem to matter how or when objections are raised, still the push for more housing continues, whether it will work for the existing community or not.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: helen playfair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This is a site of historical and environmental significance. it would cause significant permanent damage to the surrounding protected countryside as it is immediately next to the boundary. this will bring significant increase in traffic, pollution and noise to this area and the access road and infrastructure cannot support this. there is already significant congestion from increasing traffic along this road which will impact on pinch points including woodbury, darts farm, clyst st mary and sandy park traffic budleigh salterton is the closest town and cannot support this size new development. it will negatively impact st john in the wood historical sites this development would be much better placed on an accessible piece of land closer to the main routes out of devon

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.: completely remove Exmo_20 from the local plan as it will devastate the locality

Full name: Helen Plumridge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposal at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebbled Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy,

Exmo_20 would destroy the "tranquility, wilderness and dark skies" of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, and veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulation Assessment (30.1.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to....air quality (East Devon Pebbled Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmou_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmou_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmou_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Emma Ponti

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Please, please take Exmouth residents opinions into consideration. We need your support.

Full name: Tamara Powderley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Timothy Pratt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: With regards to development EXMO_20, the main access appears to be along the B3179. This is at the very top side of Exmouth, meaning that residents would need to double back down into Exmouth via St Johns Road, Marley Road or Hulham Road to reach all services in Exmouth. Indeed the services in Budleigh are actually closer and would likely become the preferred choice for residents. This will likely bring the two towns even closer together which is contrary to Policy OL05 of the local plan.

EXMO_20 is literally across the B3179 where the SSSI Pebblebed heaths start. This would be contrary to the HELAA, the site selection methodology and policy PB01 of the local plan.

EXMO_20 wraps around St John in the Wilderness grade II* listed church which will degrade its rural setting for worship and burials contrary to policy HE02

The land designated for EXMO_20 occupies the highest parts of Exmouth and as stated above borders onto Withycombe Raleigh Common/Woodbury Common. The development of 700+ homes will eliminate the "tranquility, wildness and dark skies" which is contrary to policy OL01

EXMO_20 will break apart habitat and wildlife corridors that exist between the land to the east of the development and the woodland (Big Wood) to the west of St Johns Road, and of course the Common to the north. This is contrary to paragraph 13.9

EXMO_20 conflicts with policy OL09 and policy PB04 as the habitats regulations assessment dated 30th January 2025 states that there is "currently not sufficient certainty to rule out adverse effects in an integrity in relation to..air quality (East Devon Pebblebed Heaths SAC/SPA) such that the plan fails the integrity test. The proposed main site access is opposite that SAC/SPA.

It is understood that the subsoil underneath the majority of EXMO_20 is heavy clay, which will not provide adequate drainage for rainwater. This is likely to cause potential flooding via Withycombe Brook, which has already been identified as under pressure. This conflicts with policy AR01B

As already stated EXMO_20 is remote from the main town of Exmouth, with its main access on the B3179. This can only increase traffic congestion on the routes stated above because there is no public transport to that area of Exmouth. Few residents will make use of sustainable travel such as walking or cycling, not just because of distance to services, but the fact that it's uphill! There are no pavements or cycle paths on the immediate access routes and the B3179 in that area is a fast road. This can already be evidenced by the number of cars that park at the football pitches opposite during matches. Cars can often be seen parking on the visibility splay or even the road. These are all contrary to paragraph 11.2, 11.6 and policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan, reduce it in size, nearer the main town, with access lower down. Revert to EXMO_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Colin Pratt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The

access point of Exmo_20 is much closer to Budleigh Salterton than Exmouth, this makes Budleigh the most accessible and convenient town. The services and infrastructure of Budleigh are already overstretched(the Doctors, High Street, School etc) and would be the obvious choice of the residents of Exmo_20. this would undermine the settlement hierarchy and would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan. An alternative site to Exmo_20 for housing allocation should be selected, one which is deemed available, achievable and suitable in the HELAA. Exmo_20 would also cause harm to the adjacent Pebble bed Heaths(SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PD01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would also cause harm to heritage assets. this is in contrary to POLICY HE02. Nearby wildlife sites would be adversely affected and destroy the " tranquillity, wildness and dark skies " of the countryside contrary to POLICY OL01. Exm0_20 development would also be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees, and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to Air quality(East Devon Pebblebed Heaths SAC/SPA) such that the plan fails the integrity test. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. this is in direct conflict with POLICY AR01B. Exmo_20 would also increase the need for vehicle travel and increase traffic congestion, in conflict with PARAGRAPH 11.2 This isolated location is unsustainable development as people would need to travel much further than 800m to

existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far(and to steep) from any town centre to use walking or cycling as their choice of transport . this is contrary to OLICYTR01.

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.: Therefore remove Exmo_20 from the local plan and revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Colin Pratt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Joan Preston

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would put pressure on the area's already failing and inadequate infrastructure. It would increase the need for travel by car and add to the already congested roads in conflict with PARAGRAPH 11.2. It is isolated and unsustainable development. Residents would need to travel in excess of 800m to access key services and facilities, contrary to PARAGRAPH 11.6. Walking/cycling are not feasible options due to both distance and terrain from any town centre. This is contrary to POLICY OL05 of the local plan.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay thus making soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

St John in the Wilderness Grade II listed church and churchyard sits in an oasis of tranquillity for worship which currently exists for the congregation. Exmo_20 would have immense negative impact on this. This is contrary to POLICY HE 02.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mike Prudence

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: MRS ELIZABETH PYE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_08 & Exmo_16 goes against policy OL04 which states that the “ visual integrity , identity and scenic quality should be preserved”. This development would impact on the Maer valley which previously has been identified as an important green space corridor.

In Chapter 13 – Biodiversity states the biodiversity or wildlife value is greater than before the site was developed. Exmo_08 & 16 would go against this policy as development would reduce biodiversity. The land in question frequently has wildlife species including deer, foxes, and a wide diversity of birdlife.

Exmo_08 & Exmo_16 goes against Policy OL10 which aims to “conserve and protect the highest grade of agricultural land” as it would develop on a site of high quality agricultural land. In the Chapter - Our Outstanding Landscape the policy is very clear that the loss of high quality land should be resisted.

In respect of Exmo_08 and Exmo_16 (combined) it is stated that the preferred access would be off Parlour Meadow with a less preferred option of Elm Lane. Currently there is often severe traffic congestion on and around the main access road leading into Engineers Way / Parlour Meadow development. This access road (Pankhurst Close) provides access to numerous businesses including a scrap metal merchant, builders merchant, car repair workshop, printers, scaffolding company and joinery workshop along with a number of other businesses.

It is our opinion that providing access to another circa 45 dwellings would further increase the chaos that ensues at peak times of the day. This access would need to cope with not only the increase in cars for the houses but also the service vehicular access, delivery and lorries requiring access to the site.

As a result we recommend that other access options should be explored such as improvements to Elm Lane to enable the lane to be considered as a viable option.

Exmo_08 & Exmo_16 would go against the Policy TR01: Prioritising walking, wheeling, cycling and public transport. Due to the topography of the local area, residents are more likely to use their cars to access the local shops. The nearest convenience store is at Littleham Cross and this is already an area where there is minimal parking with cars frequently parked on double yellow lines at / near the junction.

There is a potential of increased flood risk with development of Exmo_08 & 16 due to increased run off from the site, which will impact on Littleham brook, going against Policy AR01.

The text has been extracted accurately, with highlights and formatting preserved where applicable. Let me know if you need further assistance!

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MRS ELIZABETH PYE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heath (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MRS ELIZABETH PYE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmouth_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors surgery, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MRS ELIZABETH PYE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmouth_20 is significantly closer to Budleigh Salterton than Exmouth, making Bidleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors surgery, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MRS ELIZABETH PYE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development at Exmo_20 should be located at a different site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9

The habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to - air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICYOL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St Johns in the Wildeness Grade II listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to Policy HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe brook, on a subsoil of heavy clay which makes soakaways ineffective. It

would exacerbate the identified flood risk through the lower lying land at the bottom of Withycombe. This is in conflict of Policy AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. It is an unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to paragraph 11.6. It is too far & too steep from either town centre for people to use walking or cycling as transport choice. This is contrary to Policy TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh e.g the High Street, Doctors surgery, school, beach would be the obvious choice for residents of Exmo_20. This would be contrary to Policy OL05 of the local plan due to it leading to coalescence of Budleigh and Exmouth.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 or reduce size considerably.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Charles Isaac

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point to the site area Exmo_20 is much closer to Budleigh Salterton than Exmouth. This means Budleigh is the most convenient and accessible town for future residents of the development. The future residents of Exmo_20 would therefore choose to use the services (Doctors, High Street shops, Schools, parks and beaches) in Budleigh and this would undermine the settlement hierarchy and would lead to the merging of Budleigh and Exmouth which is contrary to Policy OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which is deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to it being a supporting foraging habitat. Developing Exmo_20 is contrary to policy PB01 of the Local Plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to the heritage assets, most notably St John in the Wilderness a Grade 2* listed church and church yard, drastically altering the attractive rural setting for worship, weddings and burials which currently exist. This is contrary to Policy HE02 Exmo_20 would have a very detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside which is contrary to Policy OL01. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * ??Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. Exmo_20 proposes the development of 700 homes so would add another 2500 to 3000 people to the local population. The schools and doctors surgeries serving the town are

already overwhelmed by demand for services . Where will the new residents go to school or get to see a doctor?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20 should be removed from the Local Plan as a potential housing site for all the reasons set out in 3B above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: paul jenkins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This part of Devon currently fails to support the current housing and residents in terms of inadequate infrastructure - The road system , and road network around the development would grind to a halt, the highways cannot maintain the current network with low traffic volumes. It pure insanity to consider dropping 700 houses in the middle of this fragile road system. It has been well documented the current sewage system in and around Exmouth/Budleigh cannot cope, with spills into the sea together with constant sewage back ups in houses and flooding a regular occurrence. Again how can any sane council or developer consider the addition of 700 new houses linked to an already ' not fit for purpose ' sewage system would be a good idea or worthy of approval. This proposal would also : Harm protected heath and woodland impact on wildlife , deer activity , bird life, insects, wild bee colonies , Adder and Reptiles. Destruction of historic and ancient trees , hedgerows , and habitat. Local services in terms of schools , Gp surgeries are not able to cope with current workloads ,how and where would potentially over 1500 new residents be able to obtain these services - there is no extension of schools or other necessary infrastructure policies in place to cope or deal with such a significant increase of the local population.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There is no modification that would make this proposal workable without a multi million upgrade of the sewage system , local services and road network. There is no funding available for

the above and unless the developer as part of a part 36 agreement is prepared to submit a £30m to £40m contribution to cover this shortfall in services/infrastructure and local services it has no credibility and should be rejected.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: please see previous comments

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.: Yes, because out of control development where no investment to the wider area in terms of infrastructure improvements to accommodate new residential expansion needs to be stopped

Full name: Douglas Kenny

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient accessible town. The services and infrastructure of Budleigh (shops, Doctor's, school, beach ect) would be the preferred choice for residents of Exmo 20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

Exmo 20 would increase the need for car travel and and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable devepopment as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Do not access Exmo 20 area from the B3179.
2. Access to the site should be off of Dinan Way which would give safer and a more direct to the A376 Exeter Road.
3. Reduce the size of Exmo 20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Tom Kinnersley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo 20 is in conflict with OL05. From its access point the centre of Budleigh Salterton is half the distance to Exmouth and it is inevitable that the facilities there will be used in preference to Exmouth. A development of this size would both lead to and encourage coalescence.

Full name: Tom Kinnersley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo 20 is in conflict with paragraph 11.2 of the local plan. It is so isolated that car use would be essential thus increasing traffic. It is also contrary to 11.6 because it is nowhere near services and facilities. Walking and cycling could not possibly be the choice of transport - contrary to Policy TR 01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo 20, do not access the site from the B3179 and find a way to reduce the distance to Exmouth town centre.

Full name: Tom Kinnersley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo 20 is in conflict with policy SP01. Exmo 20 is completely detached from Exmouth and cannot be considered to be a development of a tier 1 town

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo 20b as previously proposed

Full name: Mrs Helen Lester

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I believe that the proposed development of site EXMO_17, which by its very nature will mean an extension of Exmouth eastward on the currently undeveloped East Devon National Landscape (formerly AONB) towards Budleigh Salterton. Inclusion of EXMO_17 in the East Devon District Council Local Plan fundamentally fails the "Consistent with national policy" soundness test due to severe conflicts with statutory protections, national planning policy, and local policy obligations.

1. Direct Conflict with National Planning Policy Framework (NPPF) The National Planning Policy Framework (NPPF) provides unequivocal legal protection for National Landscapes: Paragraph 176: The highest level of protection must be given to conserving and enhancing landscape and scenic beauty in National Landscapes. Development should be strictly limited in these areas. The proposed extension fundamentally contradicts this principle, as it represents large-scale urban encroachment into a protected landscape. Paragraph 177: Major development in a National Landscape should be refused unless it passes exceptional circumstances tests and is in the public interest. This proposal fails every test: No overriding need: Housing or economic growth objectives do not constitute exceptional circumstances, particularly when alternative sites exist outside protected areas. Alternative locations exist: Other areas within East Devon can accommodate growth without violating protected land status. Severe environmental and landscape harm: The development irreversibly damages the area's ecological integrity, scenic character, and ecosystem services. Legal Precedent: High Court rulings have consistently upheld AONB/National Landscape protections, ruling that "economic development" or "housing targets" do not override statutory protection. The approval of this proposal would invite an immediate legal challenge.

2. Breach of Statutory Duty Under the Countryside and Rights of Way Act 2000 (CROW Act, Section 85) Section 85 of the CROW Act places a mandatory legal duty on public authorities to conserve and enhance the natural beauty of National Landscapes. Any decision that fails to give "great weight" to protection is unlawful. By approving this proposal, East Devon District Council would be in breach of this duty, making the plan legally indefensible and subject to judicial review.

3. Direct Contradiction of the East Devon Local Plan and Policy Framework The proposed extension also fails to comply with East Devon's own planning policies, making it internally inconsistent and thus unsound: Strategy 46: Landscape Conservation and Enhancement and AONBs Requires that development must enhance, not harm, the special qualities of National Landscapes. The proposal would cause irreversible harm, violating this policy outright. Policy D1: Design and Local Distinctiveness Development must respect and protect local landscape character. The urban expansion into protected countryside undermines the distinctive rural and coastal identity of Budleigh Salterton and its surroundings. Urban Sprawl Prevention & Settlement Separation The merging of Exmouth and Budleigh Salterton is a serious planning concern. National and local policy explicitly protect the distinctiveness of settlements, ensuring they are not lost to uncontrolled expansion.

4. Environmental Destruction and Irreversible Harm The East Devon National Landscape is one of the most ecologically valuable and visually iconic landscapes in the UK. Development would result in: Biodiversity loss: This area hosts legally protected species and priority habitats under the Wildlife and Countryside Act 1981 and the UK Biodiversity Action Plan. Destruction of irreplaceable ecosystems: The undeveloped land acts as a natural carbon sink, floodplain, and wildlife corridor. Increased climate risk: Removing these natural defences increases flood risk, reduces climate resilience, and worsens ecological degradation.

5. Legal Risk of Judicial Review and Government Intervention This proposal is legally indefensible. If included in the Local Plan: It is highly likely to be legally challenged under the CROW Act and NPPF non-compliance. Past judicial reviews have struck down developments in National Landscapes where local authorities failed to provide a lawful justification. Conclusion: The Local Plan is Unsound and Legally Indefensible This proposal directly contradicts national policy, breaches statutory duties, violates East Devon's own Local Plan, and would likely be overturned in court. To remain legally compliant, policy-consistent, and defensible, East Devon District Council must exclude this proposal from the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: EDDC should not pursue development in EXMO_17 because they would breach planning law and ultimately would end up in years of litigation and only the Government has the power to change planning law, not EDDC.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jacqueline Lock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

Planning officer advised strategic planning committee exmo_20 was not suitable to be included in the local plan and gave good reasons for his recommendation Eagle Investments gave a presentation to the strategic planning committee on how Exmo_20 could be developed. Members of the committee from Lympstone recommended putting aside planning officers recommendation. Eagle investments are property developers who have built at Lympstone and advised strategic planning committee how the site Exmo_20 could be developed Sewage Infrastructure is already at Breaking point

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.: These sites need removing from the draft local plan

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

These sites need removing from the local plan as will have a destructive impact on local businesses connected to tourism as these developments will destroy the beauty of the area and be detrimental to the local environment this will have an impact on jobs in tourism and related industries that local towns depend on. It will also chip away at the green fields beauty of the local area that also contributes to tourism into the East Devon

area as a whole, So not meeting need for jobs in tourism and not meeting other areas need for jobs in tourism The sites should not have been included as they are near Pebble bed Heaths and Bystock lake and other areas of scientific interest In the case of exmo_20 the Planning officer recommended that the site was unsuitable for development with sound reasons this advice needs to be followed and the site should not have been included in the draft plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: These sites need removing from the draft local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Both sites are damaging to the environment and if developed reduce the natural beauty of the local area also will lead to increased footfall on Woodbury common and Bystock lakes Sewage infrastructure is already breaking down and insufficient for existing housing. Road access at Exmo_20 is onto the narrow road into Budleigh and access to the site is difficult Developments will increase traffic on the roads into Budleigh. Re Exmo_17 Traffic has already visibly increased on the Salterton Road with developments such as Plumb Park, The road into Budleigh from Exmo_20 is narrow with many hazards for instance there is a very tight corner at Inner Ting Tong this road is not suitable for heavy traffic flows Both sites reduce the green land between Budleigh and Exmouth

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Katherine Louise McDermott-Darley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal would lead to merged conurbation of Budleigh and Exmouth which is contrary to Policy OL05 of the Local Plan. Geographically and taking into account the minor road infrastructure, the main access point of Exmo_20 is closer to Budleigh Salterton than Exmouth. The already over-stretched local services and infrastructure would be the closest and preferred choice for residents and create an overburdened of demand on for example, the Doctor's surgery, underfunded primary school, public toilets, sewage systems, aggravated in the holiday season by incomers.

An alternative location for housing allocation should be selected, one which is available, sustainable and suitable in the HELAA. The harm to the Pebblebed Heaths and rare and protected habitats is contrary to Policy PB01 of the local plan. Exmo_20b would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II listed church and churchyard, drastically altering the attractive rural environment for worship and spiritual retreat. This is contrary to Policy HE02. Flood risk and fire hazards would be increased. The soak away system is already inadequate in current climate conditions with increased rainfall and intermittent drought. The impact on car pollution, congestion and accidents to pedestrians, walkers and cyclist would undermine the recreational attraction of this outstanding beautiful natural landscape. Increased traffic congestion would inevitably ensure contrary to Policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and ensure that traffic volumes along the B3179 and not increased.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Miller

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less harm to the Pebblebed heatjs {SAC/SPA} Developing Exmo_20 is contrary to the local plan and not in accordance with the mitigation strategy. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. It is unsustainable development and people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to Policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Michael Newby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To voice my strong objection to the plan on the grounds

that it will gravely damage the natural environment in St John's Road leading to the Pebblebed Heaths, to the rural setting of this area of Exmouth, and to the peaceful location of the church of St John in the Wilderness. It will cause noise and light pollution. It will impossibly increase traffic on a narrow road. It will cause irreparable damage to this precious part of Exmouth, spoiling part of the town's 'green lung' and, in the process, eroding the offer it makes to one of Exmouth's principal income streams - tourism. People come here for the combination of seaside and unspoiled green environment and not to visit another housing estate.

Full name: Jean Quinn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors' surgery, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. Exmo_20 would increase the need for car travel, contrary to Figure 7- the energy hierarchy- and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL05 of The Local Plan.

The main access point for this site is via the B3179. Which means that residents will have to travel between 4.2 and 4.3 miles to get to the centre of Exmouth, whereas the centre of Budleigh Salterton is only 2.2 miles.

This makes Budleigh Salterton significantly more accessible to the residents of this development for key facilities/services.

Currently Exmouth and Budleigh are separated in terms of functionality but this development would effectively merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

This is also a large site, so is Budleigh ready for this sudden increased demand?

(POLICY OL05: This policy stated that development will not be permitted if it could lead to or encourage settlement coalescence).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy HE02 of The Local Plan - Development at this site will encircle the Grade II* listed St. John in the Wilderness Church and will have significant adverse effects on the remoteness and tranquillity that is so unique to this church and its surroundings.

This development will result in the loss of a unique peaceful and tranquil setting, not only for the congregation, but also the numerous visitors that come to pay their respect's to their relatives in the churchyard, and also those that visit the area to see the church and its settings. (POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OLO1 of The Local Plan.

The site is noted for its dark skies, tranquillity and wildness.

The proposed site will encircle the Grade 1[*] listed St John is the Wilderness Church and churchyard, which will result in its tranquillity, remoteness and dark skies being lost forever, regardless of any buffer zone being provided.

Along with the new light from the proposed housing development itself, and with the main access for the site being onto the B3179, which is directly opposite the SPA/SAC/SSSI, this would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Pebblebed Heaths as vehicles exit the site.

POLICY OL01 states that development will only be permitted where it would not harm the aesthetic and perceptual factors such as "tranquillity, wildness and dark skies").

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 13.23. of The Local Plan

The whole of this site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network.

Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night.

Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of this SPA.

This site provides a means of connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of this site.

The amount and variety of wildlife that utilises this land and the nearby SSSI Pebblebed Heaths is amazing, and will be lost if this site is developed.

(PARAGRAPH 13.23. The Local plan states that East Devon has diverse but fragmented habitats and aims to enhance biodiversity increasing habitat areas and connecting isolated habitats).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with paragraph 2.10, objective 8 of The Local Plan.

This will result in the loss of a considerable amount of land that provides an abundance of biodiversity, both on site and on the adjacent SAC SPA/SSSI.

This will adversely affect the natural environment (PARAGRAPH 2.10. Objective 8.

This states the objective "To protect and enhance our outstanding natural environment and support an increase in biodiversity").

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy PB04 of The Local Plan.

The Habitats Regulations Assessment (dated 30.01.25) highlights that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)."

With the majority of the traffic from this site going via the B3179 which runs along the edge of the SSSI Pebblebed Heaths (SAC/SPA), the emissions/pollution created will undoubtedly have a 'negative' impact on the air quality in this area.

(POLICYPB04 states that proposed plans must not affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017 (including SAC/SPA)).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL09 of The Local Plan.

The The Habitats Regulations Assessment (dated 30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)".

The main access point for this site is via the B3179 which runs along the edge of the SSSI Pebblebed Heaths.

This will lead to an increase in emissions due to the increase in traffic, which will also have a huge 'negative' impact on the air quality.

(Policy OL09 states that "permission will not be granted for development which would result in pollution that cannot be adequately mitigated").

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with policy PB01 of The Local Plan and is not in accordance with the mitigation strategy.

The number of houses being proposed at this site will cause considerable harm to the SSSI Pebblebed Heaths .

There must be numerous alternative sites that could accommodate the housing requirement which would cause less or no harm to the SSSI Pebblebed Heaths (SAC/SPA).

(Policy PB01 states that development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless they cannot be located on alternative sites that would cause less or no harm).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 2.6 of The Local Plan

This site is classed as 'Rural East Devon' due to its position outside of Exmouth.

This development will destroy not only the open countryside within it, but will also destroy the setting of a grade II * listed Church and churchyard which is currently in the middle of it.

This is the largest development on Exmouth and if approved will destroy yet another part of Rural East Devon.

(PARAGRAPH 2.6 states that "Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with policy TRO3, and figure 7 in the Local Plan.

No new sustainable travel arrangements have been proposed for this site that are viable.

The site will not promote walking/cycling due to the fact that it slopes steeply from North to South.

The main access point onto the B3179 for this development will generate major amounts of vehicle movements just to access services within Exmouth and the neighbouring villages. This will also lead to an increase in travel to and from the main towns/cities, and access to the main route out of the area via the M5.

(POLICY TRO3 states that where development is likely to generate significant amounts of vehicle movements planning permission will not be granted unless they can identify measures to secure new sustainable travel arrangements, taking into account (amongst other things) the scale of development and the availability of public transport, and walking and cycling opportunities).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph

3.34 of The Local Plan

This site will not add any crucial infrastructure such as a secondary school, doctors surgery, of dentists surgery.

Its will only add to an already creaking infrastructure.

In addition to this, its will also increase the pressure on our sewage system, which already has major issues and is regularly closing down our beaches and areas on the Maer.

This has been highlighted several times on national news and via the press.

How long before Exmouth becomes a place to avoid?

(PARAGRAPH 3.34 states that by directing growth to the tier 1-4 settlements their approach ensures development is concentrated in areas with existing infrastructure and services).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with The Draft Local Plan which states that the access point for the majority of this site (if not all) be at the North of the site via the B3179.

This access point is approximately 4.3 miles from the centre of Exmouth and onto an already congested road that also is the main route in and out of Budleigh Salterton.

This is a busy route on a daily basis, and gets even worse in the holiday seasons. This will result in increased car travel requirements for the majority (if not all) of the site.

This proposed site is the largest in Exmouth, and its location does not promote less travel, nor will it do anything to reduce traffic congestion in and out of Exmouth.

This site cannot be classed as sustainable. (Paragraph 11.2 of The Local Plan promotes focusing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy TRO1.

This site slopes steeply from North to South, walking and/or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc. as the distances are too far.

The provision of walking routes, cycle paths or public transport will not alleviate the amount of car journeys this development would generate, especially taking into account the fact that the site topography, and the distance people will have to travel to access essential services/facilities.

(POLICY TRO1 proposes that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: In my consideration it is not sound as this site slopes steeply downhill from the North to the South.

Regardless of what the developer says, this will not promote walking and cycling. Key services and facilities for the bulk of this site are not within the stated 800m (approx 10 mins walk).

The likelihood is that residents will need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring towns/villages.

Who walks to do their main shopping, visit the doctors, dentists, etc?

This site is too isolated to be sustainable.

(Studies cited in the Local Plan show that people prefer to walk if their journey is not further than 800m/10 minutes walking each way)).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy SP01. This site cannot be seen as promoting the most significant levels of development as the principal centre of Exmouth.

This is the largest proposed development for Exmouth, yet the main access point for this site is via the B3179, which makes Budleigh Salterton town centre (at 2.2 miles away) over 2 miles closer than Exmouth Town centre.

This site cannot be considered to be a development in Exmouth and is an unsustainable location. (POLICY SP01 proposes to promote the most significant levels of development at the principal centre of Exmouth).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site criteria to be considered as a 'reasonable alternative' confirms that Exmo_20 cannot be a reasonable alternative as it failed the HELAA stage being deemed "not suitable or achievable" (HELAA Appendix E(v)1).

Its allocation is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: In my consideration it is not sound due to issues surrounding Climate change and carbon emissions.

A reference was made to “Development that minimises the need to travel by providing access to public transport, and cycling tracks.”

Allocation of Exmo_20 would not minimise the need to travel, as it is in an unsustainable location with the main site access point now out onto the B3179 country road. Allocation of this site is unjustified.

Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: In my consideration it is not sound due to a direct contradiction with The Environment Act 2021, within which there is a stated commitment to conserve and enhance the habitat and wildlife of our natural environment, Natural habitats and biodiversity; flora and fauna, and to Ensure current, and potential future, habitat connectivity is not compromised.

Allocation of Exmo_20, a supporting habitat for foraging Nightjars would be contrary to this.

Furthermore Exmo_20 is located on the SNA 368 which is being allocated as a site with the Devon Local Nature Recovery Network (LNRS) as required by the Environment Act 2021, so allocation would be in conflict with this strategy of conserving and enhancing the habitat and wildlife of our natural environment.

Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 for housing allocation should be selected, as Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI /SAC /SPA /NNR) due to Exmo_20 being a supporting foraging habitat.

Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Continuity and Accountability

Full name: Shane Rabik

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Contrary to POLICY OLO5 of the local plan, this project would lead to coalescence of Budleigh Salterton and Exmouth.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: For the sake of continuity and accountability

Full name: Su Randell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmouth-20 is significantly closer to Budleigh than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh, shops, school, doctors etc would be the preferred choice for residents of Exmouth-20. This undermines the settlement hierarchy and would lead to coaxes of Budleigh and Exmouth contrary to POLICY OLO5 of the Local Plan. An alternative site for Exmouth-20 should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo-20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmouth-20 being a supporting foraging habitat. Developing Exmo-20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo-20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade 11* listed church and churchyard, drastically altering the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HEO2. Exmo-20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the “tranquility, wildness and dark skies “ of the countryside, which is contrary to POLICY OLO1 Exmo-20 development would be in conflict with the strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.9 Exmo-20 is in conflict with POLICY OLO9 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed HeathsSAC/SPA) such that the plan fails the integrity test Development of Exmo-20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth which is already beyond its design capacity. This is in conflict with POLICY ARO1B Exmo-20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to

PARAGRAPH 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the local plan Do not access the site via the B3179 or Southern Wood.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: elaine raymond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to EXMO_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. EXMO_20 would cause harm to the adjacent Pebblebed Heath (SSSI/SAC/SPA/NNR) due to EXMO_20 being a supporting foraging habitat. Developing EXMO_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Z Reece

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Exmo_20 would destroy the tranquility, wilderness and dark skies of the countryside a n area of outstanding natural beauty.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I

object as this will have a detrimental effect increase use of car travel and congestion. It is an unsustainable development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The NPPF (188) states that “Plans must distinguish between the hierarchy of international, national and locally designated sites”. The Pebblebed Heaths are amongst the most important conservation sites in Europe. European sites have the benefit of the highest level of legislative protection for biodiversity, and there are also specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, that all public bodies are required to adhere. The Pebblebed Heaths are amongst the most important conservation sites in Europe, classified as a Special Protection Area for the UK population of breeding nightjar and Dartford Warbler, and Exmo_20 is functionally linked land; a supporting habitat for the foraging nightjar. Studies show that these fly from nesting sites to feed at night, and loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Allocation of Exmo_20 is in conflict with the NPPF (188), Local Plan policy PB01 and paragraph 13.23.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is complete conflict to The Local Plan policy OL01 which states that development will only be permitted where...it will protect and enhance valued landscape attributes and special features and qualities, including aesthetic and perceptual factors such as tranquility, wildness and dark skies. Adjacent to the Pebblebed Heaths(SPA/SAC/SSSI) the dark skies, wildness and tranquility are not only aesthetic and perceptual factors but vital conditions for the wildlife on the Heaths for which Exmo_20 provides a supporting habitat. Allocation of Exmo-20 would have a detrimental effect on this habitat which is a Strategic Nature Area, (SNA368) part of the on Devon Local Nature Recovery Network, and provides a wildlife corridor and stepping stone for wildlife on the double designated Pebblebed Heaths. The dark skies and tranquility are a valued landscape attribute of Exmo_20, both perceptually and functionally and would be destroyed by allocation of the site.

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Local Plan states that “primary vehicle access to the site, serving the large majority/bulk of development will be from the B3179 to the north”, meaning that the vehicular access point to Exmo_20 is closer to Budleigh Salterton (2.3 miles and Woodbury (3.4 miles) than it is to Exmouth(4 miles). From this point it is both closer and faster to drive to the town centre in Budleigh than to the town centre in Exmouth which would result in residents relying primarily on Budleigh for key infrastructure and services (high street/GP/primary school etc). Budleigh is a tier 2 town and could not support this. Policy OL05 of The Local Plan states that development would not be permitted if it could lead to coalescence. Allocation of Exmo_20 would lead to functional coalescence of Exmouth and Budleigh Salterton. Paragraph 3.34 of The Local Plan states that by directing growth to the tier 1-4 settlements their approach ensures development is concentrated in areas with existing infrastructure and services. Allocation of Exmo_20 is contrary to this; despite being labelled as an Exmouth site the reality is that the increase in population (expected 2000+) will be supported by Budleigh, a tier 3 settlement. Exmouth Community College is the catchment secondary school for both Exmouth and Budleigh and does not have capacity for a large increase in population, nor the physical space to enlarge and expand. Numerous children from Exmouth have been unable to secure a place there due to insufficient capacity and have had to travel to Cranbrook for secondary education. Existing sewerage systems in both Budleigh and Exmouth are wholly inadequate for the current population. The Local Plan is unsound; allocation of Exmo_20 is contrary to Policy OL05 and paragraph 3.34 of the Local Plan, contrary to NPPF 129c in failing to consider existing infrastructure problems and would result in a significant increase in “the unrestricted sprawl of large built-up areas”, something the NPPF specifies should be avoided (NPPF 143 a,b and c).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo-20 conflicts with NPPF 77 which outlines how large numbers of homes can best be achieved through new settlements or significant extensions to existing villages and towns which should be well located, supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Exmo_20 is neither a new settlement nor an extension to an existing town, it would be an isolated housing development. The NPPF then clarifies that “when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre” (NPPF 92). Exmo_20 is inaccessible and poorly connected to the town centre; Exmouth is a minimum of 4 miles by car from the proposed housing (and necessitates a circuitous car journey), up a steep hill and without cycle paths. It would be a development detached from the town without feasible connection to Exmouth. As such allocation of Exmo_20 is unsound and it should be removed from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 conflicts entirely with both the Local Plan and the NPPF. It is significant development in a location which would increase the need to travel, cannot offer a genuine choice of sustainable travel modes and would significantly increase congestion and emissions - all contrary to both chapter 9 of the NPPF and Chapter 11 of The Local Plan. Walking and cycling are not viable choices - the centre of the site is over an hour's walk at brisk pace to access the town centre/sports centre/train station/secondary school etc. and the topography makes walking as a primary choice unrealistic. Studies referenced in the Local Plan (HCO-002, evidence library) show that people are most likely to walk if their journey is not further than 10 minutes walk each way, beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Walking from is not a sustainable travel mode from Exmo_20. Both proposed access points lead to busy roads without any cycle paths so although cycle paths can be provided within the development cycling is not a safe or viable option to access anywhere outside of the site. Cycling is not a sustainable travel mode from Exmo_20. Travel from Exmo_20 would be by private car, yet the main (if not only) vehicular access to the site is proposed at the B3179, 4 miles away from Exmouth town centre - and the most distant point to the town from the whole site of Exmo_20. Furthermore due to the legal requirement that no residential dwellings can be built within a minimum distance of 400m from East Devon Pebblebed Heaths (SPA/SAC/SSSI), residents would be forced to drive between 0.4km and 0.8km in the opposite direction to Exmouth from their home just to reach the site entrance, resulting in not only more car journeys but also requiring cars to travel more miles, thus increasing both congestion and emissions. This lack of sustainable transport increases social exclusion for those without car access, such as young people, older people, those with disabilities, and low income households (Local Plan paragraph 11.3). The Local Plan also proposes that it is feasible for larger developments to be within 800m of key services and facilities yet the majority of site Exmo_20, one of the largest proposed

developments, will not be within 800m of any key services or facilities. Allocation of Exmo_20 is in conflict with policies TR01, TR03, paragraphs 11.2, 11.3, 11.4, 11.6 and figure 7 of the Local plan, therefore allocation of Exmo_20 is unsound

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Billy Reed

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 conflicts entirely with both the Local Plan and the NPPF. It is significant development in a location which would increase the need to travel, cannot offer a genuine choice of sustainable travel modes and would significantly increase congestion and emissions - all contrary to both chapter 9 of the NPPF and Chapter 11 of The Local Plan. Walking and cycling are not viable choices - the centre of the site is over an hour's walk at brisk pace to access the town centre/sports centre/train station/secondary school etc. and the topography makes walking as a primary choice unrealistic. Studies referenced in the Local Plan (HCO-OO2, evidence library) show that people are most likely to walk if their journey is not further than 10 minutes walk each way, beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Walking from is not a sustainable travel mode from Exmo_20. Both proposed access points lead to busy roads without any cycle paths so although cycle paths can be provided within the development cycling is not a safe or viable option to access anywhere outside of the site. Cycling is not a sustainable travel mode from Exmo_20. Travel from Exmo_20 would be by private car, yet the main (if not only) vehicular access to the site is proposed at the B3179, 4 miles away from Exmouth town centre - and the most distant point to the town from the whole site of Exmo_20. Furthermore due to the legal requirement that no residential dwellings can be built within a minimum distance of 400m from East Devon Pebblebed Heaths (SPA/SAC/SSSI), residents would be forced to drive between 0.4km and 0.8km in the opposite direction to Exmouth from their home just to reach the site entrance, resulting in not only more car journeys but also requiring cars to travel more miles, thus increasing both congestion and emissions. This lack of sustainable transport increases social exclusion for those without car access, such as young people, older people, those with disabilities, and low income households (Local Plan paragraph 11.3). The Local Plan also proposes that it is feasible for larger developments to be within 800m of key services and facilities yet the majority of site Exmo_20, one of the largest proposed

developments, will not be within 800m of any key services or facilities. Allocation of Exmo_20 is in conflict with policies TR01, TR03, paragraphs 11.2, 11.3, 11.4, 11.6 and figure 7 of the Local plan, therefore allocation of Exmo_20 is unsound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan, or reduce it dramatically and revert to allocating 150 homes at Exmo_20b.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Cora Reece

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the 'tranquility, wildness and dark skies' of the countryside which is contrary to policy OL01.

Exmo_20 development is detrimental to the mental health and wellbeing of the public at large as well as local residents who benefit from wide open spaces and wildlife in this area.

The proposal is in conflict with local habitats and wildlife contrary to policy OL09 and PB04.

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient accessible town. This would lead to coalescence of Budleigh and Exmouth contrary to policy OL05 and TR01.

The proposed development of Exmo_20 signals a permanent loss of agricultural land and food production for swathes of countryside in the local and immediate area. This appears to be in disregard to the other issues already outlined as above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a local resident I have concerns about the changes to the immediate area of where I live and the impact/ affect this will have on my lifestyle.

Full name: Sally Regan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Full name: Robert Richards

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heath (SAC/SPA). Developing Exmo-20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. EXMO-20 would destroy the "tranquility,wildness and dark skies" of the countryside, which is contrary to POLICY 0L01. Developing EXMO-20 would fragment and isolate habitats and destroy wildlife corridors,contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to....air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo-20 is in conflict with POLICY PB04. Exmo-20 would have significant adverse effects on St. John in the Wilderness Grade 11 listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. Exmo-20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY ARO1B. Exmo-20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6 It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point to Exmo-20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, school, beach etc) would be the obvious choice for residents of

Exmo-20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY 0L05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Pauline Ann Richards

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

The proposed site should not be accessed via the increasingly busy B3179. This road is narrow and already large lorries using this road are unable to stay on their side of the white lines, frequently causing difficulties to oncoming traffic.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Courtney Richards

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Remove Exmo_20 from the local plan
2. The proposed site should not be accessed from the B3179. This road is not very wide and large vehicles already drive out over the white line. Any increase in traffic will add to this already dangerous piece of road

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Courtney Richards

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This development would cause harm to the Pebblebed Heaths and Exmo_20 is contrary to Policy PB01 of the Local Plan. Areas at the bottom of the site are at risk of flooding. This development will increase the likelihood of flooding in areas lower than the proposed site contrary to Policy AR01B. Budleigh Salterton could not cope (doctors, schools etc) with the great influx of people given the proposed access site is closer to Budleigh Salterton than Exmouth

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The proposed site should not be accessed via the B3179. This road is narrow and already large lorries using this road are unable to stay on their side of the white lines, frequently causing difficulties to oncoming traffic.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: A Rider

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Trevor Roach

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: David Roberts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Drs, school, beach et cetera) would be the preferred choice for residents of EXMO20. The infrastructure of Budleigh (High Street, doctors, school, beach etc.) This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo 20 housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo 20 would cause harm to the adjacent pebble bed heaths (SSS1/SAC/SPA/NNR) due to Exmo 20 being a supporting foraging habitat. Allocating Exmo 20 is contrary to the HELAA, the site selection methodology and Policy PB01 of the local plan and not in accordance with the mitigation hierarchy to select avoidance over mitigation.

Exmo 20 would cause harm to the heritage assets as this Saxon Norman Medieval settlement most significantly St John in the wilderness grade 11 listed church, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to policy HE02.

Exmo 20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the tranquility, wildness and dark skies, which is contrary to policy OL01. Exmo 20 development would be in conflict with the strategic nature area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to paragraph 13.23 of the local plan. It would cause

harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9. Exmo 20 is in conflict with policy 0L09 and policy PB04 as the habitats regulations assessment 30th of January 25 states that there is currently not sufficient certainty to rule out adverse affects in integrity in relation to air quality (East Devon pebblebed Heaths SAC/SPA such that the plan fails the integrity test. The main site access proposed is opposite the SAC/ SPA.

Development of Exmo 20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with policy AR01B.

Exmo20 would increase the need for car travel, contrary to figure 7 – the energy hierarchy and increase traffic congestion, in conflict with paragraph 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800 m to existing key services and facilities, contrary to paragraph 11.6. it is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to Policy TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Callum Roberts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into account

Full name: Donna Roberts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 for the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into account

Full name: Ian Roberts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure my objections are heard

Full name: Justin Robertson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Ben Robinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Nicole Robinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (high street, doctors, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jayne Robinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

* ??The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * ??Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * ??Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. * ??The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * ??Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too

far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * ??The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Full name: Jeremy Robinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo 20 is in conflict with SP01. Exmouth (a Tier 1 town) is totally unsuitable for further growth, The centre of the town is wedged in by the coast and River Exe to the South and West and the sprawl of the town already to the North and East is running up to the escarpment formed by Woodbury Common (the Pebblebed Heaths) and closing in on neighbouring towns and villages, Any development here will be too far from the significant infrastructure of Exmouth and unsustainable!

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: No modification will make it legally compliant

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Totally unsuitable location, Transport of choice for residents of housing in the Southern area of the site seeking access to the Centre of Exmouth will have to drive a significant further distance in order to Exit to the East onto B3179 - the identified exit from the development (excluding the strip of 400m mandatory buffer zone). This will necessitate substantial further "car miles". Walking will be necessary to access even improved bus services and the topography will militate against cycle access.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There are none

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmouth is already deficient in infrastructure for its existing population. There is a need for additional Doctors surgeries and, particularly, dentists. The existing sewerage system is already demonstrably inadequate (Discharges into the Sea, beach closed for swimming regularly and regular features on National news outlets

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Neill Robson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Karen Robson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Jodie Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. We have first hand experience of this. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need to travel by car and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too hilly) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce Exmo_20 from local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Andrea Gay Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Revert to Exmo _20b as previously proposed,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure transparency and correct procedures.

Full name: Andrea Gay Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heath (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging lhabitat. Allocating Exmo_20 is contrary to the HELAA,the Site Selection Methodoligy & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would destroy the “the tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the LOCAL PLAN. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified downstream flood risk along Withycombe

Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach, etc.) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

Exmo_20 would have significant adverse effects on St. John In The Wilderness Grade II listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02..

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: * Remove Exmo_20 from the Local Plan. * Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure transparency.

Full name: Andrea Gay Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Joe Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Nicholas Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This site would cause harm to the Pebblebed Heathlands (SAC/SPA). Developing this site is contrary to POLICY PBO1 of the local plan and with the mitigation strategy. Exmo_20 would be very detrimental to the 'tranquillity, wildness and darkness of night skies' of the countryside which is contrary to POLICY OLO1. Developing this site (Exmo_20) would break up and isolate wildlife habitats and destroy corridors, all of which are contrary to PARAGRAPH 13.9 of the local plan. It would harm irreplaceable habitats, ancient trees and hedgerows which act as natural corridors for wildlife and which are rich in a variety of species, contrary to PARAGRAPH 13.9. The habitat regulations assessment (30.01.25) confirms that there is 'currently not sufficient certainty to rule out adverse effects in integrity to.....air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OLO9 and POLICY PBO4. Development of Exmo_20 would have a detrimental effect on St. Johns In The Wilderness Grade II listed church and churchyard, and spoiling the peaceful setting for worship, contrary to POLICY HE02. Exmo_20 would increase the water run-off through the natural stream and from a heavy clay soil, increasing the flood risk of the already identified in Withycombe contrary to POLICY AR01B. The proposed site of Exmo_20 would increase vehicle travel beyond the 800m to key services and facilities, contrary to POLICY TR01. The main access point to Exmo_20 is closer to Budleigh Salterton than to Exmouth. The services and infrastructure of Budleigh Salterton would put under a greater strain than unfair strain that has not been properly considered. This would be contrary to POLICY OL05 of the LOCAL PLAN as it would lead to a blending together of the two discrete towns.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan, or at the very least reduce its scale. Do not have vehicle access via the B3179. Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a stakeholder I am anxious to see the democratic system, with all its transparency, in action.

Full name: Andrea Gay Rorke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo 20 is against paragraph 11.6 because it is further than 800 metres from any services and facilities making it unsuitable for people to walk.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Only build on the very southern section of the site (20_b, or remove the allocation of this site as it is in conflict with the paragraph 11.6.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure a transparent and correct adherence to the stated policies.

Full name: Anne Rose

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to register my objection to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. The old railway line is a well used cycle and footpath that enables Exmouth and Budleigh residents to exercise in a rural environment. We have also noted a number of disabled people using the path with their mobility scooters.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

We hope you will reconsider these building plans.

Full name: Michael Rosser

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase traffic congestion conflicting with paragraph 11.2. People would need to travel more than 800 metres to existing services contrary to paragraph 11.6.. It would conflict with the Strategic Nature Area 368 - contrary to paragraph 13.23 of the local plan. It would cause harm to wildlife biodiversity , trees and hedgerows, contrary to paragraph 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Daphne Rowe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20: Although the plan mentions Exmouth, this new development is much nearer to Budleigh Salterton. I am completely against this large amount of houses producing more than 1,400 people plus many cars - possibly two per household - and of course many children. There is one school in Budleigh - full. One Doctor's surgery and it incredibly hard to get an appointment at the best of times, let alone if there are many extra people. The B3179 road is narrow, winding and as are other roads in the area, and not suitable for extra traffic. Parking in Budleigh is hard to find and there are not many buses. I spoke to some shop owners who are not keen on the proposals and say it won't make much difference to their businesses. So many people shop on line, go to Tesco and Lidl and don't use local shops at all. I want to know how many 'affordable' houses are in the proposal - we need cheaper houses and not just the expensive properties. There is already a large housing area at Goodmores Farm on the edge of Exmouth, leading onto small roads. What about infrastructure??

Full name: Peter Rowntree

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The scale of the development is disproportionate to the countryside setting. It will have a significantly detrimental impact on wildlife & the countryside, especially the aspect of wildlife corridors & movement. Increased car usage because of the isolated location, again detrimental to wildlife (& humans). Budleigh Salterton has insufficient capacity of key services to accommodate such a large development & it will merge Exmouth into Budleigh Salterton to the detriment of both towns & their residents. Policies OL01, OL05, & paragraphs 11.2, 11.6 & 13.23.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20b would seem to be far more suitable, if developments are mandatory?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Rowsel

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To remove Exmo20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: so we get to air our views

Full name: Jacqueline Jane Ruhlig

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Main access point of Exmo _20 significantly closer to Budleigh than Exmouth, making Budleigh its most convenient and accessible town. Services & infrastructure of Budleigh would be the preferred choice for residents of Exmo_20. Would lead to the merging together of Budleigh & Exmouth, contrary to Policy OLO5 of the local plan. Exmo _20 would cause harm to the heritage assets, most significantly St John in the Wilnernesss Grade 11 listed church & churchyard, drastically changing the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. EXMO-20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OLO1.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce size of EXMO-20 or REMOVE it from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lin Salter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. This shared path is a wonderful amenity and was originally constructed as Councils had to provide cycle paths, but now you don't care about it or its users.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Mr and Mrs Satterly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors, contrary to paragraph 13.23 of the Local Plan. As well as causing harm to irreplaceable habitats, veteran trees and species rich hedgerows contrary to paragraph 13.9.

The heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth (already under pressure from climate change) which conflicts with policy AR01B.

In addition, the Exmo_20 development would increase the need for car travel, contrary to Figure 7 and conflict with paragraph 11.2 The isolated location would mean residents would need to travel much further than 800m to existing key services and facilities which is contrary to paragraph 11.6. The location is also too far and too steep from any town centre to use walking or cycling as a main choice of transport for most people which is contrary to policy TR01.

I also believe that with the almost 200 houses currently being built up the road from this proposed site (Exmo_20) at the new Goodmores development, Exmouth does not have the jobs, dentists, GPs or school spaces to support an additional 700 households. Buses and trains to Exeter are frequently delayed or full and the roads are busy and not well maintained (potholes) due to the constant use. Add to this the additional pressures from students visiting from the language schools and Sandy Bay from spring - summer, that is a lot of people in a town that is already buckling under inadequate sewage infrastructure with regular raw sewage leaks and problems with drainage.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To remove the Exmo_20 site from the Local Plan altogether. Alternatively, reducing the size of Exmo_20 and removing the access to the site via Southern Wood would reduce some of the issues above, but not solve them.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sandra C Satterly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: the main access point of Exmo_20 is significantly closer to Budleigh Salterton than it is to Exmouth thus making Budleigh Salterton the most convenient and accessible town. The services and infrastructure of Budleigh Salterton (the High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh salter ton & Exmouth, contrary to POLICY OL05 of the local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebeds Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in Integrity in relation to ...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via Southern Wood.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Nigel Savery

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 and its development is contrary to * Policy PB01 and is not in accordance with the mitigation strategy. Exmo_20 should be located on an alternative site so there is less harm to the pebbled heaths. Exmo_20 would harm the wilderness, dark skies and peacefulness of the area which is contrary to *Policy OL01. EXmo_20 would destroy wildlife habitats and their corridors contrary to Paragraph 13.23. it would kill habitats, trees, heather rows never to be seen or replaced again so is contrary to *Paragraph 13.9. *The habitats regulations assessment of 30.01.25 confirms that there is currently not sufficient certainty to *RULE OUT adverse effects in integrity in relation to the air quality regarding the Devon pebbled heath *SAC/SPA. Exmo_20 and it is in conflict with Policy OL09 and *Policy PB04. EXmo_20 would have adverse effect on Grade 11 listed St John's church which is a peaceful place of worship and its setting this is contrary to *Policy HE02. Exmo_20 is a catchment area of rainwater for Exmouth and most of the Withycombe brook. Exmo_20 would be built on heavy claymaking soakaways ineffective therefore allowing water to flow and possibly flood which is in conflict with *Policy AR01B. Exmo_20 would cause more traffic in an already congested area with bad road access to Exmouth and Budleigh, Access to the site will not work and would need rethinking. to suggest people will ride or walk into town is a joke, people use cars. contrary to *Policy TR01. Not enough Shops, need a large supermarket to rival Tesco. not enough Doctors, Schools the area would be over run, which is contrary to *Policy OL05.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Anthony Sayers

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Main access point much closer to Budleigh than Exmouth. This would lead to coalescence of Budleigh and Exmouth contrary to Policy OL05 of the LP. EXMO-20 would cause harm to nearby heritage sites contrary to Policy HE02. A detrimental effect on the open countryside contrary to policy OL01. EXMO-20 would increase traffic congestion, contrary to policy TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO-20 from the local plan. Do not access site from the already very busy B3179. Revert to EXMO-20b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: rachel Scott

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: to ensure our objections are taken into account

Full name: Peter William Scott

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan will have a detrimental impact on the quality of life of those like myself living in Budleigh Salterton.

Full name: Michelle Seabrook

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The local area is already struggling with parking. Amenities are also already under extremem pressure, the water company, hospital just to name a few. Exmo_20 would cause harm to the heritage assetts at the medieval settlement, most significantly the st john in the wilderness grade 2 listed church and the rural setting for worship and burials which currently exists, this is contrary to policy HE02

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

Do not access via southern wood

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a local resident i would like to be included in future plans for the area

Full name: James Seabrook

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade I1* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan., It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo 20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to..air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY ARO1B

Exmo_20 would increase the need for car travel, contrary to Figure 7- the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: While I recognise the continual need for more homes, there is nothing I find suitable about the exmo_20 area. Such an enormous development is wholly unsuitable for the environment and the surrounding infrastructure. Suggestions for a road connection through Southern Wood are laughable - clearly no-one has looked at the state of Meadow View Road's parking in

recent years. The road could not possibly cope with becoming a shortcut for an estate that size.

Exmo_20 should be removed from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Amanda Seymour

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: amelia sgroi

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development should be located in another place where it will not cause harm to the Pebblebed Heaths.

Exmo_20 will destroy the 'tranquility, wildness and dark skies' of the countryside. It would fragment and isolate habitats and destroy wildlife corridors. It would be detrimental to irreplaceable habitats. All contrary to policies OL01, OL09, PB04

I will increase the need for car travel and increase congestion. It is very isolated so people will need to drive to leave and enter the site. It is too far and too steep for people to use walking and cycling as their choice of transport. Contrary to policy TR01

The main access point is closer to Budleigh than it is to Exmouth, making Budleigh the most accessible town, but without the services and infrastructure to support this influx in the Dr's, pharmacy, school etc. Contrary to policy OL05

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lara Shaddick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (Doctors/dentists, schools, high street, beach etc) would be the preferred choice for new residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. In addition, the sewage and waste water systems are already failing to cope, this development would make an already unacceptable situation worse

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rebecca Shand

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I

don't normally get involved with building plans as I understand that folks need somewhere to live - but this too much, too big and impractical.

I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Please consider the impact this would have on land that is historically and environmentally important and reject this application. Not on your watch, as they say.

Full name: Deb Shatford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The services and infrastructure of Budleigh Salterton are insufficient to cope with this development. Budleigh being closer to the access point than Exmouth. The plan would cause significant harm to the pebblebed heaths against the SSS, SAC, SPA & NNR as its a significant foraging habitat, contrary to Policy PB01. It would cause harm to irreplaceable habitats, trees and hedgerows. Car travel and congestion would be increased, and the B3179 often has accidents as road entrances are on bends and difficult to access.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Fiona Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach

etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sara Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth. The Services and infrastructure of Budleigh (High Street, GP Surgery, School and the Beach) would be compromised. This contravenes Policy OL05 of the local plan.

Exmo_20 development contravenes Policy PB01.

Exmo_20 would cause harm to the heritage assets including St John In the Wilderness Grade II listed Church and Churchyards. This is contrary to Policy HE02.

Exmo_20 would have a detrimental effect on designated wildlife sites. Contrary to Policy OL01.

Exmo_20 development would be in direct conflict with the Strategic Nature Area 368.

Exmo_20 would be in direct conflict with Policy OL09, and PB04.

Exmo_20 Development on heavy subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk. Conflict with Policy AR01B.

Exmo_20 would increase the need for car travel, increasing traffic congestion. The isolation of the Development would mean people travelling much further to access key services. It is too far and steep from any Town to be cycled or walked. Contrary to Policy TR01.

Remove Exmo_20 from The Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from The Local Plan.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Claire Rodway confirmed by email that in accordance with the Site Selection Methodology May 2022 in response to the question: “If a site fails the HELAA site sifting test, being deemed available but not suitable or achievable, can it then be considered for allocation in the Local Plan?” She replied: “No it wouldn’t be considered for allocation because it would have been sifted out earlier in the process so wouldn’t have progressed to site assessment stage, in accordance with the methodology.”

This is applicable to Exmo_20, therefore it’s allocation is not sound.

Email chain attached & SSM May22

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of Exmo_20 from the Local Plan, consider other site which did passed the HELAA stage.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure the inspector is referring to the May 22 site selection methodology

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20, a supporting habitat for foraging Nightjars would be contrary to this, furthermore Exmo_20 is located on the SNA 368 which is being allocated as a site with the Devon Local Nature Recovery Network (LNRS) as required by the Environment Act 2021, so allocation would be in conflict with this strategy of conserving and enhancing the habitat and wildlife of our natural environment. This is unjustified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Other sites, not falling within Nature Recovery Network areas, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: East Devon seem to be completely unaware of this conflict in proposed land use for this high biodiversity and supporting habitat site.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Withycombe Brook, which has significant identified flood risk in Exmouth and has not been assessed in the Strategic Flood Risk Assessment of this draft Local Plan [EDDC Level 1 Strategic Flood Risk Assessment – Final Report February 2024 p.69 states “This table does not provide information on all Main Rivers in East Devon. Other Main Rivers within East Devon are: Grindle Brook, Wotton Brook, Withycombe Brook, Budleigh Brook, Back Brook, Snod Brook, The Gissage and Woodhayne Range.”]. Considering the existing conditions, that the Brook runs through the centre of the largest settlement in East Devon, and the substantial size of the proposed Exmo_20 allocation upstream, this is unjustified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Undertake a Flood Risk Assessment for Withycombe Brook, or remove all sites within its upstream catchment area and select alternative sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To provide local knowledge on the drainage issues.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The procedure for approving the site selections and the draft regulation 19 draft Local Plan relies on the Strategic Planning Committee (SPC) performing in accordance with the councillor Code of conduct and Code of practice for councillors and officers dealing with planning matters. There have been multiple occasions where proceeding appears to have not been in accordance with protocol. Firstly Councillor Ben Ingham's behaviour on 3rd September 2024 and 29th October 2024 is currently under investigation for breaches of the Code of conduct. It has been acknowledge by the EDDC monitoring officer that he breached the Code of practice on 3rd September 2024 by speaking regarding Lymp_07, then taking part in debate, then voting, then not ensuring his actions were recorded suitably. Of note is the complete omission of him speaking to the committee from the meeting's minutes. The significance of these episodes is that the Councillor's conduct potentially influence the Lymp_07 vote and due to the sequential way the site allocations were considered, had implications for all subsequent decisions, as mentioned by the Chair, Councillor Todd Olive, immediately after the Lymp_07 vote, stating, "and we now have 100 more houses to find". The decision making process is potentially not sound and not lawful.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site selection process for all SD01 site allocations needs to be rerun

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The procedure for approving the site selections and the draft regulation 19 draft Local Plan relies on the Strategic Planning Committee (SPC) performing in accordance with the councillor Code of conduct and Code of practice for councillors and officers dealing with planning matters. There have been multiple occasions where proceeding appears to have not been in accordance with protocol. Firstly Councillor Ben Ingham's behaviour on 3rd September 2024 and 29th October 2024 is currently under investigation for breaches of the Code of conduct. It has been acknowledged by the EDDC monitoring officer that he breached the Code of practice on 3rd September 2024 by speaking regarding Lymp_07, then taking part in debate, then voting, then not ensuring his actions were recorded suitably. Of note is the complete omission of him speaking to the committee from the meeting's minutes. The significance of these episodes is that the Councillor's conduct potentially influence the Lymp_07 vote and due to the sequential way the site allocations were considered, had implications for all subsequent decisions, as mentioned by the Chair, Councillor Todd Olive, immediately after the Lymp_07 vote, stating, "and we now have 100 more houses to find". The decision making process is potentially not sound and not lawful.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site selection process for all SD01 site allocations needs to be rerun

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be able to make representation in any debate.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Exmo_20 site is located adjacent to the Pebblebeds Heath, designated as the most significant wildlife site in the south-west, being the only double internationally designated SAC & SPA land based site, and also being a SSSI, NNR and part of the National Landscape. The maps used for the site selection process [attached] include multiple designations from national, county level and local authority level, but omit these SAC & SPA international designations. The LPA must provide all the relevant information so that informed decision can be made. With the above in mind, it is clear that decision makers, such as the Strategic Planning Committee could have been misinformed, relying on incorrect information to form opinions, such that their judgement was unjustified and therefore not sound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 and select alternative sites that will not have a likely significant effect on the Pebblebeds Heath SAC / SPA and will not required significant mitigation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am concerned regarding EDDC's cavalier attitude

towards development adjacent to the Pebblebeds Heath and their ability to undertake their duty as the "competent authority" under the Habitats Regulations.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Resubmitting due to ongoing issues with commonplace: The Regulation 19 Draft Local plan voted for on 11th December 2024 had no Habitats Regulations Assessment (HRA). This is the plan that was used for the Regulation 19 process, please note that minor amendments were made subsequently and agreed on 3rd February 2025, but the vote on that day was strictly for the amendments, not the Regulation 19 Draft Local plan agreed on 11th December 2024. The HRA was published by Footprint Ecology on 30th January 2025. This HRA stated that the draft Local Plan had an inherent conflict. This needed to be address for the plan not only to be deemed sound but also legally compliant. Clearly as the LPA had agreed to proceed with the Regulation 19 Draft Local plan on 11th December 2024, there was no option to address this, in fact the entire Regulation 19 Draft Local was not informed by the HRA, rather that the LPA expected the HRA to support the Plan, as Matt Dickins states in his email dated 4th December 2024 [Dickins email attached] “We will be having an assessment under the Habitat Regulations produced for us in support of the plan”. Throughout the Local Plan preparation process, EDDC, as the ‘competent authority’ have demonstrated a widespread cavalier attitude, or a fundamental misunderstanding, regarding their obligations under the Conservation of Habitats and Species Regulations. The HRA should have informed the decision making and must not show conflict prior to progressing to Regulation 19 publication. By producing the HRA after agreeing the Regulation 19 Draft Local plan, the LPA have possibly erred in law. The NPPF states “Significant adverse impacts on these [environmental] objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.” Which is part of the Mitigation Hierarchy, which does not appear to have been applied to the site selection process. I was concerned of the lack of consultation with Natural England regarding the allocation of Exmo_20, as until the 3rd September 2024 it was not proposed to be allocated (and owing to the fact it failed the HELAA assessment, in accordance with the Site Selection Methodology May 2022,

could never be). A freedom of information request was made to Natural England, who confirmed that they had at no point been consulted regarding Exmo_20 being allocated [attached FOI NE] therefore EDDC have failed with their Duty to Co-operate obligation. Please note that this observation is for one site with one statutory body, so it is possible that non compliance with Section 33A of the PCPA 2004 and Section 18 of the The Town and Country Planning (Local Planning) (England) Regulations 2012 is applicable to multiple site allocations and multiple statutory bodies. On 4th February, despite the HRA published on 30th January stating under 9.9 “there is inherent conflict in that the growth proposed in the Plan would exceed threshold levels and there is, as yet, no means to mitigate or address the risks.”, Ed Freeman advised the SPC councillors that “we are satisfied it can be mitigated”, based on conversations he has had. After the meeting I emailed Ed Freeman to ask for evidence to back up the assertion he gave to the SPC, but he replied stating “I do not intend to respond to these messages or future messages on these matters” [Freeman emails attached]. I feel the SPC were misled by Ed Freeman assertion upon which he has provided no foundation or evidence to substantiate his claim. Furthermore, having a Plan in conflict with the HRA makes it not sound and not lawful and the Plan should not have progressed to Regulation 19 publication stage. The Procedure Guide for Local Plan Examinations states: Section 1. The LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. Procedure Guide for Local Plan Examinations - GOV.UK

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and select sites giving consideration to the mitigation hierarchy.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Resubmitting due to ongoing issues with commonplace: The Regulation 19 Draft Local

plan voted for on 11th December 2024 had no Habitats Regulations Assessment (HRA). This is the plan that was used for the Regulation 19 process, please note that minor amendments were made subsequently and agreed on 3rd February 2025, but the vote on that day was strictly for the amendments, not the Regulation 19 Draft Local plan agreed on 11th December 2024. The HRA was published by Footprint Ecology on 30th January 2025. This HRA stated that the draft Local Plan had an inherent conflict. This needed to be address for the plan not only to be deemed sound but also legally compliant. Clearly as the LPA had agreed to proceed with the Regulation 19 Draft Local plan on 11th December 2024, there was no option to address this, in fact the entire Regulation 19 Draft Local was not informed by the HRA, rather that the LPA expected the HRA to support the Plan, as Matt Dickins states in his email dated 4th December 2024 [Dickins email attached] “We will be having an assessment under the Habitat Regulations produced for us in support of the plan”. Throughout the Local Plan preparation process, EDDC, as the ‘competent authority’ have demonstrated a widespread cavalier attitude, or a fundamental misunderstanding, regarding their obligations under the Conservation of Habitats and Species Regulations. The HRA should have informed the decision making and must not show conflict prior to progressing to Regulation 19 publication. By producing the HRA after agreeing the Regulation 19 Draft Local plan, the LPA have possibly erred in law. The NPPF states “Significant adverse impacts on these [environmental] objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.” Which is part of the Mitigation Hierarchy, which does not appear to have been applied to the site selection process. I was concerned of the lack of consultation with Natural England regarding the allocation of Exmo_20, as until the 3rd September 2024 it was not proposed to be allocated (and owing to the fact it failed the HELAA assessment, in accordance with the Site Selection Methodology May 2022, could never be). A freedom of information request was made to Natural England, who confirmed that they had at no point been consulted regarding Exmo_20 being allocated [attached FOI NE] therefore EDDC have failed with their Duty to Co-operate obligation. Please note that this observation is for one site with one statutory body, so it is possible that non compliance with Section 33A of the PCPA 2004 and Section 18 of the The Town and Country Planning (Local Planning) (England) Regulations 2012 is applicable to multiple site allocations and multiple statutory bodies. On 4th February, despite the HRA published on 30th January stating under 9.9 “there is inherent conflict in that the growth proposed in the Plan would exceed threshold levels and there is, as yet, no means to mitigate or address the risks.”, Ed Freeman advised the SPC councillors that “we are satisfied it can be mitigated”, based on conversations he has had. After the meeting I emailed Ed Freeman to ask for evidence to back up the assertion he gave to the SPC, but he replied stating “I do not intend to respond to these messages or future messages on these matters” [Freeman emails attached]. I feel the SPC were misled by Ed Freeman assertion upon which he has provided no foundation or evidence to

substantiate his claim. Furthermore, having a Plan in conflict with the HRA makes it not sound and not lawful and the Plan should not have progressed to Regulation 19 publication stage. The Procedure Guide for Local Plan Examinations states: Section 1. The LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. Procedure Guide for Local Plan Examinations - GOV.UK

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and select sites giving consideration to the mitigation hierarchy.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Resubmitting due to ongoing issues with commonplace: The Regulation 19 Draft Local plan voted for on 11th December 2024 had no Habitats Regulations Assessment (HRA). This is the plan that was used for the Regulation 19 process, please note that minor amendments were made subsequently and agreed on 3rd February 2025, but the vote on that day was strictly for the amendments, not the Regulation 19 Draft Local plan agreed on 11th December 2024. The HRA was published by Footprint Ecology on 30th January 2025. This HRA stated that the draft Local Plan had an inherent conflict. This needed to be address for the plan not only to be deemed sound but also legally compliant. Clearly as the LPA had agreed to proceed with the Regulation 19 Draft Local plan on 11th December 2024, there was no option to address this, in fact the entire Regulation 19 Draft Local was not informed by the HRA, rather that the LPA expected the HRA to support the Plan, as Matt Dickins states in his email dated 4th December 2024 [Dickins email attached] “We will be having an assessment under the Habitat Regulations produced for us in support of the plan”. Throughout the Local Plan preparation process, EDDC, as the ‘competent authority’ have demonstrated a widespread cavalier attitude, or a fundamental misunderstanding, regarding their

obligations under the Conservation of Habitats and Species Regulations. The HRA should have informed the decision making and must not show conflict prior to progressing to Regulation 19 publication. By producing the HRA after agreeing the Regulation 19 Draft Local plan, the LPA have possibly erred in law. The NPPF states “Significant adverse impacts on these [environmental] objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.” Which is part of the Mitigation Hierarchy, which does not appear to have been applied to the site selection process. I was concerned of the lack of consultation with Natural England regarding the allocation of Exmo_20, as until the 3rd September 2024 it was not proposed to be allocated (and owing to the fact it failed the HELAA assessment, in accordance with the Site Selection Methodology May 2022, could never be). A freedom of information request was made to Natural England, who confirmed that they had at no point been consulted regarding Exmo_20 being allocated [attached FOI NE] therefore EDDC have failed with their Duty to Co-operate obligation. Please note that this observation is for one site with one statutory body, so it is possible that non compliance with Section 33A of the PCPA 2004 and Section 18 of the The Town and Country Planning (Local Planning) (England) Regulations 2012 is applicable to multiple site allocations and multiple statutory bodies. On 4th February, despite the HRA published on 30th January stating under 9.9 “there is inherent conflict in that the growth proposed in the Plan would exceed threshold levels and there is, as yet, no means to mitigate or address the risks.”, Ed Freeman advised the SPC councillors that “we are satisfied it can be mitigated”, based on conversations he has had. After the meeting I emailed Ed Freeman to ask for evidence to back up the assertion he gave to the SPC, but he replied stating “I do not intend to respond to these messages or future messages on these matters” [Freeman emails attached]. I feel the SPC were misled by Ed Freeman assertion upon which he has provided no foundation or evidence to substantiate his claim. Furthermore, having a Plan in conflict with the HRA makes it not sound and not lawful and the Plan should not have progressed to Regulation 19 publication stage. The Procedure Guide for Local Plan Examinations states: Section 1. The LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. Procedure Guide for Local Plan Examinations - GOV.UK

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As EDDC have not demonstrated they understand their duty as the "competent authority" under the Habitats Regulations

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As a local resident I have had no opportunity to object to the proposed allocation. Every consultation and document seen shows Exmo_20 as rejected and not to be allocated, ever since it was deemed “not suitable or achievable” at HELAA stage. This is a breach of the LPA’s duty to co-operate. Under the Town and Country Planning (Local Planning) (England) Regulations 2012, LPAs must engage with relevant stakeholders, including town and parish councils, as part of the Duty to Cooperate and the public consultation process. Key points include:

1. Duty to Cooperate – LPAs must engage with local councils and other statutory bodies in plan-making.
2. Regulation 18 Consultation – Early-stage consultation where town councils can provide input.
3. Regulation 19 Consultation – Formal publication of the draft plan, where the town council can submit representations before it goes to examination. Section 18 of the Regulations state: 18.—(1) A local planning authority must— (a)notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and (b)invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain. (2) The bodies or persons referred to in paragraph (1) are— (a)such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan; (b)such of the general consultation bodies as the local planning authority consider appropriate; and (c)such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

Taking into account that from the main site access point of Exmo_20 the nearest town centre is Budleigh Salterton, the nearest Primary School is in Budleigh Salterton and the nearest doctors is in Budleigh Salterton, I cannot see why EDDC determined that Budleigh Salterton was not “relevant” to the proposed Exmo_20 allocation so did not consult the Town Council. This is a breach of the LPA’s duty to co-operate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure I have a formal opportunity to object to the proposed allocation of Exmo_20, as there has not been no opportunity yet.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Resubmitting due to ongoing issues with commonplace: The three tests of the HELAA are of availability, suitability and achievability. The site was deemed available, however this is a false statement, it was unquestionably not and it appears no checking was undertaken by the LPA to confirm that the 'Call for Site' submission was factually correct. The submission covers two land owners (redacted information), however, the site included multiple properties outside of the submitter's noted ownership and control, none of which have given consent or been notified that their property is included for allocation. The owners of the properties, including the church and multiple privately owned dwellings have confirmed their property is not available. This false claim of availability was raised by an owner, Mr Winn, in August 2022 [emails attached] and not addressed, and I raised this after the site was allocated on 3rd September 2024 (notably with EDDC stating no reconsideration of allocated sites permitted). Matt Dickins (EDDC Planning Policy) confirmed by email to me [attached] that no ownership checks were done prior to the vote to allocate, stating: "The large numbers of paper that have been going to committee have been prepared over several weeks and have drawn on data and information that has been logged in records over a longer period. We lack the resources to scrutinise every record in full detail and up to a point have to rely on third party submissions. Site 20, in total, was favoured by committee as a potential allocation, rather than being an officer recommendation, and as such we as officers, until committee endorsement, had not explicitly examined all site aspects in full detail, rather we were drawing on information held in records. We do not have signed papers from all landowners that they all wish to bring development forward, rather we are working on the basis that Eagle Investments (or under subsidiary or partner company or organisation names and their agents) are acting for and on behalf of all landowners."

This confirms that the HELAA process relating to ‘availability’ is unjustified and of no merit and the LPA have displayed a cavalier attitude to checking availability, contrary to the HELAA methodology 5.16. The conclusion of HELAA for Exmo_20 should have been “not available, not suitable & not achievable.”

It is worth noting that the SPC councillors on 3rd September 2024 were evidently attracted by the apparent size of this site shown on the map to deliver significant housing numbers, again demonstrating how the incorrect information provided by the Planning Policy team was misleading. The Planning Policy team knew that the site was not available [Mr Winn’s email dated 14.08.22 attached], yet presented it that it was, this is unlawful.

The site as shown on p.326 of the February 2025 Publication draft Local Plan Sustainability Appraisal shows the Exmo_20 site which is evidently not available, for the LPA to present it as available is unsound and unlawful.

The LPA failed in its duty to co-operate, as by EDDC considering and allocating this site, there were relevant stakeholders, such as Mr Winn, that were at no point made aware that their land has been allocated and still to date have not been consulted or notified.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site allocation Exmo_20 must be removed from the Local Plan and sites that were stated as preferred in the agenda of the 3rd September 2024 Strategic Planning Committee meeting allocated as alternative sites.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Resubmitting due to ongoing issues with commonplace: The three tests of the HELAA are of availability, suitability and achievability. The site was deemed available, however this is a false statement, it was unquestionably not and it appears no checking was undertaken by the LPA to confirm that the 'Call for Site' submission was factually correct. The submission covers two land owners (redacted information), however, the site included multiple properties outside of the submitter's noted ownership and control, none of which have given consent or been notified that their property is included for allocation. The owners of the properties, including the church and multiple privately owned dwellings have confirmed their property is not available. This false claim of availability was raised by an owner, Mr Winn, in August 2022 [emails attached] and not addressed, and I raised this after the site was allocated on 3rd September 2024 (notably with EDDC stating no reconsideration of allocated sites permitted). Matt Dickins (EDDC Planning Policy) confirmed by email to me [attached] that no ownership checks were done prior to the vote to allocate, stating: "The large numbers of paper that have been going to committee have been prepared over several weeks and have drawn on data and information that has been logged in records over a longer period. We lack the resources to scrutinise every record in full detail and up to a point have to rely on third party submissions. Site 20, in total, was favoured by committee as a potential allocation, rather than being an officer recommendation, and as such we as officers, until committee endorsement, had not explicitly examined all site aspects in full detail, rather we were drawing on information held in records. We do not have signed papers from all landowners that they all wish to bring development forward, rather we are working on the basis that Eagle Investments (or under subsidiary or partner company or organisation names and their agents) are acting for and on behalf of all landowners."

This confirms that the HELAA process relating to 'availability' is unjustified and of no merit and the LPA have displayed a cavalier attitude to checking availability, contrary to the HELAA methodology 5.16. The conclusion of HELAA for Exmo_20 should have been "not available, not suitable & not achievable."

It is worth noting that the SPC councillors on 3rd September 2024 were evidently attracted by the apparent size of this site shown on the map to deliver significant housing numbers, again demonstrating how the incorrect information provided by the Planning Policy team was misleading. The Planning Policy team knew that the site was

not available [Mr Winn's email dated 14.08.22 attached], yet presented it that it was, this is unlawful.

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The LPA failed in its duty to co-operate, as by EDDC considering and allocating this site, there were relevant stakeholders, such as Mr Winn, that were at no point made aware that their land has been allocated and still to date have not been consulted or notified.

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4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Resubmitting due to ongoing issues with commonplace: The three tests of the HELAA are of availability, suitability and achievability. The site was deemed available, however this is a false statement, it was unquestionably not and it appears no checking was undertaken by the LPA to confirm that the 'Call for Site' submission was factually correct. The submission covers two land owners (redacted information), however, the site included multiple properties outside of the submitter's

noted ownership and control, none of which have given consent or been notified that their property is included for allocation. The owners of the properties, including the church and multiple privately owned dwellings have confirmed their property is not available. This false claim of availability was raised by an owner, Mr Winn, in August 2022 [emails attached] and not addressed, and I raised this after the site was allocated on 3rd September 2024 (notably with EDDC stating no reconsideration of allocated sites permitted). Matt Dickins (EDDC Planning Policy) confirmed by email to me [attached] that no ownership checks were done prior to the vote to allocate, stating: “The large numbers of paper that have been going to committee have been prepared over several weeks and have drawn on data and information that has been logged in records over a longer period. We lack the resources to scrutinise every record in full detail and up to a point have to rely on third party submissions. Site 20, in total, was favoured by committee as a potential allocation, rather than being an officer recommendation, and as such we as officers, until committee endorsement, had not explicitly examined all site aspects in full detail, rather we were drawing on information held in records. We do not have signed papers from all landowners that they all wish to bring development forward, rather we are working on the basis that Eagle Investments (or under subsidiary or partner company or organisation names and their agents) are acting for and on behalf of all landowners.”

This confirms that the HELAA process relating to ‘availability’ is unjustified and of no merit and the LPA have displayed a cavalier attitude to checking availability, contranry to the HELAA methodology 5.16. The conclusion of HELAA for Exmo_20 should have been “not available, not suitable & not achievable.”

It is worth noting that the SPC councillors on 3rd September 2024 were evidently attracted by the apparent size of this site shown on the map to deliver significant housing numbers, again demonstrating how the incorrect information provided by the Planning Policy team was misleading. The Planning Policy team knew that the site was not available [Mr Winn’s email dated 14.08.22 attached], yet presented it that it was, this is unlawful.

The site as shown on p.326 of the February 2025 Publication draft Local Plan Sustainability Appraisal shows the Exmo_20 site which is evidently not available, for the LPA to present it as available is unsound and unlawful.

The LPA failed in its duty to co-operate, as by EDDC considering and allocating this site, there were relevant stakeholders, such as Mr Winn, that were at no point made aware that their land has been allocated and still to date have not been consulted or notified.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure shortcomings in the HELAA process are given due consideration.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Submitting again due to ongoing Commonplace issues: EDDC have tried to change the Site Selection Methodology (SSM) to justify Exmo_20. The SSM dated May 2022 is the one used for the Regulation 18 process [attached]. After 11th December 2024 (the date the draft local plan was approved to proceed to regulation 19 publication) this was amended and this December 2024 amended version put in the evidence library for the Regulation 19 consultation. The original May 2022 version, used for the Regulation 18 stage, has wording that does not allow Exmo_20 to be selected. Extracts below:

- Stage 2: Site Sifting 1.8 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further. Only sites which meet criteria a), b) and c) are carried forward to Stage 3. These criteria are shown in figure 2 below.
- criteria a) Site is assessed as ‘suitable, available and achievable’ in the HELAA6
- Subtext point 6 states: It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but, if not, such sites should be sifted out at Stage 2. The revised December 2024 version, not used but presented in the evidence library (the only version present), has been amended to ensure the Site Selection Methodology evidence document does not show conflict with the Reg19 draft Local Plan, specifically the Exmo_20 allocation.

Revised December 2024 version amendments noted:

- Stage 2: Site Sifting 1.7 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further (see figure 2). Only sites which meet criteria a), b) and c) are carried forward to Stage 3. In exceptional circumstances, sites may continue to Stage 3 even if

they fail to meet the sifting criteria – such cases will be clearly justified. This could include potential gypsy and traveller site allocations, which are often located in the countryside. Similarly, some sites may pass the site sifting criteria but may not be considered a ‘reasonable alternative’ for other reasons and therefore should not be assessed at Stage 3 – again, this will need to be clearly justified on a site-specific basis.

- Subtext point 6 from May 2022 version deleted.

As the HELAA methodology is a key early stage of plan development based on broad planning policy context derived from the NPPF, to insert a clause that trumps the HELAA conclusions in essence is a clause to trump the NPPF. Therefore sites, such as Exmo_20 that were deemed “not suitable or achievable” in the HELAA process but are now allocated, cannot be considered ‘justified’, ‘effective’ or ‘consistent with national policy’ and the Plan is therefore not sound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the site allocations and select alternatives from those shown as preferred in the agenda for 3rd September 2024 Strategic Planning Committee meeting.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand how a site that is not suitable or achievable for development (HELAA) can be considered to be able to deliver significant levels of development, as to date the LPA have not demonstrated how this contradiction will be overcome.

Full name: Thomas Shillitoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The allocation of Exmo_20 with SD01 is unsound & not legally compliant and the LPA failed in their duty to co-operate in the process of allocating this site.

Firstly, Exmo_20 was deemed available but not suitable or achievable in the HELAA process, as shown in HELAA Appendix E(v)1. On 3rd September this site was selected as allocated by the Strategic Planning Committee, despite the fact that there was no justifiable way, based on the May '22 Site Selection Methodology (attached) it could be. The Draft Local Plan was approved to progress to Regulation 19 consultation stage by the Strategic Planning Committee on 11th December 2024 with Exmo_20 allocated.

At some in December, after the publication of the new NPPF on 12th December, the Site Selection Methodology and this December 2024 version that is loaded into the Evidence Library as the "Site Selection Methodology", with no mention of the one that was used for the Regulation 18 stage. There appears to be no formal discussion or approval process for the revised "Site selection Methodology" and it appears that the supporting evidence has been altered to suit the draft Local Plan, which would be unlawful. The original May '22 version, used for the Regulation 18 stage, has wording that does not allow Exmo_20 to be selected. Extracts below:

- Stage 2: Site Sifting 1.8 Following the 'long list' of sites identified in Stage 1, a 'sifting' process will be carried out to ensure that only 'reasonable alternatives' are considered further. Only sites which meet criteria a), b) and c) are carried forward to Stage 3. These criteria are shown in figure 2 below.
- criteria a) Site is assessed as 'suitable, available and achievable' in the HELAA6

- Subtext point 6 states: It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but, if not, such sites should be sifted out at Stage 2. The revised Dec24 version, not used but presented in the evidence library (the only version present), has been amended to ensure the Site Selection Methodology evidence document does not show conflict with the Reg19 draft Local Plan, specifically the Exmo_20 allocation.

Revised Dec24 version amendments noted:

- Stage 2: Site Sifting 1.7 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further (see figure 2). Only sites which meet criteria a), b) and c) are carried forward to Stage 3. In exceptional circumstances, sites may continue to Stage 3 even if they fail to meet the sifting criteria – such cases will be clearly justified. This could include potential gypsy and traveller site allocations, which are often located in the countryside. Similarly, some sites may pass the site sifting criteria but may not be considered a ‘reasonable alternative’ for other reasons and therefore should not be assessed at Stage 3 – again, this will need to be clearly justified on a site-specific basis.
- Subtext point 6 from May22 version deleted. Furthermore, the Sustainability Appraisal is incorrect and misleading, stating that Exmo_20 was deemed “Available, suitable & achievable” in the HELAA process. The Site Selection Report - Exmouth (February 2025) omits Exmo_20 from the paragraph 1.7 list of site which did not pass site sifting. This report summarises "to pass site sifting and therefore be considered as a potential allocation, the site should be identified as suitable, available, achievable in the HELAA".

Because the site failed site sifting and was not preferred or alternative/second choice, it missed significant consideration or consultation through the Regulation 18 stage therefore the LPA failed in their duty to co-operate in the process of allocating this site.

With the above in mind, it is clear that decision makers, such as the SPC could have been misinformed, relying on incorrect information to form opinions, such that their judgement was unjustified and therefore unsound. Amending supporting evidence documents is unlawful.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the allocation of Exmo_20 from the Local Plan. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 with SD01 is unsound & not legally compliant and the LPA failed in their duty to co-operate in the process of allocating this site.

Firstly, Exmo_20 was deemed available but not suitable or achievable in the HELAA process, as shown in HELAA Appendix E(v)1. On 3rd September this site was selected as allocated by the Strategic Planning Committee, despite the fact that there was no justifiable way, based on the May '22 Site Selection Methodology (attached) it could be. The Draft Local Plan was approved to progress to Regulation 19 consultation stage by the Strategic Planning Committee on 11th December 2024 with Exmo_20 allocated.

At some in December, after the publication of the new NPPF on 12th December, the Site Selection Methodology and this December 2024 version that is loaded into the Evidence Library as the “Site Selection Methodology”, with no mention of the one that was used for the Regulation 18 stage. There appears to be no formal discussion or approval process for the revised “Site selection Methodology” and it appears that the supporting evidence has been altered to suit the draft Local Plan, which would be unlawful. The original May '22 version, used for the Regulation 18 stage, has wording that does not allow Exmo_20 to be selected. Extracts below:

- Stage 2: Site Sifting 1.8 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further. Only sites which meet criteria a), b) and c) are carried forward to Stage 3. These criteria are shown in figure 2 below.
- criteria a) Site is assessed as ‘suitable, available and achievable’ in the HELAA6
- Subtext point 6 states: It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but, if not, such sites should be sifted out at Stage 2. The revised Dec24 version, not used but presented in the evidence library (the only version present), has been amended to ensure the Site

Selection Methodology evidence document does not show conflict with the Reg19 draft Local Plan, specifically the Exmo_20 allocation.

Revised Dec24 version amendments noted:

- Stage 2: Site Sifting 1.7 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further (see figure 2). Only sites which meet criteria a), b) and c) are carried forward to Stage 3. In exceptional circumstances, sites may continue to Stage 3 even if they fail to meet the sifting criteria – such cases will be clearly justified. This could include potential gypsy and traveller site allocations, which are often located in the countryside. Similarly, some sites may pass the site sifting criteria but may not be considered a ‘reasonable alternative’ for other reasons and therefore should not be assessed at Stage 3 – again, this will need to be clearly justified on a site-specific basis.
- Subtext point 6 from May22 version deleted. Furthermore, the Sustainability Appraisal is incorrect and misleading, stating that Exmo_20 was deemed “Available, suitable & achievable” in the HELAA process. The Site Selection Report - Exmouth (February 2025) omits Exmo_20 from the paragraph 1.7 list of site which did not pass site sifting. This report summarises "to pass site sifting and therefore be considered as a potential allocation, the site should be identified as suitable, available, achievable in the HELAA".

Because the site failed site sifting and was not preferred or alternative/second choice, it missed significant consideration or consultation through the Regulation 18 stage therefore the LPA failed in their duty to co-operate in the process of allocating this site.

With the above in mind, it is clear that decision makers, such as the SPC could have been misinformed, relying on incorrect information to form opinions, such that their judgement was unjustified and therefore unsound. Amending supporting evidence documents is unlawful.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the allocation of Exmo_20 from the Local Plan. Other sites, shown as preferred within the

Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The allocation of Exmo_20 with SD01 is unsound & not legally compliant and the LPA failed in their duty to co-operate in the process of allocating this site.

Firstly, Exmo_20 was deemed available but not suitable or achievable in the HELAA process, as shown in HELAA Appendix E(v)1. On 3rd September this site was selected as allocated by the Strategic Planning Committee, despite the fact that there was no justifiable way, based on the May '22 Site Selection Methodology (attached) it could be. The Draft Local Plan was approved to progress to Regulation 19 consultation stage by the Strategic Planning Committee on 11th December 2024 with Exmo_20 allocated.

At some in December, after the publication of the new NPPF on 12th December, the Site Selection Methodology and this December 2024 version that is loaded into the Evidence Library as the “Site Selection Methodology”, with no mention of the one that was used for the Regulation 18 stage. There appears to be no formal discussion or approval process for the revised “Site selection Methodology” and it appears that the supporting evidence has been altered to suit the draft Local Plan, which would be unlawful. The original May '22 version, used for the Regulation 18 stage, has wording that does not allow Exmo_20 to be selected. Extracts below:

- Stage 2: Site Sifting 1.8 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further. Only sites which meet criteria a), b) and c) are carried forward to Stage 3. These criteria are shown in figure 2 below.
- criteria a) Site is assessed as ‘suitable, available and achievable’ in the HELAA6
- Subtext point 6 states: It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but, if not, such sites should be sifted out at Stage 2. The revised Dec24 version, not used but presented in the evidence library (the only version present), has been amended to ensure the Site Selection Methodology evidence document does not show conflict with the Reg19 draft Local Plan, specifically the Exmo_20 allocation.

Revised Dec24 version amendments noted:

- Stage 2: Site Sifting 1.7 Following the ‘long list’ of sites identified in Stage 1, a ‘sifting’ process will be carried out to ensure that only ‘reasonable alternatives’ are considered further (see figure 2). Only sites which meet criteria a), b) and c) are carried forward to Stage 3. In exceptional circumstances, sites may continue to Stage 3 even if they fail to meet the sifting criteria – such cases will be clearly justified. This could include potential gypsy and traveller site allocations, which are often located in the countryside. Similarly, some sites may pass the site sifting criteria but may not be considered a ‘reasonable alternative’ for other reasons and therefore should not be assessed at Stage 3 – again, this will need to be clearly justified on a site-specific basis.
- Subtext point 6 from May22 version deleted. Furthermore, the Sustainability Appraisal is incorrect and misleading, stating that Exmo_20 was deemed “Available, suitable & achievable” in the HELAA process. The Site Selection Report - Exmouth (February 2025) omits Exmo_20 from the paragraph 1.7 list of site which did not pass site sifting. This report summarises "to pass site sifting and therefore be considered as a potential allocation, the site should be identified as suitable, available, achievable in the HELAA".

Because the site failed site sifting and was not preferred or alternative/second choice, it missed significant consideration or consultation through the Regulation 18 stage therefore the LPA failed in their duty to co-operate in the process of allocating this site.

With the above in mind, it is clear that decision makers, such as the SPC could have been misinformed, relying on incorrect information to form opinions, such that their judgement was unjustified and therefore unsound. Amending supporting evidence documents is unlawful.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure the unreasonable behaviour of the LPA is adequately considered.

Full name: Grant Shipcott

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As a resident of Exmouth I have strong objections to the proposal to build over 400 houses on the eastern edge of Exmouth. Firstly the area is protected by National Landscape status, being truly an area of outstanding beauty, and its expedient acquisition will be greatly regretted. Secondly, there is already inadequate infrastructure for a growing town which is notorious for its overwhelmed sewage system and single-carriageway road from the M5. My chief concern however is that, if the development is primarily aimed at addressing the housing problem, it will fail in this intention because the location in AONB/NL land will inevitably attract "high-end" buyers who will require appropriately sized and equipped properties. Is the "housing problem" connected to £500k+ buyers? No, I don't believe it is - it's about lower-income families and 1st-time buyers who could never aspire to own a property such as the ones which EDDC plan to have built on this prime green space. This whole shameful proposal will do nothing for the most needy families. It may be remembered more as a cash grab by Clinton Estates, who must have rubbed their hands with glee when they heard about the plan.

Full name: C Shipton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (high street, doctors, school, existing SEWAGE FAILURES) would be the preferred choice of Exmo_20 residents. This undermines the settlement hierarchy and would lead to the coalescence of Budleigh & Exmouth contrary to POLICY OL05 of the local plan.

Full name: C Shipton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

Full name: Karen Sims

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Chris Sims

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. Water containment at Goodmoores already proving ineffective.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, (as has already happened with Topsham and the Exeter suburbs)with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship and contemplation which currently exists for the congregation.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be severely impacted by the development of Exmo_20.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network,

part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could completely undermine the conservation objectives of the SPA.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out increased pollution and adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not a 'modest' nor in the least sensitive development. It is a 'comprehensive development scheme' within a rural part of East Devon.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard, with a high vehicular accident rate.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has; which is detrimental to a town reliant on visitors in the summer.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles thereby emitting more co2.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion and hardship.

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179, which is quite narrow and consistently breaking up with the present traffic load) to access them within Exmouth or neighbouring settlements

Full name: Sally Sinclair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 in my opinion is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycomb, where the water level has risen significantly over the last few years due to already increased building at the top of Dinan Way with no effective run-off.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths, leading to a significant erosion of our habitat.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. Parking in Budleigh Salterton is already at a premium.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation and the deer that visit the graveyard. (POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings).

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network,

part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA).

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon, and certainly not sensitive in anyway.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard, the B3179 probably one of the worst maintained roads in the county.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has, with raw sewage being tankered hourly for many weeks only a few months ago.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

vALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few and mainly for pleasure or exercise not to convey goods. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide the necessary key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements.

Full name: GORDON SINCLAIR

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast with only two roads in and out. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development on the EXMO20 site will be a long distance from the town such that it is an unsustainable location.

Full name: Ellen Singleton-Wood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Introduction This development would destroy the natural beauty of the approach to Budleigh with its extensive views across the fields to the sea. It would impact on nature in the surroundings areas - nesting nightjars at Pebble bed heaths; noise and light pollution at our beautiful Bystock ponds and heathland. We are supposed to be giving nature a chance not destroying it further. Infill and use brown field sites - build homes for essential workers within existing communities where people can walk and cycle to local facilities.

Objections with reasons

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan. ? An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. ?

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site contrary to paragraph 13.9

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the “tranquility, wildness and dark skies”, which is contrary to POLICY OL01. ? Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA. ? Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I consider this planning to be contrary to the character of East Devon and shows lack of knowledge and expertise from those on the planning committee.

Full name: Cheryl Skeggs

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17

Full name: Sarah Carolyn Skerratt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Too far from all services. No public transport nearby so increased use of cars because hilly and E.D. population is older than many places.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Inadequate infrastructure, medical services, schools, public transport, sewage

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It will permanently damage the countryside including the Pebblebed Heaths which have rare species i.e. nightjars. There are supposed to be connecting wildlife corridors and these are already being built over. Extra lights at night will be harmful, i.e. car headlights. Mature trees hedgerows etc will be permanently damaged and not quickly replaced. One settlement is not supposed to be joined to another and Exmouth and Budleigh Salterton will be. Roads are already congested and this will make it much worse. Medical services are already overstretched, schools are not adequate, there will be greater flood risk and the sewage disposal is already poor and not easily improved.. There has been a lack of consultation and I think this is not legally compliant.

Full name: Mr Julian Clive Sleeman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo20 Will cause harm to heritage assets including St John in the Wilderness a grade 2 listed church eroding the purpose of this site. Exmo20 will have a detrimental effect on the Pebble bed heathland, also in contrary to Policy OL01 and strategic nature area 368. Development of Exmo20 on heavy clay sub soil will exacerbate downstream flood risk via Withycombe brook which is already beyond its design capacity therefore in conflict with policy AR01B. There is no capacity to cope with extra run off water and sewage, until these points are in place there should be no further planning applications passed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the local plan, site should not have access via B3179 or southern wood as neither options could cope with higher levels of traffic in particular around rush hour traffic.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mr Graham Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the

Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to

POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying

land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key

services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is

contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor’s, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: MR ANTHONY SMITH

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Kerin Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: *

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

* The Habitats Regulations assessment (30.01.25) confirms that there is?"currently not sufficient certainty to rule out adverse effects in integrity in relation to... air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

* Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. * Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than

Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo?_20. This would lead to coalescence of Budleigh and?Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: * Remove Exmo_20 from the Local Plan * Reduce the size of Exmo_20 * Do not access the site via the B3179 * Do not access the site via Southern Wood * Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Stephen Bower Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

...Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

...Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

...Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE 02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

...Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

...The main access point to Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Diana smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach, parking etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary TO POLICY OL05 of the Local Plan. It would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. Residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6 and too far and too steep from any town centre to walk or cycle to. Contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: David Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less harm to the pebbled Heaths (SAC/SPA). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the tranquillity, wildness and dark skies of the countryside contrary to Policy OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species, and rich hedgerows across the site, contrary to Paragraph 13.9. The Habitats Regulations assessment (30/01/25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to.....air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with Policy OL09 and Policy PB04. Exmo_20 would have significant adverse effects on St. John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship for the congregation. This is contrary to Policy HE02. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with Policy AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion in conflict with Paragraph 11.2. It is an unsustainable development requiring the local population to travel much further than 800m to existing key services and facilities contrary to Paragraph 11.6. It is too far (and too steep) from any town centre for people to choose to walk or cycle. This is contrary to Policy TR01. The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Surgery, School, beach etc.) would be the obvious choice for the residents of Exmo_20. This would lead to progressive merging of Budleigh with Exmouth, contrary to Policy OL05 of the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MR ANTHONY SMITH

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. * The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach

etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Hannah Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

The sewage infrastructure in Exmouth is not fit for purpose as it is. In 2024, there were 65 pollution incidents into the sea at Exmouth. Adding more houses to an already overloaded system would only exacerbate this.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lisa Blood Smyth

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. the services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies" which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to the irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jane Speake

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

In addition, the local infrastructure is already stretched beyond capacity, especially in terms of the roads and our woefully inadequate sewage system.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Jane Speake

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I'm writing to express my major concerns about the plans to build 700 houses along St John's Road (Exmo-20). Currently and historically this area provides a natural boundary along the edge of Exmouth, with unique environmental value.

The road system, our woefully inadequate sewage system and infrastructure in terms of educational and health services is not fit for purpose. I regularly use this area as a pedestrian, including walking up to the churchyard at St John's where my parents are buried. Already, I take my life into my hands crossing Dinan Way and traffic issues will become much worse with the new road. The cars from 700 new houses will add to this, not least because people will be entirely dependent on cars to get anywhere.

I'm not opposed to new development in principle. I hope the new road will deliver what it has been promised in spite of the fact that it will impact on me in terms of traffic noise levels. However, there is nothing in these proposed plans that convinces me that this is just another opportunity for developers to make lots of money, selling expensive houses to people moving into the area, delivering nothing that is needed by local people.

I write with hope rather than optimism. I don't believe that the views of local people will be taken into account, and will be dismissed as nimbyism. However, the least I can do is voice my concerns, to stand up for what will be lost forever in our beautiful town.

Full name: Julie Stacey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17.

Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale buildings on it.

If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise.

The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. This is enjoyed by many local people and visitors alike.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Stefan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Exmo_20 would increase the need for car and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Marilyn Stephen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people living there would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. The development is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High St, doctors, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. Importantly the development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the Local Plan and not in accordance with the mitigation strategy. It would fragment and isolate habitats and destroy Wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Radically reduce the size of Exmo_20 or revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Cindy Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: All Exmouth people, including those who can't travel, need to see fields, open spaces and wild animals locally (within walking distance.) Exmo_20 would increase the need for car travel, increase traffic congestion, in conflict with PARAGRAPH 11.2. Too much concrete, roads and houses, all cramping roads, which is currently bad. (Potholes not being managed.) The Town is already full, and too busy. Holiday makers, visitors, traffic jammers, accidents, crime, vandalism and antisocial behaviour, More housing will further escalate the problem, and more strain on locals. It is an unsustainable development. Too isolated, people would need to travel much further than 800m to existing key services and facilities contrary to PARAGRAPH 11.6. Too far from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. Exmo_20 closer to Budleigh Salterton than Exmouth, Budleigh is the most convenient and accessible town. Services and infrastructure of Budleigh (Shops, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. We fear the collapse of Exmouth's popularity, by changing the layout that people from the city's come to visit and appreciate. The value of the land is priceless as it is. Protect it, or it will be gone. We need to appreciate the land which has its beauty naturally, adds true value to the look and health of Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I have local knowledge.

Full name: Cindy Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Look at the land, take a breath of the air and listen to the lovely sounds of the birds. Birds of prey, bats, foxes, badgers, deer, woodpeckers, hedgehogs, bullfinches, house sparrows, already live on the land. Sharing it with sheep and horses. All that will be gone if this housing goes through. Killing a lot of Exmouth animal residents, which when you stop, watch and get to know, are priceless. The ratio of domestic cats and wildlife would be unbalanced, killing the wildlife. The Habitats Regulations assessment (30.01.25) “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. Conflicting POLICY AR01B.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Local voice.

Full name: Cindy Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed development Exmo_20 should be located on an alternative site where it would cause no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. People make a personal choice to live with fields near, believing the outskirts are protected, however Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. Let Exmouth have the option. Exmouth's birds and mammals need Fields, Trees and Hedges away from the public to thrive, safe from human harm. The ratio of wildlife space, and biodiversity versus houses, roads and people would be unbalanced. Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. Detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I have a local voice.

Full name: Gareth Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed development Exmo_20 should be located on an alternative site where it would cause no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. People make a personal choice to live with fields near, believing the outskirts are protected, however Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. Let Exmouth have the option. Exmouth's birds and mammals need Fields, Trees and Hedges away from the public to thrive, safe from human harm. The ratio of wildlife space, and biodiversity versus houses, roads and people would be unbalanced. Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. Detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I have local voice.

Full name: Gareth Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase car traffic congestion, conflicting with PARAGRAPH 11.2. It is an unsustainable development, isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far from the town centre for people to use walking or cycling as their choice of transport. Contrary to POLICY TR01.

The main access point to Exmo_20 is actually closer to Budleigh Salterton than Exmouth. So Budleigh it's most accessible town. The services and infrastructure of Budleigh (Shops, Doctor's, school, beach etc) would be the closest choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please remove Exmo_20 from Development Plans.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Local information.

Full name: Gareth Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

When the Habitats Regulations assessment was carried out on 30.01.25, this decided that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 being upstream of Exmouth is the main rainwater catchment area of Withycombe Brook, having a subsoil of heavy clay which makes soakaways ineffective. Exacerbating the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. Conflicting with POLICY AR01B.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Local opinions.

Full name: Gareth Stevenson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Exmo_20 proposed development should be at an alternative site, stopping any harm to the Pebblebed Heaths (SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 local plan and isn't in accordance with the mitigation strategy.

I believe Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, contrary to POLICY OL01.

Exmo_20 fragments and isolates habitats, destroying wildlife corridors, contrary to PARAGRAPH 13.23 Local Plan. Also being detrimental to habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20 should be removed from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I local person such as myself can personally explain why Exmo_20 needs removing from proposals.

Full name: Dr Richard Stewart

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I think the proposed development at Exmo_20 should be located on an alternative site so it doesn't affect the pebble bed heaths (SAC/SPA). I believe that Exmo_20 is contrary to POLICY PB01 of the local plan and doesn't appear in line with the mitigation strategy. Exmo_20 would destroy the tranquility, wildness and dark skies of the countryside contrary to Policy OL01, in particular is adjacent to areas used by nightjars for feeding and display - a nocturnal and rare bird species well known to be adversely affected by additional lighting. Exmo_20 would affect wildlife corridors and be detrimental to irreplaceable habitats, trees and species rich hedgerows and be adjacent to the very special Bystock Pools nature reserve - a unique wildlife haven and habitat. I believe that Exmo_20 would adversely affect water drainage and increase flood risk on low lying land. It would also increase traffic congestion, and due to its location would adversely increase the pressure on local services in Budleigh Salterton contrary to Paragraph 11.6.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan. If not, reduce the size of Exmo_20 and do not access the site via to B3179 or via Southern Wood.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: · Remove Exmo_20 from the Local Plan, · Reduce the size of Exmo_20, · Do not access the site via the B3179, · Do not access the site via Southern Wood,

· Revert to Exmo_20b as previously proposed. THIS SEEMS THE MOST APPROPRIATE, AS IT WAS THE INITIAL RECOMMENDATION.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot

simply be mitigated by planting new trees. Exmo_20 also contains many long-established hedgerows across the site, the lengths of which are considerable.

The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council. Why has this position changed? Why was appropriate representation and consultation not put in place during the change of status?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. It appears to be misleading and of an underhand nature that the status was suddenly changed without opportunity for representation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. This does not fit in with the overall plan's objectives.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard.

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the massive problem it has.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of

0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and may well cause social exclusion.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements such as Woodbury or Budleigh Salterton.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Stock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages (e.g. Budleigh Salterton) and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Richard Stokes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Christine Stoodley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Nigel Strawbridge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmouth_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Robert Street

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. IT would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and opal would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to policy TR01.

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, school, beach etc) would b the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The development location should be moved to an alternate site, e.g. Exmo_20b as previously proposed. Any new development should include covenants for properties to only be available to those who have lived and worked in the area for a period of 3 years. This will ensure that Exmouth provides houses for those that need it and not those wishing to relocate, increase strain on infrastructure and services.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Strong

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo _20b as previously proposed.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am not convinced a balance of all voices will be heard without representation

Full name: Ian John stuart

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It's too important to ignore

Full name: Hayley Sutton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach

etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Susan Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Who owns this land? If it is National Trust then it belongs to the people whose wishes and opinions should be addressed.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

Exmouth has been continually reported in 2024 as one of the most polluted towns on the coast. The red flag closing the beach area due to the dangers of sewage on the beach and in the sea was disgraceful. More housing leads to more sewage and other services.

Can the Council explain where and how the network of SW Water supply and disposal of water and waste can be maintained for the proposed building on such a massive scale in our town?

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Ref page 78 of the draft local plan-Vehicular access: I have concerns about what mechanisms will be put in place to prevent private cars from the upper site accessing roads where public transport buses will use to travel through southern wood and into meadow view road, therefore the whole site will be accessible by car through these two already congested roads, the on street parking in these roads with private vehicles is heavy, with cars parked on pavements through many areas, pedestrian access with prams and mobility scooters are forced into the road to pass. Buses through meadow view and southern wood will be difficult to progress with cars parked on both sides making it very narrow.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Attending hearing session(s) is vitally important, I believe, as I reside in one of the access roads on the southern boundary it is in my best interest to be present at such a hearing.

Full name: Karen Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, doctors, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to a coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. Exmo_20 would increase the need for car travel, contrary to fig 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan Reduce the size of Exmo_20 Do not access the site via B3179 Do not access the site via Southern Wood Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Health and well-being. In terms of health and well-being, the NPPF emphasises the importance of creating healthy and sustainable communities. The lack of school places , GP surgeries and additional cars on our heavily congested roads through the town (s) highlight the unattainable nature of the site for both people and climate, contravening the EDDC's own Climate Emergency Action Plan and pledge to achieve carbon neutral council by 2040. This application fails to address these important points

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe that it is an inappropriate access to the site from Southern Wood via Dinan Way via Meadow View Road, it is too convoluted, causing real time problems entering and exiting the proposed development Exmo-20 site.

Access to the site via the B3179 and Southern Wood should be denied as it will result in an additional 770 + cars travelling to surgeries, schools, shops and employment outside the town. It will also greatly contribute to increased: 1) gas emissions, 2) pollution, 3) noise, 4) risk of accidents and contribute to already high commuting traffic in the area. Waste services and emergency would struggle with access from the nominated sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. This application is unsustainable and inadequate in its design for flooding, waste-water and pollution prevention, South West West is already unable to control sewage flowing into the watercourse in this area.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, why I believe our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Access to the site via the B3179 should be denied as it would contribute to already high traffic movement in the area and will result in an additional 770 + cars travelling to surgeries, schools, shops, and employment outside the town. It will also greatly contribute to increased: 1) gas emissions, 2) pollution, 3) noise, 4) risk of accidents and contribute to already high commuting traffic in the area. Waste services and emergency would struggle with access from the nominated sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, which I believe, our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The NPPF highlights the importance of sustainable transportation and connectivity to reduce the impact of urbanisation on traffic congestion, stresses the need to reduce traffic carbon emissions and minimise the impact of development on the environment. This application fails to address these important points.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development highlights Southern Wood as an access road, (outside our front door) that greatly impacts and intrinsically affects our health and wellbeing, which I believe, our views should be heard.

Full name: Barrie Thomas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe that it is an inappropriate access to the site from Southern Wood via Dinan Way via Meadowview Road, it is too convoluted, causing real time problems entering and exiting the proposed development Exmo-20 site.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This proposed development with the access road outside our front door intrinsically affects our health and wellbeing, I believe that our views should be heard.

Full name: Kelly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo 20 could and should be located on an alternative site where it would cause less or no harm to the Pebble bed Heath (sac/spa). Developing Exmo 20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo 20 would destroy the tranquility wildness and dark skies of the countryside which is contrary to POLICY OL01

Developing Exmo 20 would fragment and isolate habitats and destroy wildlife corridors contrary to PARAGRAPH 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veterinary trees and species rich hedgerows across the site contrary to paragraph 13.9.

The habitats regulations assessment (30.01.25) confirms that there is currently not sufficient certainty to rule out adverse effects on st john in the wilderness grade 2 listed church and church yard drastically altering the peaceful setting for worship which currently exists. This is contrary to POLICY HE02 .

Exmo 20 is upstream of Exmouth on the main rainwater catchment area of Withycombe brook on a sub soil of heavy clay which makes soak ways ineffective. It would

exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo 20 would increase the need for car travel and increase traffic congestion, in conflict with paragraph 11.2. It is unsuitable development it is isolated and people would need to travel much further than 800 m to existing key services and facilities, contrary to paragraph 11.6. It is too far and too steep from any town centre for people to use walking or cycling as a mode of transport. This is contrary to POLICY TR01.

The main access point to Exmo 20 is significantly closer to Budleigh salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and Infrastructure of Budleigh, high street, doctors, schools, dentists, beach etc would be the obvious choice for residents of Exmo 20 this would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lisa Thomas-Jenkins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative location should be used so that the pebble bed heath (SAC/SPA) should not be harmed. Developing Exmo_20 contradicts Policy PB01 of the local plan and is not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Robert Thomlinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Sarah Thomlinson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Sophie Thompson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: LYM 07 is another inappropriate designation, lying in the flood catchment Wotton Brook and contravening policy OL03 stating no development should occur in coastal preservation areas.

It will also contravene policy OL05 causing coalescence with Exmouth

Policy 13.23 describes the importance of connected wildlife corridors and not fragmenting habitats. This area designation would effectively compromise this policy. It lies in an area of veteran trees and special hedgerow.

The development would also create additional traffic. Car ownership and usage in Devon is prolific and behaviours ingrained. People will drive to and from this development and not use more active travel methods.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I suggest that GH/ED/72A and 73 and LYM 07 be removed from the Local plan area designations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Thorne BA DipTP MRTPI(Rtd)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site within the respondent's ownership is shown on the Exmouth Inset Map forming part of the Reg. 19 Consultation. It lies to the west and north of Housing allocation site Lymp_07 between that site and the north-south section of Cortlands Lane. On the extract below it is immediately to the west of the letter 'L' of Lymp_07

In the previous Reg.18 version the Lymp_07 site and nearby Exmo_23 sites formed a larger Lymp_07 which was identified as a 'Second Choice' Housing Site.

The site is previously developed land, and the land edged red on the map above benefits from a Certificate of lawful Existing Use (March 2021) for the servicing and sale of motor vehicles. The land edged red comprises some 0.8ha of wider 1.75ha land parcel. The site was the subject of an unsuccessful appeal against refusal of PiP (APP/U1105/W/21/3285255) in April 2022. In making that decision the Inspector concluded, in the following terms, that potentially development would not have an adverse on the Green Wedge designation: " If, for argument's sake, dwellings were to be delivered in the approximate location and of the approximate scale of the existing garage structures, the scheme would likely have no additional impact upon the purposes of the Green Wedge designation." The determinative factors were the Inspector's judgement as to whether the site was problematic in respect of accessibility and whether it would give rise to 'Isolated' development in the countryside. He commented: "In this case, the site is a not inconsiderable walk to the range of services within Lympstone. The connecting roads undulate, turn sharply and are largely bereft of dedicated pedestrian space and street lighting. The route to the nearest bus stops and the small shop at the adjacent petrol station is shorter but similar. On this basis, whilst walking or cycling may be an option for some in some instances, I do not consider that the locational tests set out within Policy 2 of the LNP and Policy TC2 of the EDLP would be met." and: " Whether a proposal is or is not isolated is a matter of planning judgment. The site is clearly well away from Lympstone in an area explicitly identified to provide

visual separation between the two distinct settlements of Lympstone and Exmouth. The properties around the site read as a sporadic smattering of houses within the Green Wedge. As such, they do not appear to form a village or even a smaller settlement. For these reasons, in my judgment the site is also isolated in the Framework's terms." The draft plan includes planned material changes in circumstances which justify reconsideration of these issues. The adjacent 10 Hectares of land to the north of Courtlands Lane between the site and Exmouth Road was identified in the HELAA and the consultation drafts of the EDDC Local Plan 2020-2042 as 'Second Choice' Residential Site Lymp_07 with a capacity of 150 units in the regulation 18. Version. It has since become 'Housing and Employment' site Lymp_07 expected to provide 100 residential units, employment floorspace and sports pitches in the regulation 19. Version, demonstrating that the LPA is committed to ending its 'Isolation'. The Highway authority also suggest the same land is safeguarded in connection with the extension of Dinan Way. The Consultation drafts also designate land on the south side of Courtlands Lane, falling within first Lymp_07 (Reg 18) and subsequently as stand alone residential site Exmo_23 (Reg 19) suitable for 12 dwellings. That site is currently the subject of an application for planning permission. The connectivity of the site will therefore be significantly improved and its isolation ended by the planned connections set out in draft Policy SD01 in relation to the designation of sites Lymp_07 and Exmo_23 including the use of the area immediately to the south as sports pitches and recreation grounds as stated in Policy SD01 - "There should also be safe off-street pedestrian and cycle access that provides for east-west movement through the area for existing and future users linking into adjacent areas such as Lympstone Manor and allocated site Exmo_23." The 2022 Inspector's findings with regard to isolation and unsafe access can no longer carry the same weight. The Nursery Garage site subject to the Certificate of Lawful Existing Use can, as acknowledged by the Inspector, be developed with low density housing without adversely affecting the Green Wedge. Furthermore the owner has the benefit of an additional parcel of open land to the east on which improvements to Biodiversity can be effected in order to achieve on-site BNG, and frontage land on Courtlands Lane between the entrance driveway and the southern boundary, falling outside the CLEUD red line. These areas together provide further potential by way of CIL or S.106 contributions for the landowner to assist in achieving the improved connectivity sought to enable development of site Lymp_07. This could, for example include part of a pedestrian route from Lymp_07 to Courtlands Lane and a footway and vehicle passing place on the western boundary.

Given these circumstances the site has been submitted for inclusion on the Council's register of Brownfield Land. It should therefore be regarded as a developable site, capable of providing five or more dwellings in the context of the development plan.

Conclusion

- The respondents object to the general approach to housing allocation in the Regulation 19. Consultation which does not meaningfully address the requirements of emerging Government Policy and approach to the delivery of housing.
- The Respondents object to the failure of the Regulation 19. version of the plan to give full and proper consideration to the deliverability of the projected housing land allocations therein in the context of the statutory requirement to provide BNG uplift in the context of development proposals.
- The respondents consider the LPAs approach should support and identify housing delivery on smaller brownfield sites including Nursery Garage which are demonstrably deliverable, sustainable, accessible and ready for development, as part of their Housing Land Identification.

Full name: Sam Thorneywork

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It is too large and not needed for the local area. There is masses of development in Exmouth already as well as Exeter which is leading to congestion on the roads, overstretching schools and Gp's and putting more pressure on a sewage system that isn't fit for purpose. The river Exe resembles an open sewer twice a day. It goes against numerous policies such as policy OL05, PB01, HE02, OL01, Policy. AR01B and POLICY TR01. The government and councils are ruining East Devon with overdevelopment. It's a joke that these massive, ugly, mundane developments seem unstoppable yet for the small developer it's near impossible.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There are already enough houses in the local area. We shouldn't be influenced by national policy. Remove exmo 20 from the local plan

Full name: Cassie Thornton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. Exmo_20 would have significant adverse effects on St John in the Wilderness Grade I/* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO2. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. There is also poor public transport provision into Exeter and Exmouth, and a significant distance from the train stations. This is contrary to POLICY TR01. The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors,

dentist, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MR JOHN THOROGOOD

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

Full name: Mrs Nicola Tilley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo-20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to Paragraph 13.9. The Habitats Regulation assessment (30.1.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with Policy OL09 and Policy PB04. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of the Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with Policy AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. It is an unsustainable development. It would be isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to paragraph 11.6. It is too far, and too steep, from any town centre for people to use walking or cycling as their choice of transport. This is contrary to Policy TR01. The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its' most convenient and accessible town. The services and infrastructure of Budleigh (High St, Doctors, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Exmouth and Budleigh, contrary to Policy OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Greatly reduce the size of development Exmo_20. Do not access the site via Southern Wood. The impact of large scale construction traffic, and later the traffic caused by the new residents, would be detrimental to the current residents of Southern Wood, Meadow View Road and surrounding area. The roads are already congested and cannot sustain any additional traffic.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mrs Sue Trail

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land at St John's Exmo – 20 Proposing – A Social and community facilities B Around 700 new homes; and C At least 2 Hectares of employment land. Not sound – as not justified – ‘Our chosen strategies and policies should be based on solid evidence and should be the most appropriate when compared to other options we could have chosen.’ This site was considered at the meeting of the Strategic Planning Committee on 3 September 2024 with an officer recommendation not to allocate the site for development with the main issues being infrastructure problems due to securing suitable access, impact on the landscape, impact on the historic environment; particularly centred on the area surrounding the Church of St John's in the Wilderness and ecology reasons due to the substantial areas of woodland within the site. Members chose not to accept Officer advice and decided to allocate this site in favour of other sites which were deemed to be suitable for development as recommended by officers in the same report. It was evident from the meeting that Members had not visited the site to assess its suitability for development even though this is one of the largest, if not the largest site allocation in the plan apart from the new town allocations. It appeared from the meeting that the reason for choosing this site was purely political and not substantiated by sound planning reasons to justify development. Access to the site would be a major problem due to the existing road network both within and surrounding the site. The only feasible means of access to the site would be from the B3179 to the northeast of the site, however, this could not be considered to be sustainable given the location and its relationship with the town centre of Exmouth. The site adjoins the East Devon National Landscape and the East Devon Pebble Bed Heaths SSSI to the northeast and a substantial part of the site falls within the 400m exclusion zone for development adjacent to the SSSI. The site is on rising land to the northeast of Exmouth and its development would have a significant detrimental impact on the landscape of the area. The woodlands within the site, some of which are protected by Tree Preservation Orders provide habitat for considerable wildlife and the development of the site would result in

having a significant detrimental impact on the ecology of the area. The Historical core of area surrounding the Church of St John in the Wilderness would be severely impacted resulting in substantial harm to the designated heritage assets of the area. The development is likely to cause problems of flooding due to increased surface water run-off into the nearby Withy Brook. The allocation of employment land within the site appears to be completely ad hoc in terms of its relationship to existing employment sites and appears to have been included as an afterthought to assist with meeting target allocations. Land for employment uses should be directed to the expansion of existing employment sites in Exmouth; for example, there is available land in the vicinity of the existing business park at Liverton. The Foreword to the Plan states that ‘East Devon is an Outstanding Place’, however, there is a total disregard to that statement in considering this site for development, as it would result in destroying a beautiful part of the East Devon countryside. Proposing this site for development is not sound, as it is clearly not the most appropriate site for development when compared to other options which could have been chosen. The site is not appropriate for development at all and to include the allocation of this site as one of the largest sites for development in East Devon has to be seen a total disregard for the significant qualities of the area and how this area contributes to making East Devon an outstanding place.

Full name: Siobhan Trapnell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Peter Trudgill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient accessible town, with their amenities the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 for housing allocation should be selected. One deemed suitable, achievable & available in the HELAA. Exmo_20 would cause harm to adjacent pebblebed heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of local plan and not in accordance with the mitigation strategy.

Exmo_20 would cause harm to heritage assets, like St John in the Wilderness grade II listed church and churchyard, drastically altering the attractive rural setting which currently exists - contrary to POLICY HE02 Contrary to POLICY OL01, tranquility, wildness and dark skies would be destroyed and adjacent designated wildlife sites would be detrimentally affected. Exmo_20 development would be in conflict with Strategic Nature Area 368, fragmented and isolating habitats & destroy wildlife corridors, contrary to paragraph 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9 Exmo_20 also in conflict with POLICY OL09 and POLICY PB04 as the habitats regulations assessment (30.1.25) states that there is "currently not sufficient certainty to rule out adverse affects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test Development of Exmo_20 on heavy clay subsoil, with ineffective soakaway would

exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. The isolated location is unsustainable development so people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (& too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

In conclusion - that stretch of road across the common between Exmouth and Budleigh is crucial to maintain the rural attractiveness, existing habitats and wildlife, the nearby local businesses and reservoir in this AONB.

Until the sewerage, facilities and infrastructure is in place, no proposal of this size should be considered.

The sewerage system cannot cope as it is.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rachel Trudgill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient accessible town, with their amenities the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 for housing allocation should be selected. One deemed suitable, achievable & available in the HELAA. Exmo_20 would cause harm to adjacent pebblebed heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of local plan and not in accordance with the mitigation strategy.

Exmo_20 would cause harm to heritage assets, like St John in the Wilderness grade II listed church and churchyard, drastically altering the attractive rural setting which currently exists - contrary to POLICY HE02 Contrary to POLICY OL01, tranquility, wildness and dark skies would be destroyed and adjacent designated wildlife sites would be detrimentally affected. Exmo_20 development would be in conflict with Strategic Nature Area 368, fragmented and isolating habitats & destroy wildlife corridors, contrary to paragraph 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9 Exmo_20 also in conflict with POLICY OL09 and POLICY PB04 as the habitats regulations assessment (30.1.25) states that there is "currently not sufficient certainty to rule out adverse affects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test Development of Exmo_20 on heavy clay subsoil, with ineffective soakaway would

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In conclusion - that stretch of road across the common between Exmouth and Budleigh is crucial to maintain the rural attractiveness, existing habitats and wildlife, the nearby local businesses and reservoir in this AONB.

Until the sewerage, facilities and infrastructure is in place, no proposal of this size should be considered.

Given the current sewage issues affecting Exmouth and Budleigh, this proposal is madness

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rachel Trudgill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient accessible town, with their amenities the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 for housing allocation should be selected. One deemed suitable, achievable & available in the HELAA. Exmo_20 would cause harm to adjacent pebblebed heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of local plan and not in accordance with the mitigation strategy.

Exmo_20 would cause harm to heritage assets, like St John in the Wilderness grade II listed church and churchyard, drastically altering the attractive rural setting which currently exists - contrary to POLICY HE02 Contrary to POLICY OL01, tranquility, wildness and dark skies would be destroyed and adjacent designated wildlife sites would be detrimentally affected. Exmo_20 development would be in conflict with Strategic Nature Area 368, fragmented and isolating habitats & destroy wildlife corridors, contrary to paragraph 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9 Exmo_20 also in conflict with POLICY OL09 and POLICY PB04 as the habitats regulations assessment (30.1.25) states that there is "currently not sufficient certainty to rule out adverse affects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test Development of Exmo_20 on heavy clay subsoil, with ineffective soakaway would

exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. The isolated location is unsustainable development so people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (& too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

In conclusion - that stretch of road across the common between Exmouth and Budleigh is crucial to maintain the rural attractiveness, existing habitats and wildlife, the nearby local businesses and reservoir in this AONB.

Until the sewerage, facilities and infrastructure is in place, no proposal of this size should be considered.

Given the current sewage issues in Exmouth and Budleigh, this proposal is madness.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rachel Trudgill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient accessible town, with their amenities the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 for housing allocation should be selected. One deemed suitable, achievable & available in the HELAA. Exmo_20 would cause harm to adjacent pebblebed heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of local plan and not in accordance with the mitigation strategy.

Exmo_20 would cause harm to heritage assets, like St John in the Wilderness grade II listed church and churchyard, drastically altering the attractive rural setting which currently exists - contrary to POLICY HE02 Contrary to POLICY OL01, tranquility, wildness and dark skies would be destroyed and adjacent designated wildlife sites would be detrimentally affected. Exmo_20 development would be in conflict with Strategic Nature Area 368, fragmented and isolating habitats & destroy wildlife corridors, contrary to paragraph 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9 Exmo_20 also in conflict with POLICY OL09 and POLICY PB04 as the habitats regulations assessment (30.1.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test Development of Exmo_20 on heavy clay subsoil, with ineffective soakaway would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with Paragraph 11.2. The isolated location is unsustainable development so people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (& too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

In conclusion - that stretch of road across the common between Exmouth and Budleigh is crucial to maintain the rural attractiveness, existing habitats and wildlife, the nearby local businesses and reservoir in this AONB.

Until the sewerage, facilities and infrastructure is in place, no proposal of this size should be considered.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Glenn Tucker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_08 and Exmo_16 are greenfield sites and a haven for wildlife and should not be developed. Additionally, the local infrastructure (drains, sewers, roads etc) is unable to support additional homes in this part of Exmouth. Traffic at Littleham Cross, in particular, is already chaotic (since Plumb Park was developed) and the South West Water sewage problems in Exmouth (Maer Lane) are well documented.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Caroline Tulett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The housing development etc proposed at Exmo_20 could and should be located somewhere else where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 as proposed is contrary to the Policy PB01 of the local plan and not in accordance with the mitigation strategy. The peacefulness, “wildness and dark skies” of the countryside would be ruined which is against POLICY OL01. Wildlife is crucial and this development would split wildlife corridors and isolate habitats contrary to PARAGRAPH 13.23. Old trees and hedgerows cannot be replaced and it would be contrast to PARAGRAPH 13.9. The habitats regulation assessment from Jan 25 confirms that there may be adverse effects to air quality. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. There would be a flooding risk in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and make traffic congestion worse as it is isolated and further than 800m to existing services which are already busy such as GP and dentist. The main way of getting to Exmo_20 is much closer to Budleigh Salterton than Exmouth making it the town of choice for new residents there. The services wouldn’t cope but also Budleigh and Exmouth would effectively coalesce, contrary to POLICY OL05 of the local plan. Exmo_20 is contrary to policy in so many areas.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20

from the local plan to ensure services, wildlife, traffic, air quality and the Pebblebed Heaths are protected.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sarah Turl

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: “Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

"The proposed housing allocations in Exmouth ... A town currently with insufficient sewerage infrastructure, demonstrably broken sewage network and demonstrably under capacity of the sewage treatment facility so without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan."

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The policy does not take into account the already acknowledge failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

Full name: Dr Robert Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I would like to voice my strong objection to these proposed developments which would be built in a rural area on productive farmland and adjacent to the historic settlement of St John's in the Wilderness

> Exmouth is already one of the largest towns in Devon and SWW, as we know from the many news reports are finding it impossible to prevent large and regular raw sewage spills into the sea around Exmouth and Budleigh Salterton.

> Further significant development will only make that worse meaning that the local coastline and sea, one of the big attractions for tourists visiting this area and providing an essential income, will become unusable. Fishing and shellfish collection both commercial and leisure based will inevitably be severely impacted without mentioning the health impacts.

> The local infrastructure in Budleigh which will be the closest town to the development, is not sufficiently developed to cope with this large increase in population and will be overwhelmed. There is no major road between Exmouth or Budleigh and the M5. The B3179 has already become dangerously busy with large articulated trucks inappropriately using it to avoid the building congestion on the A376. These 2 roads were never intended to cope with the already massive traffic flow which will only increase with this proposed development.

> Until very recently this land had two protections to prevent building: National Landscape and Coastal Preservation Area.

> EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it.

> If house building and light industry on Exmo_17 were allowed, it would take away part of the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. > > Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. > > A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. > I understand the need for increased housing but these developments are ill thought through and in the wrong place.

> Any further housing in Devon should be built on brownfield sites with preplanned and well developed new infrastructure to cope with the demands of the additional population.

Full name: Mary Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Chapter 5, Development in the Towns and Villages" POLICY SD01 and SD10
(development proposals off Meeting Lane, Lympstone.

- I do not believe this policy is sound. The infrastructure does not exist to support these developments and they risk damaging important wildlife habitat (particularly for bats) and negatively impacting flood risk due to run off from increased hardstanding.

GH/ED/72a and GH/ED/73 should be located in a different site. This site sits within the coastal protection area and is also adjacent to the pebblebed heath. The little cation of these sites would cause fragmentation to and the isolation of habitats. Wildlife corridors are an important element for wildlife and their destruction is contrary to paragraph 13.23 of the local plan. Wildlife corridors around these sites offer important routes for wildlife to travel between the Exe estuary at Lympstone up to the pebblebed heath and the common. They are irreplaceable habitats containing veteran trees and mature, species rich hedgerows across the site contrary to paragraph 13.9.

Both sites are upstream of the world renowned RAMSAR Exe estuary mudflats which would result in the loss of filtration in an area which regularly floods. Damaging run-off would then flow from these sites down into the mudflats and this would be destructive to this world renowned RAMSAR habitat. This is in conflict with policy AR01B.

The allocation of both these sites in the local plan is contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe RAMSAR area around the village of Lypstone is visited by tourists and ornithologists from all over the world and it is vitally important that they are protected longterm.

Congestion of the already overused A376 would be increased by the additional traffic.

Lypstone is a small village and although it has a train station the majority of journeys to work, school and weekly shop are done by road. The increase in traffic congestion is in conflict with paragraph 11.2.

This development is unsustainable, and residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6.

Lypstone has only one direction out by road, via the A376. The access lanes already flood regularly and can make the village inaccessible. These sites in these locations will exacerbate these flooding and access issues.

The decision to include 72a is controversial since it is far from the village of Woodbury despite being in Woodbury parish. In practice residents would need to cross the A376 and navigate several miles of lanes to reach Woodbury services, so residents would inevitably put additional pressure on already full services and infrastructure such as school, doctor, parking, flooding etc. This is against policy OL05.

Site LYMP_07

LYMP_07 is upstream of Lypstone on the main rainwater catchment area of Wotton Brook. The subsoil here is of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Lypstone Village. This is in conflict with POLICY ARO1B.

LYMP_07 has been assigned in the local plan in contravention of strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe area around the village of Lympstone is a world renowned RAMSAR site on the Exe estuary which is visited by tourists and ornithologists from all over the world.

To develop LYMP_07 would isolate and fragment habitats, destroying vital wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. These areas include veteran trees and species rich hedgerows and runs contrary to PARAGRAPH 13.9.

LYMP_07 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development which would require residents to travel. People would need to travel far further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too steep and too far from a town centre for people to allow most people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The use of Exmouth facilities and services would lead to coalescence of Lympstone and Exmouth, contrary to POLICY OL05 of the local Plan. The Village of Lympstone and town of Exmouth have fought hard over decades to protect both settlements from coalescence.

Chapter ‘ Our outstanding landscape’

The following sites LYMP_07, GH/ED/72a and GH/ED/73 have been assigned in the local plan contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe estuary is an important ecological site with rare and protected species.

Full name: John Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Access to Exmo-20 is much closer to Budleigh Salterton . Thus all local services there would be the preferred choice. This undermines the settlement hierarchy contrary to policy OL05 of the local plan. An alternative site to Exmo-20 should be found which doesn't impact Pebblebed Heaths This site is contrary to HELAA,the site selection methodology and policy PB01. So not in accordance with Mitigation Hierarchy to select avoidance over mitigation.

Exmo 20 would impact St John in the Wilderness church and the rural nature of it's services

Exmo -20 would affect the tranquility, wildness and dark skies again contrary to OL01.

Wildlife corridors would be destroyed contrary to the Local Plan

The heavy clay subsoil with ineffective soak aways would exacerbate flood risk through Exmouth.

Increased car traffic which inevitable in view of distance to amenities, steep inclines meaning no walking or cycling would be likely would cause congestion and pollution- contrary to Policy TR01.

Sewage treatment would impact an already over stressed system

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To prevent over use of B3179, access elsewhere Greatly reduce the size of the scheme. If more people need to move to the area, move to a plan providing transport, schools, shops and hospitality, doctors and all necessary services.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a member of the society impacted by this plan I wish to have a say in the outcome of the planning process.

Full name: Catherine Mary Turner. (aka Kate Somerby)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High St, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Catherine Mary Turner. (aka Kate Somerby)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SS1/SAC/SPA/NNR) due to Exmo-20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a resident of Budleigh Salterton, and Chair of Budleigh Music Festival I have an interest in any future developments that will affect the reputation and accessibility of this volunteer led initiative, as well as an interest in protecting the local environment for all members of our community.

Full name: Mark Vinnicombe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

We regularly use the cycle path and also walk our dogs. It truly is a beautiful part of Exmouth and we really need to save it before it's too late.

Full name: Lindsey Waddell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: JIM WADDELL

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

When critical infrastructure such as sewerage disposal, as managed by SWW, is in utter chaos with no coherent timely plan for necessary improvement, how can any large increase in inputs that such development would cause to the present system be seriously contemplated?

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Alan Wake

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). the development of Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with mitigation strategy.

Exmo_20 would blight the "tranquility,wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats, destroy wildlife corridors contrary to PARAGRAPH 13.23 of the Local Plan. Also, contrary to PARAGRAPH 13.9 it would damage irreplaceable habitats, aged trees and hedgerows abundant with many species across the site, contrary to PARAGRAPH 13.9.

The Habitat regulations assessment(30.01,25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and PB004.

Contrary to POLICY HE02 Exmo_20 would have significant adverse effects on St.John in the Wilderness GRADE11* listed church and churchyard, altering dramatically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is sited upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This conflicts with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is an untenable development. It is an extremely isolated development and residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. it is too far (and too steep) from any town centre for residents to use either walking or cycling as transport of choice. This is contrary to POLICY TR01.

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh Salterton the most conveniently accessible town. The services and infrastructure of Budleigh, High Street, Doctor's, School etc would be the obvious choice for residents of Exmo_20. the Doctors and school are just about coping as is without the addition of residents of an additional 700 houses. This as an outcome would lead to an amalgamation of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan. Reduce the size of EXmo_20. Do not access the site via B3179. Do not access site via Southern Wood. Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rosie Walker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am concerned that Exmo_20 will destroy “tranquility, wildness, and dark skies” of the countryside, contrary to policy OL01. It will also destroy wildlife corridors, contrary to paragraph 13.23 of the Local Plan. This development would increase the need for car travel and likely increase traffic congestion due to the need of residents to travel a considerable distance (more than 800m) to key services and facilities in Exmouth or Budleigh Salterton. This is contrary to paragraph 11.6. The development is incompatible with sustainable transport (eg walking or cycling) as it is located too far, and on a route that is too steep. This is contrary to policy TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Tim Wallace

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access through Southern Wood. Consted narrow roads can not support additional through traffic. Parking is already an issue and unsafe.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: MRS PAMELA WALLINDER

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should and could be built at an alternative location where there is no disruption to wildlife corridors and light pollution (paragraph 13.23 of the Local Plan). It would increase car usage as there is no nearby public transport. The B3179 road is not suitable for walking (no pavement) or cycling (too narrow) or for large vehicles. The development would put pressure on the Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the local plan. Local Services are already under pressure due to recent house building and people are moving into the area.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sarah Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Development of Exmo_20 on heavy clay subsoil with poor soakaway would result in an increase flood risk, where there is already one, in the downstream flood risk along Withycombe Brooke through Exmouth, already this is under additional stress due to climate changes. In addition, this is in conflict with Policy AR01B. Exmo_20 development would cause fragmentation and isolation of habitats while destroying the wildlife corridor, in contradiction to Paragraph 13.23 of the local plan. It will cause irreplaceable habitats to animals and veteran trees across the site, contrary to Paragraph 13.9 of the plans.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Building so far from the City, motorways and central train lines only causes more commuting and higher levels of stress to other roads and local villages. The local secondary school is already very full and as such children in the local area will need to relocate when having children and making informed decisions on their children's futures. What is Exmouth creating for the younger generation to stay? When is the future planning to ensure that the money of the families living in the new housing will enhance the local area? Doctors, Dentists, Colleges/uni courses need to be readily available, the future of the town and local area require families to stay and want to grow, while supporting small businesses and people - this will not happen when locals cannot park or access the required amenities to not just survive, but thrive. > Do not access the site via Southern Wood, this is detrimental to the locals who reside in this area. There is plenty safe space to access the site from Salterton Road or the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: So that local home owners who can see and understand the land can help to enhance the planning. On paper it might look sensible but locals can explain how the land reacts throughout seasons and time. Change is good, when considered in it's full entity, but the appropriate persons in addition to the specialists.

Full name: Brian Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: EXMO_20

The Pebblebed Heaths, which are of international nature conservation importance, lie close by and to the north of the site.

By virtue of the proposed development being within 400 metres of the East Devon Pebblebed Heaths, it is likely to lead to the deterioration of habitats and loss or disturbance of wildlife within the East Devon Pebblebed Heaths Site of Special Scientific Interest, East Devon Pebblebed Heaths Special Area of Conservation and East Devon Heaths Special Protection Area arising from the residential occupancy of the building and increased recreational use. These effects cannot be avoided or mitigated other than by avoiding residential development. As such the proposed development is contrary to Strategy 47 (Nature Conservation and Geology) of the Local Plan 2013-2031 and the Conservation of Habitats and Species Regulations 2010.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy

or paragraph. Please be as precise as possible.: Reduce size of EXMO_20 or remove it from the Local Plan. Do not access this reduced site from the B3179.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
EXMO_20

The Pebblebed Heaths, which are of international nature conservation importance, lie close by and to the north of the site.

I had assumed that sites within 400m of the Pebblebed Heaths SAC, i.e the northern section of EXMO_20, would be ruled out as being unsuitable in the HELAA, i.e in the East Devon Local Plan 2020-2040 – Site Selection Methodology (May 2022).

Therefore, by virtue of the proposed development being within 400 metres of the East Devon Pebblebed Heaths, it is likely to lead to the deterioration of habitats and loss or disturbance of wildlife within the East Devon Pebblebed Heaths Site of Special Scientific Interest, East Devon Pebblebed Heaths Special Area of Conservation and East Devon Heaths Special Protection Area arising from the residential occupancy of the building and increased recreational use. These effects cannot be avoided or mitigated other than by avoiding residential development. As such the proposed development is contrary to Strategy 47 (Nature Conservation and Geology) of the Local Plan 2013-2031 and the Conservation of Habitats and Species Regulations 2010.

Please see planning application 18/2445/FUL | Conversion of existing barn with extension, plus associated works for holiday use only, Ellergarth, Dalditch Lane, Budleigh Salterton, EX9 7AH, and associated Appeal documents. The Application was refused through the policy of not allowing new dwellings within a 400m protected zone of the Pebblebed Heaths. The Inspector appointed by the Secretary of State noted that this restriction was specifically on account of the impacts of domestic cats through bird predation. Consistency of Policy is required.

The proposal will lead to unmitigated harm to the protected sites. The National Planning Policy Framework, at paragraph 175 indicates that if significant harm to

biodiversity resulting from a development cannot be avoided or adequately mitigated, then planning permission should be refused.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce size of EXMO_20 or remove it from the Local Plan. Do not access this reduced site from the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that local views are considered.

Full name: Nicola Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmouth is a town with insufficient sewerage infrastructure, demonstrably broken sewage network and demonstrably under capacity of the sewage treatment facility so without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Remove Site Exmo_20 from the Local Plan. The policy does not take into account the already acknowledge failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth and Budleigh from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

Full name: Nicola Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

Full name: Nicola Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
INCREASED FLOOD RISK

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

Full name: Nicola Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

Exmo_20 would mean that hundreds of households would be using the already struggling water and sewerage infrastructure. SWW cannot cope with the management of current levels of sewerage in Exmouth and Budleigh Salterton and this extra demand could be catastrophic for the area in terms of the unregulated discharge of untreated sewerage into our rivers, seas and onto land. I cannot find anywhere in this over complicated process to state these infrastructure concerns. SWW are failing badly with the current population size, they will not cope with this size of development.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. It is unsustainable development. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

? Exmo_20 would undoubtedly destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the

Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We have serious concerns that the infrastructure we have in this part of rural Devon eg with regard to roads and and sewerage system capacity are already under pressure and causing real problems in the area. I would want to see the removal of Exmo_20 from the Local Plan, or at the least significantly reduce the size of Exmo_20.

Full name: Helen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: “Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. This includes the availability of medical facilities, school places and road links, which are currently at full capacity. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage. including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove or considerably reduce SD01 development until adequate sewage treatment and storm capacity expansion is in place.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmouth currently has an insufficient sewerage infrastructure, a demonstrably broken sewage network and under capacity of the sewage treatment facility . Without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01 Due to its location , Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is an unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. The B3179 is already very busy and the winding nature of the road with several turn offs already make it dangerous , particularly at night when bright LED headlamps can blind on-coming traffic. As a sole point of access the B3179 cannot support the extra volume of traffic that a development of 700 houses would inevitably create.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site EXMO 20 from the local plan . There are far too many houses allocated on this site for the local infrastructure in place. The site is too near the protected Pebble Bed Heaths and will have a major impact on wildlife and biodiversity . The B3179 will not cope with any more traffic .

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The projected allocation of 2311 new homes in Exmouth compared to a much lower allocation of 471 for Sidmouth and 839 homes for Honiton , which are similar sized towns seems out of proportion. I question the need for 4777

new homes in East Devon by 2042, which is an arbitrary target given by central Government without any justification. This figure totally outstrips the need for affordable housing for local young people on the start of the housing ladder. Past developments in East Devon, such as Cranbrook have proved that the majority of new housing is bought up by people from outside the area and is too expensive for people who are born and grew up in East Devon. Without accompanying investment in infrastructures such as roads, sewerage, schooling, medical provision, retail and opportunities for leisure within the areas being built on, an employment opportunities, extra housing just places an extra strain on all the existing resources. The National Policy Planning Framework outlines that : 20. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for: (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

(c) community facilities (such as health, education and cultural infrastructure); and

(d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation. This planning proposal for Exmouth has clearly not considered these issues before allocating areas for development and also plan on using Grade 1 agricultural land instead of brownfield sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This consultation document is unnecessarily difficult to answer and requires a computer which dis-enfranchises many in the community. It does not comply with the 2018 accessibility regulations for the public sector. The complex wording and demands for "precise" modifications and legal compliance assessments are completely unrealistic for the average resident, who will not have a background in planning law. The consultation form is designed to dissuade participation rather than engage the community, which is undemocratic.

Full name: Ian Wasson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo20 is on the busy B road linking Budleigh Salterton and Woodbury Common and would increase traffic here way out of the level designed for such a road. The site is also nearer Budleigh Salterton than Exmouth and as such residents are more likely to use overstretched facilities in Budleigh such as the doctors surgery and schools. The site is also huge and projects in an unrealistic way out of Exmouth. I fail to see why this expansion is required when there are also proposals for a second new own in East Devon and the expansion of Cranbrook has not yet been completed. The plans will ruin the appeal of this area of East Devon to visitors, and will just increase the level of traffic to Exeter, the main employment hub in the area.

The site would increase the need for car travel generally in conflict with paragraph 11.2 as it would not be possible to walk to local facilities either in Exmouth or Budleigh Salterton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo20 from the developing local plan, or reduce its size away from the Budleigh to Woodbury Common road, or remove access from the B3179 altogether. Or, revert to site Exmo 20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Bryony Watkins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Katie Watson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: David Watson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Melissa Watts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: David Henry Welsh

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo-20 is closer to Budleigh Salterton than Exmouth making the services and infrastructure of Budleigh the preferred choice for residents of Exmo-20 undermining the settlement hierarchy contrary to POLICY OL05 of the local plan. The isolated location of Exmo-20 is unsustainable development and would increase the need for car travel and increase travel congestion contrary to POLICY TR01. Exmo-20 would have a detrimental effect on adjacent designated wild life sites and destroy “tranquillity, wildness and dark skies contrary to POLICY OL01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: David Henry Welsh

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It is contrary to Policy OL05 of the Local Plan because the facilities in Budleigh Salterton are nearer than those in Exmouth and thus the ones the residents of Exmo20 would be more likely to use. It would thus coalesce Budleigh and Exmouth. Therefore an alternative site should be selected. The chosen site should avoid harming the adjacent Pebblebed Heaths which are at risk under the present proposals. (See Policy PB01). Local wildlife would also be at risk. Exmo 20 would endanger local heritage sites, in particular St John in the Wilderness church and churchyard. The church and churchyard are treasured and meaningful for local residents. Unsuitable change would be contrary to POLICY HE02. Wildlife and the tranquil atmosphere in the area would be threatened (contrary to POLICY OLO1) as would also local veteran trees and hedgerows. Similarly air quality is in all probability at risk. Exmo20 would also potentially increase flood risk along Withycombe Brook which would conflict with Policy AR01B. Inevitably there would be increased traffic movement as residents accessed essential services. It is very hard to imagine more than a very small minority choosing to walk or cycle. This conflicts with POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Ideally remove Exmo20 from the Local Plan. Failing that, addressing the size and access points would offer some improvement but not nearly enough to justify going ahead.

Full name: David Henry Welsh

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, which would likely make Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, conflicts with POLICY OL05 of the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Shirley Westall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Mr I White

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: GH/ED/72a and GH/ED/73 are situated within the coastal protection area and part of the Pebblebed Heath. These would fragment and isolate habitats and destroy wildlife corridors, contrary to paragraph 13.23. of the local plan. The wildlife corridors in these sites in particular take wildlife from the Exe estuary at Lymptone up to the Pebblebed Heath and Common. Development would be detrimental to irreplaceable habitats, veteran trees and species rich in hedgerows across the site contrary to paragraph 13.9. Both sites are upstream of the world renowned RAMSAR Exe estuary mudflats and the loss of infiltration in an area which regularly floods will then flow from these sites down into those mudflats destroying habitat. This is in conflict with policy AR01B.

Both sites have been assigned in the local plan contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas. The Exe area around the village of Lymptone has stunning views of the world renowned RAMSAR site on the Exe estuary. This area is visited by tourists and ornithologists from all over the world but EDDC have ignored the speeches by zoologists and environmental specialist and allowed these sites to be put forward even though they are in the CPA.

Both these sites would increase the need for car travel and increase congestion on the A376. Lymptone as a small village has been targeted for housing using the excuse that it has a railway station. In truth, the majority of journeys to work, school and weekly shop is done by car. The increase in traffic congestion is in conflict with paragraph 11.2. It is unsustainable development. People would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6.

Lympstone, being on the River Exe, only has one direction out and exclusively onto the A376. The access lanes already flood regularly making the village inaccessible. These sites in particular will exacerbate the flooding and access issues.

Site 72a is in Woodbury parish and the detriment it will bring to Lympstone village by putting pressure on already full services and infrastructure such as school, doctor, parking, flooding etc is against policy OL05 and even worse, Lympstone Parish Council and our EDDC councillors were banned from speaking at the strategic meeting for these sites.

LYMP_07 is upstream of Lympstone on the main rainwater catchment area of Wotton Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Lympstone Village. This is in conflict with Policy ARO1B.

LYMP_07 has been assigned in the local plan contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas. The Exe area around the village of Lympstone has stunning views of the world renowned RAMSAR site on the Exe estuary. This area is visited by tourists and ornithologists from all over the world but EDDC have ignored the speeches by zoologists and environmental specialist and allowed these sites to be put forward even though they are in the CPA.

Developing LYMP_07 would fragment and isolate habitats and destroy wildlife corridors, contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

LYMP_07 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. People would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The services and infrastructure of Exmouth (Supermarkets, High Street, Doctor's, school, beach etc) would be the obvious choice for residents of LYMP_07. This would

lead to coalescence of Lympstone and Exmouth , contrary to POLICY OL05 of the local Plan. The Village of Lympstone and town of Exmouth have fought hard over decades to protect both settlements from coalescence. This was communicated loudly to the EDDC strategic planning committee who chose to ignore this very important strategic plan of the two settlements.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As above

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As above. This consultation exercise is designed to be opaque and inaccessible, preventing citizens from making their views known. It is disgraceful.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As above.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: joannah whiteley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It

would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

? Revert to Exmo _20b as previously proposed,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sonny Alexander Wightman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

The main access point of Exmo_20 is significantly closer to BudleighSalterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in

conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Susan Williams

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth or Budleigh Salterton to allow building on Exmo_17.

Full name: Victoria Williams

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The most local town Budleigh Salterton does not have the infrastructure to cope with additional stress and will upset the settlements independence from Exmouth. The coalescence of the two towns is against POLICY OL05 of the local plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

Full name: Seann Sara Williams

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Seann Sara Williams

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site. The current proposed site will cause harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. It will destroy the tranquility, wildness and dark skies of the countryside, which is contrary to POLICY OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats regulations assessment (30.01.25) confirms that there is currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre

for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

?The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sylvia Wills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Main access point of Exmo-20 is significantly closer to Budleigh Salterton than Exmouth. The services and infrastructure of Budleigh (High St, Doctors, School etc) would be preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to Policy 0L05 of the Local Plan. Exmo_20 would harm the adjacent Pebblebeds Heaths. Is contrary to HELAA the site selection methodology & Policy PB01 & not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. Exmo_20 would have a detrimental effect on this open countryside site & adjacent designated wildlife sites, eliminating the "tranquility, wildness & dark skies" contrary to Policy 0L01. Exmo_20 would be in conflict with Strategic Nature Area 368, fragmenting isolating habitats & destroy wildlife corridors contrary to Para.13.23 & Para.13.9 of the Local Plan. The main site access proposed is opposite the SAC/SPA. Exmo_20 would increase car travel, congestion on an already busy B3179 road. This isolated location provides unsustainable development as residents would need to travel much further for existing key services and facilities contrary to Para. 11.6. It is too far from any town to use walking or cycling as transport contrary to Policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I wish to witness first hand how the proposal is dealt with

Full name: Beatrice Wilson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I am writing regarding the

This development could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

For these reasons, I strongly urge the Planning Committee to reject this proposal.

Full name: LAURA WILSON

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

? Revert to Exmo _20b as previously proposed,

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beatrice Wilson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

? Revert to Exmo _20b as previously proposed,

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Barry wilson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Lack of infrastructure Dangerous road

Full name: Andrew Wolstenholme

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

I also want to add, that the local sewerage system already cannot cope with the existing demand in this area & us locals have had to put up with a lot of disruption. Building over 400 new houses on the surrounding fields is only going to worsen the amount of run off & further increase demand on the system. We are fed up of these issues & don't deserve the inevitable future problems this build will bring us.

This council was elected to represent the best interests of the local community. This proposal goes against what the vast majority wants & would be damaging to the town & its treasured green spaces! We want a town that we can be proud of again & not become another over crowded, built up dirty embarrassment!

We have already had our fair share of new build developments, Maer Valley, Littleham hill, Pankhurst & Dinan Way. This council needs to stop now, enough is enough!

Full name: Jenna Wolstenholme

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Emmie Wood

Other party name (if relevant): budleigh riding school

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Belinda and John Wood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Green Field sites are not for building on, they are for Nature, which should have a 'seat', in It's own right, at the table of any planning meeting, as already happens in some other countries. There are many empty properties and 'brown field' sites, which can be used and many urban sites, which companies keep unused, for their own ends.

The issue of second home owners, who buy up the properties which would be homes relatively affordable for the youngsters, has started being addressed, with higher taxes, but more must be done.

There are architects around now, who have designed pre fab. homes which are eco-friendly and affordable for the single person and those starting out on the property ladder. It would be wonderful if EDDC were at the forefront of promoting these.

The main access point of Exm_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting

foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the “tranquility, wildness and dark skies”, which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsuitable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lotti Wood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lindy Woodage

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan Revert to Exmo_20b as previously proposed

Full name: Callum Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: to make our objections known

Full name: Kerri Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via Southern Wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Dougie Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: to make our objections known

Full name: Dougie Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: to remove Exmo_20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: so we are heard

Full name: Michael Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo _20 development should be located at another site because : It would cause harm to Pebblebed Heaths (SAC / SPA). It is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. It is contrary to POLICIES of the Local Plan PB01, 0L01,0L03, TR01, 0LO5 and also to paragraphs 13.23 and 13.9. It conflicts with POLICIES 0L09, PB04 and AR01B. It is also contrary to POLICIES HE02, TR01 and 0L05.

Exmo_ 20 would seriously overload the services and infrastructure of Budleigh Salterton and rapidly cause the coalescence of Budleigh and Exmouth which is directly contrary to POLICY 0L05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan completely or reduce the size of Exmo20 by 75%.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There is no consideration of traffic and the impact it will have on the surrounding area, just like Plumb Park in Exmouth. The need for housing overrides the impact.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Don't allow the new planning in Exmouth.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Lack of traffic infrastructure and lack of schools, primary and secondary schools.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Refuse permission.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Lack of consultation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Concerned residents.

Full name: John Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I

have been a resident of Exmouth for 54 years. I am writing to object to the development of the site known as Exmouth_20. This is an amalgamation of the larger and smaller site either side of St Johns Road, and clearly there are objections on applying to the size and location of the larger site bordering the 83179. My objections are the traffic onto this road and then through Woodbury or down St Johns Road, for access to the closest schools. Then there is the proximity to the SSI sites, the lack of pavement and the danger of the road. I used to live in Lympstone and note that the councillors there, and in Budleigh seem to have much firmer voices than the Exmouth ones. I believe they have held up the Dinan way link for far too long. I would like to concentrate my comments on the effects of developing the smaller western side of Exmouth20. My objections are on the following grounds: Water Springs in Great Wood. A culvert travels down the far side of the private lane accessing Bystock Stables that could become a road to the site or public footpath. We have noted an increasing amount of run off water during the last few years that flows down St Johns Road and also down the private lane. We would expect the development drainage and sewerage to be a challenge as it would flow into the site you have chosen to develop. The topography of the ground is of gullies and culverts and then the Dinan way is higher in height We believe that the land will be flooded as a result. Mains Water infrastructure Please do not accept any reports from South West Water to say that their mains water infrastructure is robust enough to take on the buildings. We have seen frequent repairs and attempts to repair where the above springs coincide with their pipes. We have also seen a repairs cause a burst main 30 metres above the repair and a stream run down the road in less than a week.

Wild life The woods that are bordering the western side of the site have been untouched for many years. It is particularly important to stress that the wet nature of the woods, including ponds and the dense scrub that will be affected, with animal pathways lost. It

is worth mentioning the bats, because we have the following experience of these. When developing some outbuildings to make Owls Cottage, 5 bat boxes were installed and the only bat resident of the buildings was removed by an expert. (This bat shunned the bat box he bought to place him in and flew off to the woods). Needless to say you will not be able to replace the tree habitats with enough bat boxes if our house had to install five. As evidence of the population, we now have over 30 bats living in the Owls Cottage's wooden cladding: they still shun the boxes. Trees On the western side of Exmout_20 , there is possibly the largest East Devon oak tree. I have not verified this but hope some survey will be commissioned to do so. Listed Buildings and sites of interest

1. St John's in the Wilderness and burial ground. Anyone who has visited this outstanding location will know its' name is apt because it is surrounded by country side. Building around this site will be a tragedy for an accessible and tranquil location that worshippers and mourners can access by bus and a short walk.
2. There is a location in the western side of the 20b site where underground bunkers were installed in world war two for covert operations.
3. I co -own of the listed property, known as St John's Lodge, listed buildings site ref: 1164796, under the name Higher Lodge. N.B. It is the second property in the county with rustic pole cladding, the other building being the Bear House at Killerton and should be considered with similar gravitas. St John's Lodge was developed, by the Bystock Court estate, to be a gardeners cottage and have a rural flavour added for the Courts owners when brought his visitors to the cricket pitch in the next field. This anecdote is not widely known but is why it has the rustic pole cladding. In summary, site Exmouth_20 (particularly the Western side of St Johns Road,) is unlikely to provide the low cost homes that our town desperately needs. The land topography and mitigation costs will be high. Trees and bat surveys should take place, water run-off from natural springs and the historic locations have to be preserved and enhanced, as they are in other East Devon locations. Finally, I am skeptical about the provision of infrastructure. I have seen the estates, on the outskirts of Exmouth. All the traffic has to funnel, to town or to Exeter and this will continue, even with the new link, which is now 30 years too late. We have noted that although large numbers of houses are supposed to be supported with schools, shops and surgeries, which seemed to be your main reason for

choosing this large site. The developers have often split up the sites and do not seem to be adding in anything for commercial units. This will be meaning even more traffic going through Woodbury and on to Exeter. The roads are single lane, the productivity and commercial aspects of the town are not considered. You have allowed the construction of many elderly care flats in our town but have not helped improve health care services with your planning policies. Please consider the whole impact of this development on

the surgeries and schools we have. Please consider low cost housing options. As a builder, I will be very surprised if any developer will see this site with lovely sea views as low cost.

Full name: Rebecca Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am a resident of Exmouth for 66 years. I am writing to object to the development of the site known as Exmouth_20. Exmouth_20 is an amalgamation of the larger and smaller site either side of St Johns Road, and clearly there are objections on applying to the size and location of the larger site bordering the B3179. My objections to the larger site are as spoken in your meeting, the traffic onto this road and then funneling through Woodbury or squeezing down St Johns Road, for access to the closest schools. (Unsound in relation to policy TR01) Then there is the proximity to the SSI sites, (unsound SAC/SPA/SSSI) and the dangerous nature of the road. All these objections were raised at your last meeting but I note that the Lympstone councillors, who maneuvered for this site, were not there to hear these raised. (unsound based on (HELLA stage 2 regulation consultations). I was glad to see that although developers of the site think that cycling is going to take place, councillors realized this was a ridiculous argument but sadly this false claim had no impact on the choices the Strategic Planning committee made in preferring this site to others. This was unsound based on TR01. I would like to concentrate my comments on the effects of developing the smaller western side of Exmouth_20 My objections are on the following grounds: Water Springs in Great Wood we know above our property. A culvert travels down the far side of the private lane accessing Bystock Stables that could become a road to the site or public footpath. We have noted an increasing amount of run off water during the last few years that flows down St Johns Road and also down the private lane. We would expect the development drainage and sewerage to be a challenge as it would flow into the site you have chosen to develop. Unsound on the basis of AR01(B)

The topography of the ground is of gullies and culverts and then the Dinan way is higher in height We believe that the land will be flooded as a result. AR01(B) Mains Water infrastructure Please do not accept any reports from South West Water to say that their

mains water infrastructure is robust enough to take on the buildings. We have seen frequent repairs and attempts to repair where the above springs coincide with their pipes. We have also seen a repairs cause a burst main 30 metres above the repair and a stream run down the road less than a week later. I do not trust South West Water to report correctly as they have failed to do this with other local developments. Wild life The woods that are bordering the western side of the site have been untouched for many years. It is particularly important to stress that the wet nature of the woods, including ponds and the dense scrub that will be affected and wild animal pathways lost. It is worth mentioning the bats, because we have the following experience of these. When developing some outbuildings to make Owls Cottage, 5 bat boxes were installed and the only bat resident of the buildings was removed by an expert. (This bat shunned the bat box he bought to place him in and flew off to the woods). Needless to say you will not be able to replace the tree habitats with enough bat boxes if our house had to install five. As evidence of the population, we now have over 30 bats living in the Owls Cottage's wooden cladding: they still shun the boxes. Although this is personal evidence,, I would like you to consider how you could mitigate for the loss of the habitat, which clearly will not be cheap Trees Exmoputh_20 west of St Johns road, there is possibly the largest East Devon oak tree. I have not verified this but hope some survey will be commissioned to do so. Listed Buildings and sites of interest

1. St John's in the Wilderness and burial ground. Anyone who has visited this outstanding location will know its' name is apt because it is surrounded by country side. Building around this site will be a tragedy for an accessible and tranquil location that worshippers and mourners can access by bus and a short walk.
2. There is a location in the western side of the 20b site where underground bunkers were installed in world war two for covert operations. This is not well known
3. There is a historic gateway and door in the road that would have given access across the fields to Bystock court to attend the church services.

4. I co -own of the listed property, known as St John's Lodge, listed buildings site ref: 1164796, under the name Higher Lodge. It is the second property in the county with rustic pole cladding, the other building being the Bear House at Killerton and should be considered with similar gravitas. St John's Lodge was developed, by the Bystock Court estate, to be a gardener's cottage and have a rural flavour added for the Courts owners when brought his visitors to the cricket pitch in the next field. This anecdote is not widely known but is why it has the rustic pole cladding. I do not think the building will be impacted at present, but I am including it because I know the National Trust , were able to shift the new link road from A la Ronde, but we, the local residents have no voice in

such issues. Where is the democracy if only the large organizations are heard.? In summary site Exmouth_20 is unlikely to provide the low cost homes that our town desperately needs. The land topography and mitigation costs will be high. Trees and bat surveys should take place and it should be looked at seriously because of the water run-off from natural springs and the historic locations have to be preserved and enhanced, as they are in other East Devon locations, on the western side. Finally, I am skeptical about the provision of infrastructure. I have seen all the estates, on the outskirts of Exmouth, built during my lifetime. All the traffic has to funnel, to town or to Exeter and this will continue, even with the new link, which is now 30 years too late. We have noted that although large numbers of houses are supposed to be supported with schools, shops and surgeries(OL05), which seemed to be your main reason for choosing this site, the developers have often split up the sites and do not seem to be adding in anything for commercial units. I note that this has occurred on the Gulliford Farm site where a supermarket was supposed to go, there now seems to be a planning application for 38 more houses. I do not believe that any more large developments should take place without the addition of a dual carriage way instead of the current roads in and out of the Exmouth funnel.

Full name: Nick Wood

Organisation (where relevant): Geotechnics

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo 20 would destroy the tranquility wildness and dark skies of the countryside which is contrary to policy OL01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmouth from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jennifer Young

Organisation (where relevant): Member of Ova

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo20 is closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient accessible town. The services and infrastructure of Budleigh (High Street, Doctors, school, etc) would be the preferred choice for residents of Exmo 20. This undermines the settlement hierarchy and would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY O L05

An alternative site to Exmo-20 for housing allocation should be selected, one of which was deemed available. It is achievable and suitable in the HELAA Exmo-20 would cause harm to the adjacent Pebblebed Heaths (SSSI/sAC/SPA/NNR) due to Exmo-20 being a supporting foraging habitat. Allocating Exmo-20 is contrary to HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo-20 would cause harm to heritage assets at Saxton /Norman/Medieval settlement, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

Exmo-20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites., eliminating the 'tranquility, wildness and dark skies' which is contrary to POLICY L91. I am particularly in favour of keeping dark skies.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from Local Plan

Full name: Ben Stephenson

Organisation (where relevant): Overgrown Removals

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ? An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heath (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan ? Reduce the size of Exmo_20 ? Do not access the site via the B3179 ? Do not access the site via Southern Wood ? Revert to Exmo_20b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Julia VAughan Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: What is proposed is a huge development and the infrastructure is just not there to support it - the sewage outflow in this area is dreadful, they have been adding chlorine to the water for weeks as obviously the treatment plants can't cope; schools and GP surgeries are under intense pressure already - where is the funding for extra services in these and others essential to support such a big community. And, the impact of traffic on the road will be dreadful, it is already full of potholes, it will become very congested. Is there enough jobs for everyone to do and will people be using cars a lot to get to places of work adding to the carbon pollution or will there be additional public bus services - if there aren't this is unsustainable. Overall I consider this plan totally unsustainable. It is all about the infrastructure and I don't see this considered. Also there is the risk to heritage assets in St John and is in conflict with the Strategic Nature Area 368, and Policies OL09 and PB04. Overall this is a very damaging plan.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: REmove Exmo_20 from the Local Plan or seriously reduce its size by a considerable amount. Find other ways of accessing the site

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: see Above

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I want to know that proper consideration is being given to these serious objections.

Full name: Martin Swallow

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accesible town. The services and infrastructure of Budleigh High St., Doctors, schools, beach etc would be the preferred choice for residents of Exmo_20 . This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth - contrary to POLICY OL05 of the local plan. Not supported by sufficient and necessary infrastructure. Current roads are in poor condition -extra users will worsen the situation. The current sewerage operation cannot adequately cope with current infrastructure. The principal applies to medical services, schools and shops. The development will detrimentally change the whole nature and character of the area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Amy Sweet

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heath (SAC/SPA).

Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy

- Exmo_20 would destroy the tranquillity, wildness and dark skies of the countryside, which is contrary to Policy OL01

- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to paragraph 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9

-The habitats regulations assessment (30.01.25) confirms that there is currently not sufficient certainty to rule out adverse effects in integrity in relations to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with policy OL09 and PB04

- Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to policy HE02

- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with policy AR01B

- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with paragraph 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities,

contrary to paragraph 11.6. It is too far and too steep from any town centre for people to use walking or cycling as their choice of transport, contrary to policy TR01

- The main access point for Exmo_20 is significantly closer to Budleigh than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh would be the obvious choice for residents of Exmo_20 and this would lead to coalescence of Budleigh and Exmouth, contrary to policy OL05 of the local plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Expo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Josephine Talbot

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO_20 is much closer to Budleigh Salterton than Exmouth. The access from this development would be more convenient for the residents to go to Budleigh Salterton. It would lead to coalescence of BS and Exmouth, contrary to POLICY 0L05 of the Local Plan. This is not a good idea as both towns are very different in type of population and atmosphere. The road from the proposed settlement is fast, difficult and awkward to get on and off from the location of the proposed settlement. You can see this easily from other turnoffs on that road. 2. EXMO_20 is also contrary to Policy PB01 and would cause harm to pebble beds etc. It would also have a harmful effect on adjacent designated sites contrary to Policy 0L01. It is also in conflict with Policy 0L09 and PB04 as the Habitats Regulations Assessment (30/01/25) re; air quality etc. EM_20 would also be in conflict with Strategic Nature area 368. and contrary to Para 13.23 of local plan. Cause harm to irreplaceable habitats - contrary to Para 13.9. Floodrisks - and conflicts Policy AR01B. Car travel and increased traffic congestion. Isolated location would mean people would need to travel by car as the walk or bike ride is too dangerous and difficult. It is contrary to Policy TR01 and in conflict with Para 11.2. I live in BS and am very aware of the parking and congestion BS town has.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan. You have enough development around this area as it stands and Cranebrook is still only half built. So why do you need this?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be fully informed of discussions regarding this and to make sure they are fair and just.

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of EXMO_20 is in conflict with policies SP01, TR01, TR03, and paragraphs 11.2, 11.6, 3.34 and 2.6 of the Local Plan. ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location. (POLICY SP01 proposes to promote the most significant levels of development at the principal centre of Exmouth).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Stephen Watts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There is no clear evidence of widening of the A376. Exmouth is a peninsula with one narrow road in and out and a further 2000 properties will mean another 2000 cars. There is a problem already with traffic and continued temporary traffic lights causing severe delays and slowing down business. Houses are needed but dramatically increasing housing in Exmouth without improving the road in and out of Exmouth is just increasing impact on residence and business.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: An additional lane or an alternative road to the A376.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See above

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There is no detail on infrastructure. Yes people will cycle as I do. But in winter and poor weather the cycle path is deserted and the roads are clogged.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Francis Raymond Whiteley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: “Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8

years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Currently the Waste Water Treatment Works at Maer Lane has capacity only to process dry weather situations, approximately 125 litres/second. The maximum throughput is around 240l/s. But the difference is required to clear the storage tanks (aka Balance Tanks) before the next rainfall. This clearly fails between 70 and 100 times a year as the Combined Sewer Overflows (CSOs) are activated. This breaks the current Environment Agency Permits. South West Water cannot therefore cope with the current load let alone a greater one. The number of activations will go up considerably as the differential between maximum throughput and dry flow rates reduces: It will not be linear. This Policy deliberately breaks the law and forces SWW to break the law as well.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: No development can be allowed until after the planned upgrades to the Waste Water Treatment Works is completed and is shown to be legally compliant,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The hearing needs to be shown explicitly why the sewage system is above maximum capacity.

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

PROPOSED ALLOCATION OF SITE EXMO_20

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 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 1,000 dwellings.

Natural England SSSI condition assessments have 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 underly 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.’

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.

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 enabling works appear 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.

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.: PROXIMITY TO DESIGNATED SITES

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

We strongly urge East Devon District Council not to include this proposed allocation within its Local Plan.

Full name: Jane Cordy

Organisation (where relevant): Libraries Unlimited, Budleigh Salterton Library

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it could cause less harm or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is an unsuitable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far, and too steep, from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh - High Street, Heath Centre, School , beach etc - would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Donna Crabtree

Organisation (where relevant): National Trust

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As set out in the National Trust's response to previous consultations, the National Trust owns important heritage assets and environmentally sensitive coastal land in and adjacent to Exmouth. National Trust is the owner of land at Lower Halsdon Farm (since 1996 when Lower Halsdon Farm and the surrounding land was generously bequeathed to the National Trust by farmer Stanley Long). The land owned by the National Trust includes land south from properties on Courtlands Lane and west from Exeter Road (directly south of the proposed allocations) down to Mean High Water on the Exe foreshore. This area is important in landscape terms on the estuary fringe and forms a significant part of the designated 'Coastal Preservation Area' on the eastern side of the Estuary between Lympstone and Exmouth. The National Trust therefore has an interest in protecting the character of the estuary fringe. The National Trust notes that proposed site allocations Lymp_07 (Land at Courtlands Cross) and Exmo_23 (Land to the South of Courtlands Lane), which lie between National Trust ownership at A la Ronde and at Lower Halsdon Farm, and were indicated at Reg 18 consultation on the policies maps as 'second choice' sites, are now proposed allocations in the Reg 19 Local Plan Consultation. The National Trust's objection in relation to housing development at the proposed allocation site Lymp_07 (and part thereof) has been made on several occasions as formal representations to historic planning applications at this site, and then at Reg 18 stage of the Local Plan when this site was a 'second choice' allocation. The National Trust wishes to confirm that it maintains its objection to this allocation, which is proposed to accommodate around 100 new homes and 0.4 hectares of employment land. Our response was previously set out in full as part of the Reg 18 consultation. The National Trust agrees with previous assessments made by East Devon District Council and the Planning Inspectorate when considering previous planning applications/appeals, that the site is unsuitable for housing due to the resulting significant landscape and visual harm to the estuary fringe. Housing development at Lymp_07 (Land at Courtlands Cross) and Exmo_23 (Land to the South of Courtlands Lane) would be at odds with the contribution that the National Trust land and

surrounding area makes to the unspoilt open qualities of the landscape in this location, which should be highly valued, and therefore the National Trust maintains its objection and requests that these are omitted from the final version of the Local Plan submitted for examination. Our previous response is attached again for the attention of East Devon District Council. As part of the National Trust objection to proposed allocation site Lymp_07, we confirmed that we would object to any removal/reduction of the Green Wedge and/or Coastal Preservation Area designation from this site or from site Exmo_23, or the surrounding area, from its current extent. And we maintain this objection also. This is set out in further detail under Policy OL05: Green Wedges and Strategic Policy OL03: Coastal Preservation Areas, below.

Full name: Helene Jessop

Organisation (where relevant): RSPB

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: In the RSPB's view, mitigation measures for those allocations closest to the designated heathlands (particularly Land at St John's (Exmo_20) (within 400m of Withycombe Raleigh Common, part of the designated SPA/SAC and RSPB nature reserve), Land at Marley Drive (Exmo_04) (within 50m of the designated heathlands, Land south of Littleham (Exmo_17), Land west of Hulham Road (Exmo_47), and Land at Coles Field Hulham Road (Lymp_14) and Courtland allocations) are less likely to be effective to avoid damaging impacts on the SPA/SAC heathlands (arising from potential loss of foraging habitat for nightjar, various urban effects on the designated heathland habitats and species, and addition nitrogen deposition from the increase in traffic emissions arising from new development. If these allocations progress, individual site assessment will be needed to determine first if any (those on the perimeter of existing built development) have existing value as functionally linked habitat for foraging nightjar that are a designated feature of the East Devon Heaths SPA and, if so, how adverse impacts on the SPA nightjar population through loss of identified foraging habitat will be avoided, and to determine if urban effects on the SAC and SPA sites can be satisfactorily mitigated, as highlighted in the HRA (p86, Footprint Ecology, 30/1/25). For example, the allocation land at St John's (Exmo_20) is adjacent (apart from only a dividing road) to the designated heathlands used by breeding nightjar. Nightjar have also been recorded breeding close to the designated heathlands but outside the SPA close to Exmouth, and nightjar will often forage off heathland. The RSPB is very concerned that the St John's allocation in particular will have damaging impacts on the designated heathland SAC/SPA (direct and indirect loss of potential foraging habitat to development or change of use of existing farmland to green infrastructure/public open space for the proposed development, increase in cat predation on ground nesting birds that are a designated feature of the heathland SPA, increase in damaging recreational use of the designated

heathland, including dogs off leads, if residents of the proposed new housing choose to use the designated heathland for daily recreational purposes. In the RSPB view, there is a significant risk that SANG provision and public open space for the proposed development will not be sufficient to prevent damaging increase in recreational usage of the designated heathlands arising from the new residential population. Whilst SD01 explicitly states (in reference to Land at St John's (Exmo_20)) that "new homes and other development that would result in unacceptable impacts will not be permitted within 400 meters of the Pebblebed Heaths", there is no means of preventing people or domestic cats from accessing the heathland and the risk of that happening is increased the closer new dwellings (which increase the local resident domestic cat population as well as new residents in need of land for daily recreational needs, including dog walking) are built to heathlands. The new national heathland breeding bird survey is taking place in 2025 and, when the results from that are published, they should be used to inform assessments prior to decision on any development. There is as yet no strategic to address the problem of traffic emissions and resultant increase in nitrogen deposition affecting heathland vegetation. In respect of Courtlands (eg Lymp_07) the RSPB is also concerned about impact on a priority bird that is not a designated feature of any protected site. Breeding curlew have been recorded on farmland in the area in recent years; this s41 farmland species of principal importance (red listed as a bird of conservation concern and specially protected under the Wildlife and Countryside Act 1981) currently has very few breeding territories in east Devon, and the Council should ensure no net loss to the population - where in situ retention and suitable management of habitat is not possible, compensatory habitat should be provided (such as mechanism has been successfully adopted elsewhere in Devon where this species occurs, including Teignbridge).

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.: In the RSPB's view, the Council should not progress any proposed allocation for new housing or development close to the designated heathlands until a strategy and effective measures to reduce traffic emissions and nitrogen deposition on the designated sites is in place. Additionally, ecological assessment should be informed by the results from the 2025 national heathland breeding bird survey currently in progress, and site survey to determine if those sites have value as functionally linked land used by foraging nightjar. All proposed sites around the designated heathlands should be subject to Appropriate Assessment re impacts on the designated heathland habitats and species and not progress if AA concludes that urban effects such as cat predation cannot be avoided or

satisfactorily mitigated and that mitigation measures (eg, SANG provision) for recreational impacts are unlikely to be effective for those proposed developments in very close proximity to the designated sites. The RSPB recommends this policy also references that development proposals at Courtlands Cross (and others with potentially suitable habitat for Cirl Buntings) should include ecological assessment for cirl bunting presence (as per Policy PB03 Protection of irreplaceable habitats and important features (re habitats supporting protected and notable species)).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The RSPB is very concerned at development allocations close to the designated heathlands for reasons of:

- lack of any strategy to address traffic emissions which will further add to the currently critical load of nitrogen deposition affecting the heathland vegetation
- the increasing risk of urban effects negatively affecting the heathland the closer new housing is to the heathland, and the less likely that SANG, public open space will be effective as mitigation given increased proximity of new housing to accessible heathland.

Full name: Alice Gater-Wildgust

Organisation (where relevant): Budleigh Salterton Town Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The largest development within the Local Plan is located the furthest from the designated Tier 1 Town it is allocated to, and adjacent to Budleigh Salterton, a Tier 3 town situated within a designated National Landscape. This policy is not legally compliant as it fails to satisfy a number of the remaining key tests, including those related to sustainability, environmental impact, and the adequacy of infrastructure provision. Furthermore, this site was previously rejected by East Devon District Council's Housing and Economic Land Availability Assessment (HELAA) as unsuitable, indicating that it does not meet the necessary criteria for development in terms of environmental considerations and suitability for housing.

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.: To mitigate the impact of the development on the National Landscape, it is necessary to reduce the proportion of the site at Exmo_20 that borders this protected area. The main access road to the site should be relocated away from the National Landscape and instead connect with more appropriate infrastructure, such as the newly planned Dinan Way road. Moreover, no site of this scale can fully comply with East Devon District Council's (EDDC) own policy requirements outlined in Chapter 6 'Mitigating Climate Change'. This is especially critical given the site's proximity to the National Landscape boundary and its location adjacent to the Pebblebed Heaths, making the heaths particularly vulnerable to environmental degradation.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: No consideration has been given to the main town affected by Exmo_20, Budleigh Salterton. This development fails to adequately address local priorities and needs, and must go beyond the scope outlined in the Local Plan. Furthermore this development directly contradicts Policy OL05 of the Local Plan which sets out to prevent development that would 'damage the individual character and identity of settlements'. Budleigh Salterton Town Council (BSTC) note that there are, quite rightly, concerns listed regarding the protection of the St. John in the Wilderness Church and its surrounding environment. Equal consideration must be given to the broader National Landscape, including the Pebblebed Heaths Special Site of Scientific Interest (SSSI), which requires comprehensive safeguarding. It is essential that East Devon District Council (EDDC) refrains from promoting land for development that has already been rejected by its own Housing and Economic Land Availability Assessment (HELAA), as this raises significant concerns regarding the suitability of the site for development. The impact of the proximity of such a large development on a discrete tier 3 town with limited infrastructure to accommodate the proportional increase in population and activity has not been taken into consideration. The inclusion of Exmo_20 in SD03 is in conflict with Policy PB01 of the Local Plan (Protection of internationally and nationally important wildlife site) and is not in accordance with the mitigation strategy and therefore renders SD03 unsound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site was explicitly ruled out of the development programme by East Devon District Council's (EDDC) own criteria under the Housing and Economic Land Availability Assessment (HELAA), which classified the site as 'available but unacceptable.' Given that experts in this field have already determined the site to be unsuitable for development based on established planning and environmental criteria, we believe that no modifications can render this aspect of the plan sound. The decision made by those with the relevant expertise should be respected, as it reflected a thorough assessment of the site's suitability for development

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Budleigh Salterton Town Council has not been directly consulted on this matter, despite being the most proximate town to the proposed main access point for the Exmo_20 development. Moreover, at the time we became aware that this site was to be included in the Local Plan, we were advised that the appropriate time to provide feedback to East Devon District Council (EDDC) would be during the formal consultation period for the plan. This lack of early consultation with the Town Council (representing the local community and residents) most affected by the development, undermines the effectiveness and transparency of the planning process

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.: BSTC would like to be present at any future hearing regarding this matter

Full name: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This policy says that Clyst Honiton could have a farm shop, not possible given the proposal to build over the farm land in the parish. This could be a real problem and would effectively prevent a community shop being set up to avoid isolation in a village surrounded by commercial and housing development.

Full name: Anne-Marie Bates, Clerk & RFO

Organisation (where relevant): Woodbury Parish Council

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Dear Planning Policy Team RE: Response to Regulation 19 Consultation on the New Local Plan Woodbury Parish Council response to the Regulation 19 Consultation is set out below along with an appendix referencing the relevant correspondence. Woodbury Parish Council would like to express our significant concerns in response to the Regulation 19 consultation on the new Local Plan. It is our firm belief that this consultation has not been conducted in a sound or satisfactory manner. Firstly, we find the consultation to have been inadequate in terms of meaningful engagement. The lack of substantial and proactive communication with Parish Councils is particularly disappointing. It is essential that East Devon District Council promotes meaningful discussions with Parish Councils, ensuring their voices and perspectives are heard and valued throughout the consultation process. We have encountered persistent issues with the timeliness and quality of the consultation process. The notice period provided for responses was unreasonably short and the time allocated to allow for formal meetings with our residents was insufficient. Many of our queries and concerns remain unanswered, leaving us feeling side-lined in this important decision-making process. On Friday, 23rd August 2024, at 5:08 PM, an email containing a letter from Cllr T. Olive was sent regarding the site selection decision-making process for the emerging Local Plan. The letter informed us that sites within our Parish would be discussed on Tuesday, 3rd September 2024. Due to the Bank Holiday weekend, the email was only read by the Clerk on Tuesday, 27th August 2024. This resulted in insufficient time (fewer than the required three clear days) to call a Parish Council meeting to address the matter appropriately. The consultation system used “Commonplace” had overly wordy content and a lack of user-friendliness. The tile system requires excessive navigation in and out of the tiles and large amounts of information has to be read to be able to proceed and then only specific questions are

given. This process is difficult to navigate and comprehend and no doubt puts off many users from responding. Adding to this each user had to register which again was not clear. This can be evidenced by the lack of responses received. Despite the Regulation 19 Consultation need for clarity, its presentation has made it challenging to address key aspects of the Local Plan such as general legal compliance, soundness, and the duty to co-operate. Moreover, the consultation has not provided adequate opportunities for stakeholders to express where development should be placed. This lack of consultation on location preferences has led to significant cumulative negative impacts on key infrastructure, services, and the environment. The significant development taking place in the Exmouth area, particularly to the north of Woodbury Parish, has highlighted a concerning lack of attention to infrastructure. Currently, this region in the district relies solely on the A376 and A3052 for its transportation needs, with Woodbury frequently being utilised as a diversionary route or shortcut. The challenges with sewage treatment in this area are well-documented, as the existing infrastructure frequently suffers from leaks and spills; substantial development is likely to place even greater strain on this already overburdened system. We are also disheartened that our landscape proposal, which was submitted as part of the process, has not received any acknowledgment or comment. This omission underscores the need for a more inclusive and attentive approach to consultation. Effective and genuine engagement with Parish Councils, timely communication, and sufficient opportunities for public input are essential for ensuring that the Local Plan reflects the needs and concerns of all communities in East Devon. We trust that our concerns will be taken seriously and look forward to receiving your response.

Appendix:

Correspondence:

1. Landscape Proposal 12.07.2022, 02.02.2023
 - Areas of green wedges that is needed to protect important National Landscapes
 - Coast Preservation Areas
 - Quiet lanes
 - Connectivity of communities by a green travel plan that links the Clyst Valley Regional Park, villages and the river Exe trail.

2. Additional Landscape Proposal 23.10.2024

- SANGS Areas
- Potential Country Park
- Nature corridors between the river Exe and Pebblebed Heath.

3. Consultation Response 23.01.2023

- Expressing the difficulty to navigate the “Commonplace” system
- District Councils opportunity to engage with Parish/Town Councils
- Highlighting our Landscape Proposal

4. Letter 28.05.2024

- Highlighting the lack of communication and consultation with EDDC and Parish/Town Councils
- Expectation and lack of due notice for Parish/ Town Councils to carry out consultations with their residents.

5. Letter 06.08.2024

- Parish Council’s site selection observations

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- Expressing our disappointment not being able to speak on potential sites on the parish boundary or has implications for our parish.

7. Email 03.09.2025

- Forwarding a potential development site in Woodbury Salterton; at least one other village (Upottery) requested development in their village to make it sustainable so the local school, pub, facilities were able to remain.
- Questioning the settlement hierarchy system that has been used inconsistently.

8. Letter 25.11.2024

- Deep concern with inadequate consultation and communication.
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Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

5. Development in the Towns and Villages

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land at St John's (Exmo_20) - we support that a masterplan is required for this site. However, the policy states that development which 'would result in unacceptable impacts will not be permitted within 400m of the Pebblebed Heaths'. There may be scope for confusion on the nature of impacts and what constitutes an unacceptable level of impact. This policy also refers to the delivery of SANGS. It would be clearer if the last sentence of the third paragraph of this policy stated: "The development will need to be supported by a new, developer provided, SANGs. This will be required to be delivered as part of the overall proposal scheme either on the allocation site or on nearby land. LNRS should be used to identify the best site and form of SANGS" The above applies to Exmo_17 also. There is no mention of the main river on site which is a key constraint. In our Reg 18 response, we mentioned the importance of providing buffer zones to watercourses across sites in Exmouth. We see the value of emphasising these as a key constraint in the policies.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_47: The relative rural isolation and tranquillity of grade I The Point in View chapel (associated with Grade I A La Ronde cottage further west), adjacent grade I Manse and surrounding grade II Registered Park and Garden, contribute to the significance of these assets as an ornamental farm and religious complex within a wider pastoral setting. Site Exmo_47 forms part of a green buffer between this group of assets and the residential development to the east, which helps to maintain these qualities. Development would therefore result in harm to the significance that these assets derive from their settings. Bearing in mind the limited contribution of the site to meeting East Devon's housing need, we question whether the proposed site allocation is justified and consistent with national policy. Furthermore, the proposed capacity of 15 dwellings appears too much to be supported by the site, when considering the need to restrict development to the southerly parts of the site (as specified by the policy) and provide access and gardens etc.

Exmo_20: Exmo_20 currently covers a very large area to the east and northeast of Exmouth. Much of this falls within the setting of the grade II* listed Church of St John the Wilderness and its churchyard. Development could result in considerable harm to the setting of this building, which the NPPF identifies as an asset of the highest significance (paragraph 206(b)). Development may also result in some harm to the setting of the nearby grade II listed buildings Withycombe Barton (a mid-late 19th Century house) and Higher Lodge (an early 19th Century Cottage or nee). The church and its grounds enjoy a scenic and tranquil setting and extensive views across the surrounding pastoral landscape. The churchyard is enclosed by rising land in a broad arc from north to south, with land to the east forming a highly sensitive part of the setting. We are therefore in general agreement with the policy statement that 'development will need to be

concentrated in the southern parts of the site’. However, restrictions on development in the setting of the church need to be more clearly defined. It appears that at modest densities it may be possible to accommodate the stated residential site capacity within less sensitive field parcels, entirely to the south of the church, between the water courses and areas of plantation woodland. If adding further employment development to the mix would result in harm, then we question whether it can be justified on this site bearing in mind the significant oversupply of employment land proposed by the plan as a whole. Finally, we are concerned by the proposal to bring a long access road from the B3179 to the north. This could itself result in significant harm to the setting, while opening up the area to future pressure for development and associated harm. It is unclear whether this is the sole reason for including a large swathe of land to the north and east of the church within the site? Alternative access to the south of the site should be explored. Consequently, in its current form we consider Exmo_20 fails the NPPF tests of soundness as it is unjustified and inconsistent with national policy, including paragraph NPPF 16(d) and policies in Chapter 16.

Exmo_17: Exmo_17 covers a large area located to the east of Littleham, with a cycle path (former railway) bisecting the landscape from east to west. Land to the south includes several fields and wooded water courses, which form a rural setting to the east of grade II* listed Parish Church of St Margaret and St Andrew within its churchyard – a heritage asset of the highest significance according to the NPPF. The southernmost field parcel adjacent to the church forms a particularly sensitive part of the setting. Any built development here has potential to result in considerable harm. This is acknowledged by the site selection report, which identifies a ‘major’ impact from development to the south, lessening to the north. Development may also result in some harm to the grade II lychgate and grade II Castle Cottages located further east. It appears that at modest densities it may be possible to accommodate both the stated residential site capacity and proposed employment uses (if justified) without developing the southern parcel of land adjacent to the church. Furthermore, while we welcome the requirement for a masterplan, the policy would benefit from clear provisions to protect views of and from the church. Consequently, in its current form we consider Exmo_20 fails the NPPF tests of soundness as it is unjustified and inconsistent with national policy including paragraph 16(d) and policies in Chapter 16. We note that the whole site falls within the East Devon National Landscape, and adjacent to the Coastal Preservation Area, the boundary of which is proposed to be redrawn to exclude this development site. These issues will require careful consideration.

Exmo_08 and Exmo_16: This proposed site allocation is on visually prominent sloping land and would urbanise, and result in significant harm to, the setting of grade II Green

Farmhouse in a way that would be difficult to mitigate owing to the topography. We therefore question whether this site is justified and consistent with national policy.

Exmo_50: We consider the reference to ‘skilful design’ unhelpful and suggest that this is replaced with more appropriate policy wording that considers character and responds to heritage policies in the NPPF.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Exmo_47: Hulham Road currently provides a strong eastern boundary to the remaining pastoral landscape around the group of heritage assets at A La Ronde. We recommend that this is maintained by removing Exmo_47 from the Plan. If the site is nevertheless to be considered for allocation, then the site capacity should be reconsidered on the basis of a more detailed understanding of potential impacts on the settings of heritage assets, and how this could be minimised and mitigated. This should accompany and inform a concept plan showing how any proposed development and mitigation would be located within the site. An associated policy would then need to incorporate these provisions, such as controls on development siting, height, materials and landscaping.

Exmo_20: Exmo_20 needs to be informed by a more detailed understanding of potential impacts on the settings of heritage assets, and how this could be minimised and mitigated. This should accompany and inform a concept masterplan showing how any proposed development and mitigation would be located within the site. Should this evidence demonstrate that the proposed development can be accommodated in less sensitive areas to the south, then the site boundary should be amended accordingly. If this is not possible then the range and quantum of proposed uses should be restricted to those which can be justified. Other options for site access should be explored. For example, could access be gained via a new road passing through Exmo_18 (Land east of Liverton Business Park) to the south? Overall, there needs to be greater clarity and assurance of the areas of the historic setting to be protected.

Exmo_17: Notwithstanding impacts on the National Landscape which will also require careful consideration, we request that the boundary of the site allocation is amended to remove the southern field parcel adjacent to the church along with all land south of

Littleham Brook. This would also allow the Coastal Preservation Area to be retained over this land, and would negate the need to bridge the brook, which may be costly. We suggest that the policy text is also adjusted as follows: “This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. The site is located in the East Devon National Landscape and particular sensitivity will need to be taken in respect of design and development approaches to minimise potential for adverse landscape impacts. Southerly parts of the site are particularly sensitive and considerable care will be needed in protecting to conserve and enhance the setting and ambience of St Margaret and St Andrews Church at Littleham, including any important views of or from the church and its churchyard.” Exmo_08 and Exmo_16: We recommend that the proposed allocation is removed from the plan. Should the site nevertheless be taken forward as a potential site allocation, a more detailed assessment would be needed of the potential impact of the scheme on the setting of Green Farmhouse. This should inform and accompany a concept plan to demonstrate whether the proposed site capacity can be achieved with a layout and landscaping to minimise and mitigate impacts.

Exmo_50: “This site forms an urban redevelopment opportunity that will accommodate a new police station as well as at least 20 new homes, with a design that responds sympathetically to the character and appearance of the conservation area, and conserves and enhances the settings of listed buildings around the site, Provided that it does not compromise the aims of this policy,, conserves and though with skilful design, noting the significance heritage interests around the site, a greater number of new homes will be actively encouraged.”

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal:

5. Development in the Towns and Villages

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Outside of the West End, Exmouth carries the largest proportion of new housing and employment land, with allocations totalling around 1,500 new dwellings and 6.7 ha of employment (Strategic Policy SD01). Proposed allocations predominantly focus development on the northern and eastern fringes of the town, remote from the rail station and direct bus links to Exeter. The focus for external commuting and retail trips will continue to be Exeter and employment in the West End. Consequently, it will be vital to deliver sustainable transport measures that improve linkages to existing transport facilities and offer new public transport opportunities, to reduce reliance on the private motor car and avoid unnecessary short distance journeys impacting on the SRN.

Full name: Neil Butler

Organisation (where relevant): Natural England

Proposal:

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1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(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.: Strategic Policy SD01: Exmouth and its development allocations (p76) Exmo_04a and Lymp_14 These sites contain and are surrounded by priority deciduous woodland habitats. The strategic policy does require that particular attention is paid to the onsite and surrounding biodiversity. However, Natural England recommends that the strategic policy could be improved by encouraging opportunities to establish connectivity between existing biodiversity assets. Exmo_17 The Site Selection Report states that “Development of the site could have significant adverse impacts if poorly undertaken. Any development would need to be of high quality and would need to be very carefully planned and sensitively implemented. “ Natural England agrees with this and reiterates that Section 245 Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA) now requires that authorities must now ‘seek to further the purpose’ (conserving and enhancing natural beauty) of protected landscapes. Exmo_20 The St John’s site (Exmo_20) was rejected as GH/ED/76 (same boundaries) at the Regulation 18 stage of the Local Plan, and it was not included in the May / June 2024 EDDC additional sites consultation. Therefore, even though this is a Regulation 19 consultation, this is the first time that Natural England has had opportunity to comment on this site. It is noted that the accompanying HRA suggests that the strategic policy contains sufficient mitigation to avoid an adverse effect from urban effects and residential impacts on the East Devon Heaths SAC/ SPA. The HRA also makes further recommendations for project level mitigation. Natural England agrees with the mitigation suggestions in the HRA. However, Natural England recommends that these measures should, as far as possible, be integrated into the strategic policy so that there is greater certainty that the mitigation will be delivered. We would also like to make the following points. The principle for keeping residential development outside of a 400m exclusion zone is established within

the Local Plan. Natural England welcomes the stipulation within the strategic policy SD01 that “built development will need to be concentrated in the southern parts of the site” with a 400m exclusion for residential and any development that has adverse impact. While this gives some degree of protection to the SAC / SPA the policy is not yet clear where employment uses would be located and understandably offers developers some latitude. Natural England therefore recommends that the policy should require a natural buffer in the northeast of the site along the B3179 road. This would perform multiple functions. It would conserve foraging areas for nightjars that inhabit the heaths, provide opportunity for BNG habitats and also maintain visual amenity adjacent to the East Devon National Landscape. Authorities must now ‘seek to further the purpose’ of protected landscapes as per LURA Act 2023. This is a clear opportunity to create permeable sites for nature networks and is in line with a wider green infrastructure approach. As such any access road from the northeast should be sensitively implemented. We would also recommend that any employment parking outside of the 400m zone should be restricted to users of the facilities (employees / customers) so that it does not become parking access for the SAC/SPA. The policy is not currently clear on whether the required SANG will be delivered on or offsite. If delivered onsite it is recommended that it should be as tightly integrated as possible to residential development in terms of location and access. Any onsite SANG should be buffered, fenced and have restricted on-wards access towards the SAC / SPA. The current EDDC SANG ratio provision policy of 8ha per 1000 residents is unlikely to translate to a site with sufficient space for a good-sized circular walk. Natural England would suggest adopting a higher ratio of 16ha per 1000 on this site, which would be in keeping with the HRA mitigation recommendation for ‘extensive’ SANGS provision. This, in tandem with high quality recreational features will help focus recreational pressure away from the East Devon Heaths SAC / SPA. If the above recommendations were applied to the site, with development in the south-west and a green buffer in the north-east, there may be opportunity to pull the settlement boundary away from the SAC / SPA and secure a green buffer area via S106 outside of it. This would appear to be clear, sound planning which more effectively communicates the planning restrictions approach around the East Devon Heaths SAC / SPA.

Full name: Jade Higham

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan, ? Do not access the site via Southern Wood,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

SD02

Full name: Jon Williams

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: We are fully supportive of this allocation and consider this site as fully suitable for development.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
We are fully supportive of this allocation and consider this site as fully suitable for development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: We are fully supportive of this allocation and consider this site as fully suitable for development.

Full name: Jon Williams

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: We are fully supportive of this allocation and consider this site as fully suitable for development.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
We are fully supportive of this allocation and consider this site as fully suitable for development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: We are fully supportive of this allocation and consider this site as fully suitable for development.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To clarify access requirements, DCC requests that the paragraph relating to the Axmi_22 allocation be amended to read: “This site is allocated for 100 dwellings. The site layout should make provision for a suitable access road to facilitate the development of site GH/ED/80 to the north and also be designed and built to a standard suitable for use and include land safeguarded at the Lyme Road intersection as part of a possible future relief road to link up to the A358, Chard Road, south of the Weycroft Bridge. Pedestrian/cycle access should be off Loup Court, with Public Rights of Way enhancements.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3(b). If no, please give details 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 County Council objects to allocation of four sites in Policy SD02 until further archaeological work is undertaken. Before sites Axmi_01a, Axmi_02, Axmi_08 and Axmi_09 at Axminster are allocated in Policy SD02, further archaeological work is required to understand the archaeological resource to determine the suitability of these sites for future development as they lie in proximity to the Roman fort (a scheduled monument) and settlement at Woodbury Farm, Axminster. The County Historic Environment Team is able to provide detailed advice on the extent and scope of the archaeological works required in order to determine the suitability of these sites for allocation for development

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Policy SD02 should identify the need for additional primary and secondary education infrastructure in Axminster and recognise this as a requirement to support the policy with the latter also supporting the wider aspirations of the plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Requested changes to Policy SD02 are shown below: “Expanded primary and secondary school provision in Axminster is required to support further development in Axminster and the wider aspirations of the plan. In addition, further provision for pupils with special educational needs and disabilities in Devon is required.”

Full name: Jo Wilkins

Organisation (where relevant): Somerset Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Proposed Growth at Axminster

3. It is noted that at least 1,409 dwellings and 4.8 ha of employment land is proposed at Axminster across a number of allocations (Policies SP03 and SD02). Axminster is located to the west of the border between Somerset and East Devon. The Primary Market Town of Chard is located within Somerset approximately 11 km east of Axminster. The former South Somerset District Council previously commented on the potential impact of additional traffic generation to employment areas at Chard because of planned growth at Axminster.

4. Submitted evidence base document East Devon Local Plan 2020 – 2042 Forecast Impact on the Strategic Road Network Honiton and Axminster, January 2025 has assessed the impact of proposed allocations on the junctions with the strategic road network (SRN) at Honiton and Axminster and has confirmed that there is capacity on the SRN for the proposed growth, this is welcomed. The allocation of employment land providing job opportunities along with housing should help to increase the self-containment of Axminster. No objections are raised.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Nutrient Neutrality – River Axe Special Area of Conservation

5. Somerset Council has been working with the Lead Authority, East Devon DC to address the issues relating to nutrient neutrality in the River Axe Special Area of Conservation. The East Devon Local Plan Key Supporting Document KSD – 02 Duty to

Co-operate Regulation 19 Consultation identifies that this matter is ongoing. Somerset Council confirm that they will continue to work with East Devon Council to address this issue and will contribute to any subsequent Statement of Common Ground. The inclusion of Strategic Policy PB04: Habitats Regulation Assessment, particularly the section on nutrient neutrality in the River Axe SAC catchment is welcomed.

Full name: Jemma Shorrock

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Persimmon Homes South West Limited

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

PHSW supports Strategic Policy SD02: Axminster and its development allocations, which includes land under their control.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

While PHSW supports the allocation of land east of Lyme Road (Axmi_22) for the delivery of 100 dwellings, to ensure the policy's soundness during examination, policy requirement to safeguard land for the relief road should be removed. We say this because:

- The Policy's requirement for a 'possible future relief road' lacks justification due to insufficient evidence of its necessity, feasibility or viability. A review of the current Regulation 19 consultation evidence base documents indicates that the relief road is unlikely to be delivered in the plan period.

- By definition, the term 'possible,' refers to something uncertain or improbable. Since the inclusion for the relief road from the 2013-2031 adopted Local Plan (adopted in

2016), nine years have passed without its delivery. Substantial evidence reveals that the road it is not viable and therefore undeliverable.

- The previous Regulation 18 Consultation Plan (August 2022) highlighted significant viability issues with the relief road. These concerns were also noted in EDDC's Strategic Planning Committee meetings.

- For the plan to be made sound, reconsidering and removing the safeguarding of the possible future relief road is essential, allowing for the timely delivery of the Axmi_22 allocation within the next 5 years.

Furthermore, it is important to consider the changes to the Key Diagram and Proposals Map relevant to Axminster. The Key Diagram designates Axminster as a Tier 2 settlement, marking it as a main centre planned to accommodate approximately 1,100 homes and 4ha of employment land. The online Draft LP Proposals Map identifies the Site as falling within the settlement boundary for Axminster. It also indicates a significantly reduced quantum of development on the eastern side of Axminster, with Site allocated for housing. The land to the north is allocated for both housing and employment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The reduction in the quantum of development compromises the ability to deliver the relief road originally envisioned for Axminster. The existing evidence base does not include any reassessment of the necessity of a relief road. The evidence base, therefore, lacks any evidence to demonstrate that, given the reduction in scale and quantum of development planned in the emerging Plan, the relief road is still essential to mitigate the impacts of the development.

Emerging Policy SD02 allocates the site for:

“Land east of Lyme Road (Axmi_22)

This site is allocated for 100 dwellings. The site layout should make provision for a suitable access road to facilitate the development of site GH/ED/80 to the north and also be built to a standard suitable for use as part of a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge.”

The current wording of emerging Policy SD01 is considered to be unjustified, and the inclusion of a requirement for the site to “be built to a standard suitable for use as part of a possible future relief road” is not suitable for the proposed scale of development currently identified for 100 homes.

There is a further reference of the ‘possible future relief road’ as part of allocation wording for land north of the site at Prestaller Farm, Beavor Lane (GH/ED/80a) which also forms apart of Strategic Policy SD02: Axminster. Specifically, that element of draft Policy SD02 states:

“Development must incorporate a site road that is of a standard and is appropriately located so that it, and through potential future extension of the road, can form a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge.”

In both instances, there is no further justification to support the inclusion of a possible future relief road.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure the further work required is undertaken to ensure the Local Plan is positively prepared, effective, justified and consistent with National Policy.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C G Fry & Son Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3(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.:

Re: Land east of Musbury Road (Axmi_02, Axmi_08 and Axmi_09) – for 438 dwellings and 1.6 hectares of employment land

Our client fully supports the allocation of the site for residential development but does not support the allocation for employment uses. There are also concerns about the justification for and feasibility of delivering a community hall.

SPATIAL STRATEGY AND DELIVERABILITY

Our client fully supports the identification of Axminster as a Main Centre able to support significant development. Axminster is a highly sustainable settlement with very good transport connections and a varied range of shops, services and facilities.

Strategic scale allocations at Axminster will better balance the historic skew of development towards the West End of the District as well as making up for the non-delivery of the former strategic allocation to the east of the town.

The proposed development site will both benefit from, and be able to further support, the extensive range of services and facilities in the town.

RESIDENTIAL

The three sites taken together as a single allocation is a logical extension to the town and the quantum of residential development identified in the policy is fully supported.

Allocating all three parcels as a single site will enable a comprehensive approach to forward planning future housing requirements delivering high quality homes to the south of Axminster.

The three parcels can function as a single entity, or can be delivered in phases, and are available, suitable and deliverable. Preliminary feasibility and design work confirms that this quantum can be accommodated on the site.

LAND QUALITY

Most of the site has remained as agricultural land and apart from minor and small-scale exceptions, is unlikely to have elevated levels of contamination.

FLOOD RISK AND DRAINAGE

The majority of the site is in Flood Zone 1 and any new development would be restricted to Flood Zone 1 at 'very low risk' of flooding from surface water. New development can be designed to safely convey any upstream flows through the site. In geological terms, soakaway drainage may be viable, to be confirmed by further assessment but if not the existing waterways on site would provide a natural outfall option.

ACCESS AND CONNECTION TO SERVICES AND FACILITIES

Vehicular access to the wider site can be provided from a number of locations. The site is accessible by foot and cycle to a range of shops, services and facilities in Axminster. There are a range of transport options to access Exeter, Taunton, Yeovil and Dorchester including train and local/strategic bus connections.

LANDSCAPE

Built development within the valleys and along the River Axe tributaries is an established pattern in Axminster and development on this site could follow this pattern.

Development on the higher slopes in the east will need to be carefully designed and planned. Measures will be required to soften the built edge and integrate development within the wider landscape and National Landscape setting. Field boundaries, hedgerows and hedgerow trees can be incorporated into the scheme to achieve this and help create stronger habitat links.

There is also an opportunity to improve the Public Right of Way network to create circular trails and connect to existing routes.

ECOLOGY

A full Phase 1 Habitat Assessment of the site has been undertaken. It is considered that there are not likely to be any insurmountable ecological challenges to a residential development of the scale and at the location proposed. Grassland habitats in particular are of local interest only.

There is potential for significant biodiversity enhancement in retained habitats to achieve required net gain and dovetail with the landscape mitigation.

HERITAGE

A Historic Desk Based Assessment (DBA) has been carried out confirming the likely presence of buried archaeological remains within the site. A programme of archaeological works will be carried out to understand the extent, nature and significance of the below ground archaeology within the allocation boundary. Once the results are available, appropriate mitigation can be designed into the scheme as required

The DBA also considered the potential for the development of the study site to affect the significance of the scheduled Roman fort and associated settlement, and Higher Wyke Farmhouse. The DBA concludes that the impact on the Roman fort would be addressed through the below ground archaeology assessment and mitigation. In terms of Higher Wyke Farmhouse the DBA concludes that any impact on its significance could be adequately addressed through detailed design measures.

UTILITIES

The site can achieve connections to existing utility networks, all of which have sufficient capacity to accommodate comprehensive development.

NUTRIENT NEUTRALITY

The Council is progressing a mitigation strategy for the River Axe catchment to address the impacts of the proposed allocations. Any future applications will make appropriate contributions to this to ensure the future development is nutrient neutral. The effect of surface water on the River Axe SAC can be mitigated through drainage design, using SuDS and other established techniques.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

COMMUNITY HALL

While the provision of appropriate community infrastructure is supported, the need for such facilities and the challenges of delivery and operation need to be understood.

Axminster benefits from a number of existing community facilities including Phippen Community Centre, Axminster Leisure Centre, Axminster Community Shed, Axminster Bradshaw Heritage Meeting Room and the main Town Council office located close to the centre of the town, so the need for an additional hall or meeting place is questioned. There is also no evidence provided regarding overall Community provision in East Devon, or specifically in Axminster, neither has there been any evidence regarding interest from local groups or the Town Council in taking on such a facility. Mandating the delivery of such facilities in such circumstances risks leaving part of the site undeveloped or worse a structure unused that is not suitable for other uses.

If this element is retained in the policy, there needs to be referenced to evidenced need and an identified operator and / or flexibility about how the community element can be provided.

Viability is also an issue in Axminster as acknowledged by the Tree Dragons Viability Assessment so the requirement for additional facilities needs to be properly evidenced and the viability implications understood.

HIGHWAYS MEASURES

The references in the policy to the provision of active travel links to the town centre and maximising opportunities for localised improvements/contributions to enhance sustainable travel modes is supported.

There is a concern however with the reference to the provision of off-carriageway bus stops on Musbury Road insofar as practicality of delivery. While land from the site could be used to deliver such provision for the southbound direction, there is no land available on the other side of the road to provide an off-carriageway bus stop for the northbound direction. We note the policy only requires this to be explored, but it should not reference something which is known to not be deliverable.

Additionally current highway guidance “Buses in Urban Developments” published in 2018 by the CIHT on providing infrastructure for buses encourages the provision of on-carriageway bus stops to prioritise bus movements and make it easier for buses to pull out into traffic flow. As such specifically requiring the provision of off-carriageway bus stops is not consistent with current best practice and one suggestion might be to drop the off-carriageway requirements and just refer to bus stops. It would then be for the highway authority to determine the appropriate arrangement through the planning application process.

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.: Suggested revised policy text:

This land is proposed for 438 dwellings. This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented.

The allocation will need to consider active travel links to the town centre and railway station, and the masterplan should address the landscape and heritage sensitivities of the site.

Highways access shall be taken from the A358 Musbury Road. The masterplan shall take full account of archaeological survey work within the allocation boundary to determine the extent of any remains associated with the adjacent Scheduled Ancient Monument.

Connectivity onto Wyke Road and public rights of way will be required to ensure good pedestrian/cycle access. The development should maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. In particular, it should explore opportunities to provide bus stops on Musbury Road to improve sustainable travel options.

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.: We ask to be kept informed of next stages of consultation and also that we have an opportunity to participate in any public examination of this document.

Full name: Sarah Smith

Organisation (where relevant): Rapleys LLP

Other party name (if relevant): The Crown Estate

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: TCE support the allocation of 225 dwellings and associated land-use at GH/ED/80a – see fuller representation for further explanation.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: AXMINSTER/SITE-SPECIFIC POLICY SD02 (GH/ED/80A)

5.1 Within this policy, land at Prestaller Farm, GH/ED/80a is allocated for 225 dwellings and a community hub which should provide opportunities for workspace, café/shop and meeting space. Access is required to be via Axmi_22 (land east of Lyme Road) to the south and there is a reciprocal provision within the Axmi_22 allocation as well. TCE supports the principle of the GH/ED/80a allocation, and the amount and use of development identified within the policy.

5.2 The policy also requires the incorporation of a site access road to a standard and location to enable potential future extension for a relief road link to Chard Road to the north. TCE acknowledges the desire for this, subject to viability considerations.

5.3 The policy also acknowledges the remainder of the land under TCE control that lies to the north of the Mill Brook but outside the allocation, noting that where necessary to meet the demands and needs of the development, part of it can be used for off-site open space provision and habitat/BNG mitigation purposes. This is welcomed and supported by TCE. A Vision Document provided in Appendix 3 provides more detail as to how the adjacent land owned by TCE could be developed for the benefit of Axminster

achieving both sustainable development and increasing biodiversity as well as more opportunities for public open space.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To assist and support the Council where necessary in respect of the proposed allocation of the site

Full name: Alister Smith

Organisation (where relevant): Stags

Other party name (if relevant): Mr L Burrough

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Neal Jillings

Organisation (where relevant): Summerfield Homes Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Whilst yes, the policy text is incorrect in stating that delivery of the site is dependent on access being provided through neighbouring developments coming forward. There is a current resolution to grant (with DCC Highways support) with access from the existing adopted highway

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: delete sentence starting 'development at this location....' is it is plainly incorrect as a matter of fact

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Dr Paul Bridge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: All sites selected in Axminster appear to fall within the first two SSSI impact zones for the River Axe SSSI. All drain directly or indirectly in the act but the adverse impact assessments do not appear to be consistent. On the basis of their positions in the impact zones at least medium and possibly major impacts would be expected, particularly as the SSSI refers largely to the river environment. However for most sites the impact is given as "major" in the text, but "minor" in the analysis tables.

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.: For SD02 the site assessments remain superficial and although they have been improved since the earlier version they require further detail work for consistency and accuracy.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am concerned as to how "joined-up" the thinking is. As with other aspects of the Plan, the impacts on the river SSSI and SAC do not relate to a single place and can only be fully considered when combined with all other potential up and down stream developments. At present I can see no inclusivity for river impacts.

Full name: Dr Paul Bridge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: A meeting of Axminster residents identified that many were unaware of the plan details or the proposed site locations. The on-line only method for information and comment was considered ineffective and unsuitable. A significant minority of Axminster residents believe that SD02 has not been adequately consulted.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Four of the sites listed were considered by residents as not practical or suitable (GH/ED/SOa, Axmi_02, _08 and _09). Previous applications for development on two of these sites have previously been refused and the site geography/topography has not changed. A meeting of local residents considered that site selection was not evidence-based with only superficial site assessments. These four sites are open fields on steeply sloping land that drains directly in to the River Axe through other areas of high risk of flooding. The sites all currently waterlog from October to March and the loss of water retention and run-off changes was considered a major risk. Local surface water flooding already occurs around these sites and mitigation of this is required before any further development and mitigation can be considered.

The sites selected within Axminster do not relate to the propose Axminster Relief Road (see 11.10) and sites associated with that have been rejected without apparent justification. The existing road network and drainage systems in Axminster are already above capacity and make any new development within the town or on the valley sides impractical without significant water retention and road changes. Human infrastructure

in terms of healthcare, professional services and education (there is currently no 6th form or tertiary education available) are not considered in the policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The four sites already found to be unsuitable should be removed and the site selection exercise needs to be re-visited to identify sites that could be practically developed. A properly evidence based selection needs to be undertaken with regard to the route of any future relief road, potential flooding impacts and development of the current railway service and infrastructure. This is required in order to provide practical sites and associated infrastructure, A sustainable

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: All drainage in Axminster goes into the River Axe and fills the existing broad floodplain above the tidal limit at Colyton Bridge. Any increase in river level at Axminster has implications for increased flooding around the current flood plani which includes communities at Musbury, Colyford and Colyton as well as the railway line which is already compromised by seasonal landslips between Crewkerne and Honiton. The primary catchment area for the River Axe is in West Dorset and Somerset and there is no apparent consideration of potential river level increases from development in these areas. It is not possible to accurately gauge or mitigate water levels in Axminster without detailed knowledge of upstream and downstream events. In addition to the road constraints within Axminster, both main road routes through the town (A35 and A358) are single carriageway with the exception of the Raymonds Hill-Kilminster section of the A35. Axminster residents rely on services and facilities in Exeter, Chard, Taunton and Bridport and any expansion of the town should consider the necessary improvements needed for the existing road and rail links.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I do not think that there is sufficient joined-up thinking in the current strategy for Axminster. I am concerned that site selection is not evidence-

based and appears to bear little relation to the potential Axminster relief road. I do not think that the strategy as presented is either deliverable or sustainable

Full name: MARY DARLOW

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2(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.: Reference is made to the possible relief road which “should” be made. This is not reassuring at all. The policy should insist that the relief road WILL be provided because failure to do so will cause no end of problems for the town.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Too many houses are being proposed for too small an area. Axminster does not have the infrastructure to support so many new dwellings. Before developing these sites, provision must be made for new schools, health care facilities, shops, better roads and a more reliable transport infrastructure. With these things in place, additional dwellings would be easier to subsume into the existing Axminster community.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Too many houses are being proposed for too small an area. Axminster does not have the infrastructure to support so many new dwellings. Before developing these sites, provision must be made for new schools, health care facilities, shops, better roads and a more reliable transport infrastructure. With these things in place, additional dwellings would be easier to subsume into the existing Axminster community.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As already mentioned. The existing infrastructure cannot support this many new dwellings.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Ferdinando

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In 2022 when researching the purchase of my property in Sector Lane, I confirmed with East Devon Council that the land in question had been removed from the local plan due to inadequate access when the funding of a relief road was removed and that agricultural pollutants in the soil were too high. I was assured that no homes could be built on this land, indeed no applications for building would be considered for at least 20 years. On that basis, I purchased my property. The land has continued to be used for the grazing of sheep and cattle and is regularly sprayed with farm manure to help fertilize the healthy growing of pasture for grazing. So, how has the level of nitrates and phosphates now reduced making it safe for residential development? The access road has not been built and the plan uses a completely meaningless and woolly statement 'Sector Lane should be reconfigured'. How? The road outside my property, 'Wilwyn' is not wide enough for two vehicles to pass. Vehicles have to pull on to my driveway to pass. This includes HGVs, agricultural vehicles, vans and cars. My driveway is not designed for such weight/usage. How will I be compensated? The plan infers that Sector Lane be closed to through traffic, but how will the daily milk tanker access the nearby farm? The 'other end' access point is too steep/narrow and bendy for such a vehicle? There is no footway outside my house. The suggestion that Sector Lane is a suitable pedestrian or cycle route for not only the 225 dwellings on this plan, but the 100 on the land East of Lyme Road is laughable. It will be dangerous, even if the road is no longer a through road, the users of the existing residents of Sector Lane and its various cul de sacs mean the road is almost constantly in use by vehicular transport. Weycroft Bridge is a Grade 2 listed bridge, already subject to 4 way traffic lights and regularly floods. Additional traffic will endanger the bridge. The additional housing will create faster rain water run off, increasing the risk of flash flooding. Nearby Stoney Lane is regularly blocked with excessive vehicles, particularly when infrastructure failures have occurred on the Chard Road, creating gridlock. What arrangements are in place to mitigate this? There is nothing in the plan that explains this. The report keeps using

words like 'potential' and 'should', 'maximise' and 'sustainable', none of which this plan displays. The plan refers to the railway but on numerous occasions when I have used the railway, the allocated trains have been packed or formed of just two carriages. What is in place to ensure the rail provision is improved? 'Should' doesn't mean it will. There is no youth provision in the town. No open Police station. Inadequate dental practices and health centres. Lack of local shopping facilities will mean more traffic on to already congested roads. No multi faith provision for the increased diversity of existing residents, even before these hundreds of new properties are built. The stench of sewage from the local sewage farm and the clear evidence of pollutants entering the water course proves the existing facilities cannot cope with existing use. These additional properties will be an environmental catastrophe.

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.: Removal of the area GH/ED/80a from the plan. Axminster has already expanded far faster than most other areas of Devon. Whilst it is understood Axminster is surrounded by National Landscape and protected areas, high density housing squashed into Axminster will undoubtedly affect the surrounding countryside from increased traffic, light pollution, noise, antisocial behaviour and damage to farm land.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I was previously assured that this part of the plan had been removed following the removal of funding for a suitable bypass and the agricultural pollutants in the land. This was in 2022. Nothing has changed since then to make it 'sound' so therefore it should be removed from the current plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Since the area in question should no longer be in the plan, the only modification would be to remove it and consider alternative locations.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I do not believe there has been adequate consultation with those likely to be most affected.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I do not trust the my views or those of many of the current residents of Axminster have been adequately considered.

Full name: Susan Gallagher

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I believe it is non compliant because it does not allow Axminster the opportunity to grow in a way that respects its history, environment, and community needs. It does not demonstrate or quantify that new developments are well-planned, environmentally responsible, and supported by the right infrastructure that creates a future that benefits both current and future generations. This is not a collaborative approach with a joined up plan — where residents, planners, and developers work together that would help achieve the best possible outcome for our town.

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.: Transform this plan into a cohesive, data-driven strategy with clear baseline metrics and a well-defined infrastructure timeline that ensures: Axminster has a unique opportunity to grow in a way that honors its history, safeguards its environment, and meets the evolving needs of its community. To achieve this, new developments must be carefully planned, environmentally responsible, and supported by robust infrastructure from the outset. A well-structured approach—where housing, transport, public services, and utilities are developed in tandem—will create a sustainable future that benefits both current and future generations. By fostering collaboration between residents, planners, and developers, we can ensure that growth is not only well-managed but also enhances the town’s character and quality of life. A strategic, phased approach—guided by clear timelines and measurable outcomes—will deliver the best possible future for Axminster.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: see 2 above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: see 2 above

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: see 2 above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am passionate about ensuring that Axminster grows in a way that respects its rich history, protects its environment, and meets the evolving needs of its community. This can only be achieved through a well-coordinated, collaborative and strategic plan that integrates development with essential infrastructure and sustainability at its core.

Full name: Roger Gallagher

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I believe it is non compliant because it does not allow Axminster the opportunity to grow in a way that respects its history, environment, and community needs. It does not demonstrate or quantify that new developments are well-planned, environmentally responsible, and supported by the right infrastructure that creates a future that benefits both current and future generations. This is not a collaborative approach with a joined up plan — where residents, planners, and developers work together that would help achieve the best possible outcome for our town.

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.: Transform this plan into a cohesive, data-driven strategy with clear baseline metrics and a well-defined infrastructure timeline that ensures: Axminster has a unique opportunity to grow in a way that honors its history, safeguards its environment, and meets the evolving needs of its community. To achieve this, new developments must be carefully planned, environmentally responsible, and supported by robust infrastructure from the outset. A well-structured approach—where housing, transport, public services, and utilities are developed in tandem—will create a sustainable future that benefits both current and future generations. By fostering collaboration between residents, planners, and developers, we can ensure that growth is not only well-managed but also enhances the town’s character and quality of life. A strategic, phased approach—guided by clear timelines and measurable outcomes—will deliver the best possible future for Axminster.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

See my response to 2 above

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See my response to 2 above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See my response to 2 above

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See my response to 2 above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am passionate about ensuring that Axminster grows in a way that respects its rich history, protects its environment, and meets the evolving needs of its community. This can only be achieved through a well-coordinated, collaborative and strategic plan that integrates development with essential infrastructure and sustainability at its core.

Full name: Sabra Gardner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed Allocation of sites – specifically Axmi_02, 08, 09

1.Flooding. My comments relate to this section of the proposal (Axmi_02) -and the adjoining Axmi_08 and Axmi_09. The public footpath known as Fairy Lane forms part of the heritage Fosseway. As a path leading from the fields to Musbury Road - during periods of heavy rainfall this path becomes a torrent of water. A drain cover is installed at the junction of Fairy Lane and Musbury Rd - however this is often covered in debris and therefore insufficient to handle the quantities of water. There is no other drainage in the area for surface water collection. What is not apparent from a 2D map is the gradient of the land and how much higher the fields are than the houses. Therefore - the water flows directly over the road and floods the houses opposite our property which are at a lower level than the road – as well as flowing down the road. In periods of cold weather, this then freezes becoming a significant hazard.

With the current drainage systems unable to deal with current rainfall events - if the fields were to become a housing development - reducing natural drainage into the ground - flooding events would significantly increase causing devastation to households - both financial and practical. This could also impact the nutrient neutrality

in the area. Excess water drainage due to concreting over the fields would increase nutrient pollution, causing potentially disastrous effects on water quality, the environment & biodiversity.

2. SWW Inadequate infrastructure. South West Water (SWW) have attended multiple times over the last few years - sometimes for planned works but often for emergency reasons. However the issues with poor drainage / sewerage facilities servicing our property and our neighbours continues. They have dug up the road outside our property multiple times, each time apparently repairing or reviewing the dated infrastructure - but issues continue. I am awaiting info from SWW – but these are just some of the visits – Oct 3rd & 15th 2018, July 2021, Significant issues Oct 2021, 6th Dec 2022, 31st July 2024, (closing road suddenly). Another leak issue occurred in Lear Lane on 20th Sept 2024– with SWW returning again on 11th Oct as still leaking – yet another reminder of failure of infrastructure / old pipes. Myself & neighbours report numerous occasions when there has been high rainfall and consequently flooding. Indeed in October 2021 due to massive flooding, they have had to pay for drain clearance / installation in their driveways and have sandbags at the ready.

With the current SWW network totally inadequate for the current housing on this section of Musbury Road - it would be a catastrophe to add any further development to this system.

3. Road Safety. At this section of Musbury Road, the road is narrow, on the brow of a hill (as our house name suggests) with no footpaths either side. The speed limit of 30mph is not adhered to and as one of the main road and bus routes into Axminster – it is already a hazard for safety - not only for any cars trying to exit their driveways / houses - but also no pedestrian access down the road. Often, people have to take their lives in their hands to attempt to ‘bunny hop’ from one drive to another in an attempt to navigate this section of road. The road at this section is barely wide enough for 2 cars, and when

buses or lorries use this, there is absolutely no margin for manoeuvre – especially if a motorist was to come across a pedestrian having to walk along the road.

As will be noted, most properties have had to instal multiple mirrors to aid access in and out - so I cannot see how safe access would be provided not only for any housing development - but also for contractors during building. To emphasise the safety issues, I have detailed some serious accidents just on this section of Musbury Road – 19/8/13, 10/8/17, 20/10/17, 15/6/18, 26/8/22, 3/11/22, 15/3/24. Limited visibility at this section of road would negate any access around the Fairy Lane site and there is no possibility of widening the road due to the housing on either side.

A potential access could be Woodbury Park / Wyke Road - however these are also extremely narrow roads with current housing developments limiting widening of these roads - so safe and accessible routes in and out of the proposed sites is not viable.

5/8/2016 –Axminster Neighbourhood plan – The summary stated “there is consistency across the County, District and Parish that a relief road is necessary as the only way of reducing the problems in the town centre”. Obviously – this was not undertaken when the last developments were planned and built – so if this was necessary then – how would the town cope with additional proposed housing?

4.Access to Facilities. Access to facilities in the town (ever dwindling) and through the town via A358 is already extremely congested due to the nature of the narrow roads and old buildings - so again if there was a huge increase in numbers of people accessing the town and trying to park, drive from one side to another - the current infrastructure is totally unsuitable. Another consideration would be the lack of pedestrian access from this area of Musbury Road into the town centre. Should additional homes be built on these fields, how would climate friendly pedestrian / bicycle access from these developments into the town centre be managed ?

5. Archeological interest. Archeological remains were recently found within the proposed site, with a nearby Scheduled Ancient Monument - what investigations would be conducted regarding these archeological sites to safeguard these areas of archeological / historical significance?

6. I have recently taken part in the Devon Bat Survey - which found a number of bat species around my property with the Western Barbastelle found (as a 99% probability) a rare and threatened species. I would enquire as to what environmental / species investigations will be conducted to ensure that wildlife and particularly endangered species are not further harmed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Flooding risk would need to be addressed as well as nutrient neutrality due to the proximity of the River Axe. Provision to take water away from Musbury Road as per the current gradient would need to be provided.

2. South West Water infrastructure is required to be completely installed - new drainage and water facilities to protect land and current housing - never mind the additional 1409 proposed .

3. Road safety is currently an issue - so provision of access for construction as well as house holders on the proposed site would need to be separate from current Musbury Road. There needs to be additional relief road for large lorries which would affect road safety around Axminster. This was seen as necessary in 2016 but has still not been built! Public right of way and bicycle paths should be installed to allow for safe sustainable travel from the proposed site to the Axminster town centre. There needs to be thought about how people would access the opposite side of the town centre as the current High Street would not suffice.

4. Access to facilities in town centre is already congested - so new relief road to access these would be necessary - as well as planning for new schools, medical facilities to cater for 1409 new households.

5. The proposed areas Axmi_02, Axmi_08, Axmi_09 should be removed from the Plan as the potential for further flooding due to land gradient and South West Water inadequate infrastructure, road safety and access to site and Town Centre concerns are too severe.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I don't believe that this policy complies with a duty to cooperate as no consideration has been given to alleviate the current flooding, road access and safety concerns.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I feel that the considerations of the Land owners currently outweighs the significant concerns of the local community as we have put forward valid concerns which have not been taken into account when preparing the Local Plan.

Full name: Ian Harrington.

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: No development in Axminster should encroach on the wellbeing of the River Axe and it's fragile eco-system. Or any development that will further increase the already serious flooding risk to the properties and road at Weycroft. The council, in their ignorance have passed this development despite many objections and several other preferred site in Axminster being overlooked, sites that don't encroach on the River Axe's eco-system or flood risk to properties. The development in question is Ref No:(GH/ED/83) land West of Chard Road.

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.: Build the proposed development on one of the other preferred sites in Axminster as listed in the plan. One that is nowhere near the River Axe

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As previously stated, the development is far too close to the River Axe which will lead to pollution and more flooding at Weycroft. Also destroying the many large hedge rows will kill untold numbers of wildlife including many species of birds, lizards, adders, bats in the WW2 pill box, otters in the River Axe at Weycroft and breeding cormorants. The area at Weycroft with it's grade one and two buildings with the backdrop of fields and the River Axe views will be blighted for ever.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As stated previously, permission for this development should never have been given by the ill informed planning committee and why another preferred site wasn't considered beggars belief.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As previously stated, I am (as are many) upset and baffled as to why one of the other preferred sites listed in the plan that didn't encroach on the River Axe or Weycroft with it's flooding and the destruction of wildlife, wasn't considered. Some investigations by an independent body should be in order before building commences.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To make sure that the River Axe and Axminster's wildlife has a voice.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are inconsistencies within the policies SP04, SD01 and SD02. Site Axmi_11c is described within SD02, yet site Axmi_11a is mentioned within the Spatial Strategy SP04 on page 39. Where did Axmi_11c come from as this was not in Reg 18? Site reference GH/ED/80a is described within SD02, yet site GH/ED/80 is mentioned within the Spatial Strategy SP04 on page 39, and is also mentioned within the description for site reference Axmi_22 in SD02. Site reference Exmo_20 is described within SD01, yet site reference Exmo_20b is mentioned within the Spatial Strategy SP04 on page 39.

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.: Resolve the inconsistencies identified.

Full name: Stefan Laeger

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There is a government requirement to consider the impact of new developments the environment and transport. Proposing 1400 new homes in Axminster without improving single lane Weycroft bridge (which is the ONLY access road to the town from the north) will lead to significant traffic and environmental impacts and congestion. This has not been appropriately considered meaning the plan is not legally compliant.

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.: Either 1) make a firm commitment in the plan to put in place strategic mitigation measures/policies by committing to improvements to single lane Weycroft bridge (which is the ONLY access road to the town from the North) to enable these significant housing developments or 2) reduce the housing allocation for Axminster to a level which is more sustainable in terms of traffic impacts. This is likely to only be around 500.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Same reason as above, this section of the development plan is not sound as environmental/traffic impacts have not been adequately considered, identified nor strategically mitigated.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Either 1) make a firm commitment in the plan to put in place strategic mitigation measures/policies by committing to improvements to single lane Weycroft bridge (which is the ONLY access road to the town from the North) to enable these significant housing developments or 2) reduce the housing allocation for Axminster to a level which is more sustainable in terms of traffic impacts. This is likely to only be around 500.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: During the plan preparation the EDC spatial planning team has clearly not co-operated with the EDC highways team or the Department for transport . This has led to a situation where major transport/environmental impacts due to significant proposed Axminster housing developments clearly not been properly assessed or strategically mitigated through appropriate planning policies. Hence the plan is not meeting the duty to co-operate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: My name is *** Personal details have been removed ***; I am a resident of Axminster. My email Address is *** Personal details have been removed *** The online consultation did not allow me to input my details any other way.

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: DEVELOPMENT IN THE TOWNS AND VILLAGES The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution. Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
See response to Q2(b)

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See response to Q2(b)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I have no idea and am therefore neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Hayward

Organisation (where relevant): Axminster Town Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Evidence base. Although the Local Plan document contains paraphrasing or reproduction of all of the constraints, guidelines and regulations regarding planning applications there appear to be few examples of any of these being considered in the selection of development sites. At best individual site assessments appear to be superficial (and may lack due diligence) and none made any reference to specific constraints or recommendations. There are numerous obvious constraints including lack of access, drainage onto high flood risk areas, biodiversity loss from currently open land, ancient hedgerows and known archaeological remains. (many of which have been repeatedly stated in earlier consultations but not addressed). There is currently no detailed evidence to justify how the sites were selected or preferences ranked, This is particularly concerning as one site was previously considered unsuitable for development in 2023 due to soil contamination, access and drainage issues¹, constraints that have not changed in the last 2 years. A planning application for 16 houses at another selected site² was previously rejected due to access issues. There are numerous constraints that apply to the proposed sites and no justifications provided as to rejection of other “brownfield” sites proposed earlier in the consultation. Although the term “mitigation” has been used there is no detail of what this might entail or potential costs and land usage involved. We believe that there is little point “offering” sites that cannot be developed in practice, As proposed changes to planning processes will involve less public scrutiny we believe it is important that accurate evidence based selections are considered at any early stage. Sustainability. The Local Plan makes brief mention of the previously proposed N/S Relief Road. Without this facility all traffic through or round Axminster must use the single narrow route bordered by listed buildings or the single track road at Stoney Lane. The developments as proposed would expect to result in a further 1430 cars³ on already congested single track roads. Existing

drainage in the town is already at capacity with frequent surface water flooding events. All drainage goes into the River Axe which has resulted in multiple floods at Weycroft, in the town, at Trafalgar Way and in downstream settlements. Any increase in river level will exacerbate these events and potentially threaten other infrastructure on the border of the existing flood plain such as the railway line. Current medical and dental services are at capacity and the recent reduction in provision at Axminster hospital are real current constraints that need to be considered before the proposed 2,50004 population increase. Climate change. The site assessments and town plan do not consider the likely impacts of climate change on the existing town, or the proposed development. The single most likely effect of a warmer world is increased rainfall. Most of sites considered are now continually waterlogged from November-March and losing that stored water facility will significantly impact on river levels. As 1 inch of rain on 1 hectare will produce 250 cubic metres of water and 2-3 inches of rainfall in 24 hours is now not uncommon, the plan needs to consider the level of additional mitigation that will be required for the existing town before adding further run-off from the new developments. Joined up thinking. We believe that there is little direct evidence of joined up thinking in the plan. The catchment area for the Axe valley is largely in Dorset and Somerset and the plan provides no details of any proposed developments in those counties that could affect river levels. Existing wildlife, hedgerow, biodiversity and historic constraints are listed in the plan but not applied in any detail to any sites. Some notable examples are Myotis species bats which include Devon Wildlife priority species that are known at Axmi-02. Some of the other wildlife issues that have not been considered include ancient hedgerows and other Devon priority animal plant and fungi species (sites Axmi-02, 08, 09 and others), It seems unlikely that replacing open countryside with built environments will achieve the 10% BNG5 required under current policies. The sites at Axmi-02 and Axmi-08 contain some 50 acres of the original settlement associated with the Roman Fort at Woodbury⁶ and the passing reference in the plan gives no assurances as to how preservation and access to this will be maintained. A significant lack of joined up thinking relates to travel in the area immediately outside Axminster. There appears to be no considerations made of additional traffic loads on the the A35 and A358 which are single carriageway between Axminster both Honiton and Chard and which are already severely constrained at Chideock, Honiton and Chard. Potential developments in Dorset and Somerset will add to the current traffic levels on these routes and in surrounding towns, but do not appear to have been considered. Although the presence of a railway station in Axminster is featured in the plan, the current station car park is already at capacity with “overflow” parking occurring on nearby residential roads. The station car park contains the main entrance to the Mole Avon store and yard and also serves as a bus station. There is no free land to enlarge the station car park and any additional parking in the area would compromise business access and necessitate finding another site in the town for the bus parking. The one train an hour service on a single track is particularly vulnerable to

frequent landslips between Crewkerne and Honiton and these constraints have not been included. As detailed above the railway line borders the existing flood plain and would be at risk if the river level increased. Conclusion The conclusion of the meeting was that the developments in Axminster would not be either sustainable or deliverable as currently proposed. The meeting agreed that there was a need for development proposals to be fully evidence based with appropriate infrastructure development included at the outset. We believe that the absence of these and the other issues leaves the current draft of the Local Plan as “not fit for purpose”.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land west of Chard Road (GH/ED/83) - there is no mention of the flood risk elements in this section. Flood risk and the requirement for flood risk assessments are mentioned in other policies, so it is not clear why not in this one, especially given the proximity to the River Axe. Land east of Musbury Road (Axmi_02, Axmi_08 and Axmi_09)- we support the requirement for a masterplan on this site, especially to suitably manage the flood risks.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Axmi_01a: While we welcome the reference to the two non-designated WWII pill boxes, the policy fails to acknowledge the close proximity of Newenham Abbey Scheduled Monument, and other archaeologically rich areas associated with a Roman Fort and Roman Road nearby to the east. When taken with other constraints such as flood risk, which isolates the site from the urban edge of Axminster, we query whether this site allocation is justified?

Axmi_02, 08, 09: Adjacent to Woodbury Lane and surrounded by the proposed allocation on two sides is the Scheduled Monument known as ‘Roman fort and later Romano-British settlement at Woodbury Farm’. This is a heritage asset of the highest significance according to the NPPF. Nearby to the west is the line of a Roman Road known as the Fosse Way (as well as WWII records on the HER). The site assessment report notes that associated archaeology may extend beyond the site, particularly to the west. There is therefore potential for significant impacts on archaeology, of a magnitude as yet unknown, which the site selection report acknowledges ‘may constrain or prohibit any development on parts of the site’. In addition to this, the potential harm to the setting of the asset is considerable. Built development across the site would remove or fundamentally alter the physical and visual relationship between the Scheduled Monument, the route of the nearby Roman Road and the landscape over which the fort would have had surveillance, falling to the River Axe before rising to the hills beyond. This site allocation is therefore unsound as it is not justified (based on proportionate evidence relating to archaeology and setting impacts), it is inconsistent with national policy, and it is not effective as there are questions around deliverability.

Axmi_23: Given the sensitive town centre location including multiple designated heritage assets, an adjustment to the wording of this policy is requested to better align with legislation and national policy.

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.:

Axmi_01a: As there is an oversupply of employment land this site should be prioritised for removal from the Plan. If the site is nevertheless progressed as a potential site allocation, the policy would need to be strengthened to ensure that there is adequate consideration of the historic environment and to secure appropriate design.

Axmi_02, 08, 09: We recommend that this site allocation is removed from the Plan. Otherwise, as this is an area of high archaeological sensitivity, a desk-based assessment and potentially a site evaluation would be needed to justify a site allocation. Please refer to the Plan-making section of our guidance on Planning and Archaeology, in particular from p24. A more detailed understanding is also needed of potential impacts on the settings of heritage assets, and whether this could be minimised and mitigated.

Axmi_23: “Very careful design will be needed to reflect conserve and enhance the character and appearance of the Conservation Area location and the setting of surrounding heritage assets.

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: 47. Strategic Policy SD02 seeks to allocate sites in Axminster for more than 1,000 new dwellings and 4.8 ha of employment land. Selected allocations for land west of Musbury Road (Axmi_01a) and land east of Musbury Road (Axmi_09) appear to bound the A35 corridor either side of the Abbey Gate junction. The concentration of development alongside the Abbey Gate junction and the high-speed single carriageway nature of the A35 at this location could give rise to road safety issues as a consequence of additional turning movements. 48. It is recommended that the policy wording for proposed allocations Axmi_01a and Axmi_09 should reference the proximity of the SRN and the need for development to avoid any adverse impacts in terms of road safety and National Highways asset. Pedestrian access onto the A35 from neighbouring development sites should also be prevented given the lack of available facilities and the high-speed nature of the road.

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Planned development in Axminster will increase turning movements on the high-speed A35. Whilst some allocations are again carried forward from the adopted Local Plan, it is appropriate to consider their cumulative impact. The Abbey Gate and Symonds Lane junctions have both experienced recent collisions involving turning vehicles, albeit neither are currently identified as Accident Cluster Sites by National Highways. Whilst the planned level of growth is unlikely to require strategic transport improvements, it will be important for future planning applications to consider the safety implications of planned growth, and individual allocations may yet require localised works to the SRN to offset any adverse impacts. This should also be a consideration as part of any future assessment of the Axminster Relief Road, which remains a safeguarded ambition of the plan, and could alter traffic demand at the A35 junctions.

SD03

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We have already made comments about the current dire sewage situation in the River Otter catchment. Building an additional 1,642 homes will only make the situation much worse.

Full name: Jon Williams

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: We are fully supportive of this allocation and consider this site as fully suitable for development.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
We are fully supportive of this allocation and consider this site as fully suitable for development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: We are fully supportive of this allocation and consider this site as fully suitable for development.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Policy SD03 should reflect the need for improved secondary education facilities in Honiton and recognise this as a requirement to support the policy and wider aspirations of the plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Requested changes to Policy SD03 are shown below with bold for additional wording: “Improved secondary school facilities in Honiton are required to support further development in Honiton and the wider aspirations of the plan. In addition, further provision for pupils with special educational needs and disabilities in Devon is required.”

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Combe Estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(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.:

On behalf of Combe Estates

INTRODUCTION Combe Estate are long standing generational owner of large areas of agricultural and forestry land within East Devon. Their land interests are primarily in Honiton and Gittisham. As part of its interests, the Estate undertakes residential and commercial development and are the owners of Combe Garden Centre. The Estate therefore has a wide range of land and business interests within the district. The Estate has provided representations to the Council as part of previous consultations on the draft local plan and via the related call for sites process. Given the nature of their long-standing presence in the district, The Estate is an important local stakeholder with allocation interests within the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 5. DEVELOPMENT IN THE TOWNS AND VILLAGES Strategic Policy SD03: Honiton and its Development Allocations Combe Estate supports the development allocations for Honiton listed in Strategic Policy SD03 and identified on the Policies Map, particularly Land west of Hayne Lane (site reference Gitti_03, Gitti_04 and Gitti_05) for which they have existing land interests. They are also part owners of Land adjacent to St Michael's Church (site reference Honi_07). The Estate are committed to seeing both of their sites and respective allocations delivered. Site Specific – Gitt_03, Gitti_04 and Gitt_05 The inclusion of Gitti_03, Gitti_04 and Gitti_05 for mixed use development is clearly supported as its represents a logical approach to development and growth to the west of Honiton, noting:

- the position of Honiton within the settlement hierarchy for East Devon;

- the sustainable transport options and overall level of services and facilities in the town;
- the proximity of the site to the A30 COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2
- The location of the site relative to existing jobs and food retail provision within the town of Honiton;
- The constraints that exist elsewhere in the settlement (for example this site can be delivered entirely outside of the AONB). Strategic Policy SD03 is considered to be sound, though we would recommend some modest tweaks/changes to wording. The specific policy allocating Gitti_03, Gitti_04 and Gitt_05 states; “Land west of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) Land to the west of Hayne Lane, on the western side of Honiton, is allocated for a mixed-use development to provide: A. 310 homes; and B. 14.6 hectares of land to accommodate employment and community uses. This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. Southern parts of the site are in the East Devon National Landscape and this area will require very careful design to take account of its landscape setting. On the western edges the site is close to the historic village of Gittisham and particular sensitivity will need to be attached to preventing adverse heritage impacts. These southerly and westerly parts will be best suited for open space uses. Commercial and employment uses will need to be concentrated to the north of the railway line bisecting the site with residential uses to the south. Community facilities, to include a shop or shops and a hall, will need to be provided within or next to 84 residential parts of the development. There will be the need for attractive and safe pedestrian and cycle linkages between the southern and northern parts of the site (ideally utilising an existing passage under the railway that lies in a roughly mid-way point in the allocation). It is expected that vehicular access to the residential development will be via the existing estate to the north (i.e. via Meadow Acre Road). Vehicular access to the employment development will need to come via Hayne Lane. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes, including bus services.” In terms of the objectives of the policy we would draw attention to the masterplan submitted in support of the current representation. We would ask that it is noted that: COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 3
- The Estate are committed to seeing the site delivered for a minimum of 310 homes.

- The Estate are committed to delivering the area of land to the north of the allocation which comprises part of the 14.6 hectares of employment and community uses (note part of this is land owned by EDDC) – however, additional flexibility should be built into the definition of uses permitted in this part of the policy to include wider commercial uses and leisure uses.
- The need for masterplanning of the sites is noted, and this can be controlled in-part, through an outline planning application.
- The development can be accommodated without being located within the East Devon National Landscape and account can be taken of landscape setting.
- Similarly, the evolving masterplan takes account of the topography and proximity of the historic village of Gittisham on the western edge the site which has taken account of topographical features and heritage assets.
- Both of the areas above can be utilised for BNG delivery and open space to ensure appropriate setting is retained for heritage assets and landscape designations.
- The Estate are happy to provide community facilities, to include a shop or shops and a hall as part of any wider masterplanned development.
- The importance of attractive and safe pedestrian and cycle linkages between the southern and northern parts of the site are also noted and deliverable.
- In terms of vehicular access to the residential development – this should not be solely from Meadow Acre Road – which is located within an adjacent development. Access will be available from Hayne Lane (as per transport / access notes submitted at the Reg.18 stage) and shown on the masterplan, with a secondary route potentially available from Higher Ash Close. As such, the allocation of the site for residential development is sound and supported by appropriate officer assessment in the submitted evidence base. Site Specific – Honi_07 The Estate are in control of land identified as Honi_07 – this was previously put forward as an allocation for 30 dwellings in previous versions of the plan. The client's land can be accessed directly from Waterleat Avenue to the north. During the preparation of the Regulation 19. Version of the Local Plan, Members have decided to allocate Honi_12 (land east of Cuckoo Down Lane) as additional development land. This site is landlocked and access would need to come through our client's land for delivery. Our client has no objection to the principle of this approach, but, given Honi_07 is road fronting this part of the allocation will need to come forward first to facilitate access to the wider development. COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 4 As drafted, the allocation states: Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi_07 and Honi_12) This land is allocated for 101 homes and will form a

residential extension on the southern side of Honiton. The site is in the Blackdown Hills National Landscape area and close to heritage assets, it will require very careful design to take account of its landscape setting and the setting of surrounding heritage assets. Therefore a high quality comprehensive development scheme is required for the whole site. Development within allocation Honi_12 is expected to be dependent on development within allocation Honi_07 coming forward, as access needs to be from Weatherill Road. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.” As drafted, the policy notes the different land ownerships and clearly Honi_07 will need to come forward first to secure access to Honi_12. Our client is also aware that Honiton Town Council may object to Hon_12 (the additional land beyond our client’s ownership) as an allocation through this process. This has been reported prior to the consultation on this stage of the Local Plan. Should this be the case, and any further objections raised to the wider allocation, our client would also be prepared to deliver their site as a single allocation for circa 30 dwellings, which previous proofing layouts provided with our reg 18. Submission (and submitted again now for completeness) show can be accommodated on the site. However, we wish to stress that the site can also come forward as part of a first phase of larger development for circa 101 houses if this is felt appropriate. The key issues to stress here, is that The Estate’s land is deliverable. Technical work undertaken to date demonstrates the site is deliverable and it be delivered as a first phase of comprehensive development with the ability to connect to adjacent land parcels. Summary Position / Conclusion Combe Estate are of the view that both of their allocated sites represent sustainable development, and these are deliverable and suitable site for residential led mixed use development that will help meet the overall housing needs in Honiton and East Devon. COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 5 It will provide much needed housing and new employment space for growth in the main centre of Honiton. The site will also assist in meeting affordable housing requirements in the town and the wider East Devon area where there is significant under supply. Both sites are immediately available for development and The Estate are committed to seeing the sites delivered for their allocated uses. The Estate generally support the Council’s approach to the spatial strategy and residential land allocations and consider that these are sound, justified and positively planned. However, the drafting of some of the policy could be clarified through the provision of further detail whilst some policies will benefit from the inclusion of more flexibility. Combe Estate’s key comments on the allocations they are promoting through the Regulation 19 Publication Draft can be summarised as:

- Honiton is suitably identified as a ‘main centre’ in the settlement hierarchy and is rightly a location for significant growth.

- Combe Estate are supportive of the direction of strategic employment policy and will deliver the allocation that has been proposed on their land – however, the definition of ‘employment’ should not be too narrow, and there should be the ability to include a variety of alternative uses (including a wider range of commercial and tourism based uses) to recognise the modernisation of the East Devon job market and to ensure that East Devon is not prevented from embracing new and emerging businesses to the area.
- Affordable housing percentages for allocated sites need to be closely appraised and set as low as is reasonably possible to ensure development is viable – this is particularly relevant in Honiton where current AH levels on open market schemes are sought at 25% and with this percentage figure increasing with the next Local Plan.
- Where masterplans are proposed for strategic allocations, further guidance/clarification is needed on these matters – could this not be addressed through a planning application (outline) rather than a masterplan/design code approach?
- BNG requirements should be amended to form a consistent position with national policy on its’ delivery e.g. 10% should be sought rather than 20%.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

2.45 It should be noted that land off Northcote Hill is capable of meeting the requirements of policy SP07 through the delivery of a number of public benefits, including extensive areas of public open space; highway improvements to support the vehicular trips likely to arise from

the proposed development; community park; neighbourhood hub; and enhancement of walking and cycling routes.

2.53 Land off Northcote Hill, Honiton (south of the railway line) should be allocated to deliver 285- 300 homes, which would ensure the development can make a meaningful contribution towards EDDC's housing land supply in the short to medium term, allowing for any unforeseen delays in housing delivery within the new settlement. By increasing the proposed allocation on Land off Northcote Hill, Honiton (south of the railway line), this will ensure that the allocation makes the most effective use of land, in accordance with national policy and guidance.

2.55 It is welcomed that land south of Northcote Hill (north and south of the railway line) is identified as two draft allocations within the draft LP. Taylor Wimpey supports the

allocations and can confirm that both sites are suitable and available for immediate development. Both sites can contribute to the Council's immediate housing land supply.

2.87 Land off Northcote Hill lies on the edge of the Blackdown Hills National Landscape Area and therefore any future proposed development should consider the Blackdown Hills AONB Design Guide for Houses and accord with the principles of the National Design Code and Building for a Healthy Life, and any other local design guidance.

2.88 As illustrated on the supporting Vision Document, land off Northcote Hill can deliver an attractive, well-designed and landscape-led scheme that responds to the site's context and location. The developable areas are carefully located along the site's existing contours, with a large eastern green buffer to frame the development from the wider countryside. The concept masterplan demonstrates how the site can accommodate 285-300 homes on land south of the railway line, which will be integrated with the existing settlement of Honiton.

2.90 In accordance with this policy, Land off Northcote Hill will prioritise sustainable modes of transport and ensure that walking and cycling is prioritised within the development's design. The scheme will deliver an attractive, landscape-led development with extensive areas of public open space, including a community park for the enjoyment of existing and future residents.

2.92 Land off Northcote Hill (north and south of the railway line) is not located within a Local Cycling and Walking Infrastructure route. As set out within the accompanying Transport Note, however, the proposed masterplan will incorporate high quality walking and cycling routes throughout the development and provide off-site pedestrian improvements, including provision of footways to ensure future residents are able to safely access the existing facilities and services within Honiton.

2.104 Land off Northcote Hill will not affect internationally and nationally important wildlife sites. The site lies outside of any Natural England 'SSSI Impact Risk Zones' relating to residential development.

2.117 Land off Northcote Hill is located outside of a nature recovery network. The proposed development will deliver a comprehensive landscape-led scheme, which will deliver a mosaic of habitats and deliver areas of ecological enhancement, contributing to the site's biodiversity net gain.

2.121 Land off Northcote Hill proposes to deliver areas of new public open space, which will be for the enjoyment of the existing and future residents of Honiton. This could include a new community park, which will offer a variety of walking routes, informal recreation and biodiversity enhancements. The various areas of informal open

space (including trim trail equipment) will contribute to the health and well-being of future residents. The proposals are landscape-led and informed by the site's context.

2.123 As demonstrated through the accompanying Heritage Note, by virtue of there being no heritage assets within proximity of the site, land off Northcote Hill is unlikely to lead to harm to the significance of any designated heritage assets in the local area. The proposed development, as shown on the accompanying concept masterplan will ensure, through the design process, that opportunities are taken to enhance the historic environment where possible.

3.17 In the case of land at Northcote Hill south of the railway line (Phase II), it is considered that the allocation does not currently optimise site density through the effective use of land. According to the draft Local Plan, allocation GH/ED/39b is able to accommodate 100 homes. However, through further investigation, the technical information submitted alongside this submission clearly demonstrates that the site can accommodate 285-300 homes.

3.21 This policy is supported and a future planning application relating to land off Northcote Hill will be supported by a suitable Travel Plan and Transport Assessment in accordance with this Draft LP policy.

3.35 Land off Northcote Hill is located outside of EDDC's defined Green Wedges. The development of these allocations would therefore accord with this draft LP policy.

3.39 Land off Northcote Hill is not located within a regionally or locally important wildlife sites, which is noted to include Local Nature Reserves (LNR); County Wildlife Sites (CWS); Unconfirmed Wildlife Sites (UWS); Special Verges designated for biodiversity. The proposed development will not negatively impact Regionally or Locally important wildlife sites and therefore will fully accord with the requirements of this Draft LP policy.

3.52 Any future application relating to Land off Northcote Hill will be accompanied by detailed tree assessments and protection plans in accordance with Draft Policy PB08.

3.63 Land off Northcote Hill offers the opportunity to deliver extensive areas of public open space, which could include a community park, that would be a significant public benefit to the existing and future residents of Honiton. The proposed development would ensure safe pedestrian and cycle accessibility in accordance with this Draft LP policy.

3.65 Land off Northcote Hill is not constrained by heritage assets and offers the opportunity to deliver a sustainable landscape-led development that will deliver significant benefits to East Devon, making a meaningful contribution to the District's housing land supply.

3.67 Land off Northcote Hill is not constrained by heritage assets and offers the opportunity to deliver a sustainable landscape-led development that will deliver significant benefits to East Devon, making a meaningful contribution to the District's housing land supply.

3.69 As set out within supporting technical notes, Land off Northcote Hill is not constrained by archaeological assets. Any future application would be supported by a suitable geophysical survey to ensure compliance with this Draft LP policy.

3.71 Land off Northcote Hill is not constrained by historic landscapes, parks or gardens and offers the opportunity to deliver a sustainable landscape-led development that will deliver significant benefits to East Devon, making a meaningful contribution to the District's housing land supply.

4.6 These representations are supported by a full suite of Technical Reports, which have informed a concept masterplan for land north and south of Northcote Hill.

4.7 The technical reports demonstrate that the site can accommodate a greater quantum of development than set out within the Draft LP. The technical reports are summarised below.

Landscape and Design

4.8 A Landscape Visual Assessment (LVA) was prepared by Stantec in February 2025 which provides Landscape and Visual advice for the proposed residential development at Land off Northcote Hill, Honiton. The LVA provides a series of landscape development principles with the aim of avoiding or reducing any adverse effects on the landscape as a result of the development.

4.9 The assessment states that there is potential for sensitive development at the site that responds to the surrounding landscape areas based on a number of opportunities, constraints and development principles.

Highways/Access

4.10 A Transport Vision Technical note has been prepared by Transport Planning Associates (TPA) and sets out the key transport related opportunities for the proposed development. The report provides an assessment of the following:

- Existing Conditions and Accessibility;

- Existing Local Travel Behaviour;
- Transport Policy and Guidance;
- Transport Vision Overview;
- Access Strategy;
- Masterplan Development and Virtual Mobility;
- Walking and Cycling Vision;
- Public Transport Vision;
- Travel Planning and Other Sustainable Transport Measures;
- Preliminary Junction Capacity Assessment; and
- Summary and Conclusion.

4.11 A technical analysis, assessing the potential impact of the development on the local highway network demonstrates that Phase 2 (GH/ED/39b) can accommodate 300 homes rather than the 100 dwelling currently allocated in the Draft Plan.

4.12 The report highlights that the site is well located in the context of the local and transport highway network and is also well connected with facilities and amenities within Honiton and the surrounding towns and cities. The site is also within walking and cycling distance of a wide range of facilities and amenities in Honiton. The site is situated within close proximity to existing public transport facilities including Honiton Railway Station and a number of bus services. The report demonstrates the possibility to encourage travel via active transport, providing the opportunity to reduce levels of car use by future residents.

4.13 In terms of access, the report concludes that the site can deliver a safe and suitable access for both vehicles and active travel.

Flooding and Drainage

4.14 A Flood Risk and Drainage Technical Note has been prepared by Pheonix Design, which provides an assessment of any flood risk or drainage issues that may be present on the site. The assessment concludes that the site is identified to be of low risk to flooding from all sources, and that the NPPF/PPG Sequential Test and Exemption Test are not required. The assessment goes on to state that Sustainable Drainage Systems will be used to manage any surface water from the proposed development and will ensure that the site is safe from flooding for its lifetime.

Ecology

4.15 An Ecological Deliverability Report has been prepared by EAD Ecology which provides an assessment of the suitability of the site for development. The report confirms that there are no overriding ecological constraints to the development of the site. It is also considered that, where constraints are identified, that measures could be provided to ensure that enhancements deliver a minimum of 10% biodiversity net gain, as per the mandatory requirement, or 20% biodiversity net gain, as set out in emerging Policy PB05. The report also confirms that the development could be carried out in accordance with the national and local (adopted and emerging) biodiversity planning policies.

4.16 The report also sets out the scope for any further ecological work that will be submitted alongside a planning application. Several habitat surveys (set out within the TN), as well as an Ecological Impact Assessment would be required in order to ensure

that all proposed habitats and species are protected or enhanced as part of the scheme.

4.17 An Ecological Constraints and Opportunities Plan has also been prepared by EAD Ecology and provides an overview of the site's ecological constraints and opportunities. The plan outlines the key ecological constraints for the site which include the hedgerows, scattered broadleaved trees and buildings, watercourse and pond, and lowland mixed deciduous woodland. The constraints include priority habitats which have the potential to support protected species as well as watercourse creating a buffer from development. However, these constraints are overcome via the key ecological opportunities.

4.18 The key ecological opportunities include the creation and enhancement of habitats within Green Infrastructure which will provide a net gain in Priority Habitats such as species rich

hedgerows, traditional orchards and wildflower meadows. Habitats with low ecological value, such as modified grasslands, offer opportunities for habitat improvement. Provisions for Biodiversity Net Gain will also be implemented.

4.19 A Habitat Management and Monitoring Plan could also form a condition to a future planning permission which would ensure the long-term management of all retained and proposed habitats.

4.20 If species are identified on site, the provision of new reptile hibernation sites and boxes for birds, dormice, bats and invertebrates could also be provided within the Public Open Space as well as within the structure of the new buildings.

Tree/Arboriculture

4.21 A Tree Survey Report has been prepared by RPS, in February 2025, in respect of the proposed development. A total of 86 individual trees were surveyed during the assessment. Additionally, the survey recorded 55 tree groups, 1 woodland area, 30 hedges, and 2 scrub areas. Most of the trees on the site were located either in the old nursery to the south, within the woodland along the northern boundary, or as hedgerow trees. The rest of the survey area consisted mainly of open fields. It is noted that there are no TPO's, Ancient Woodlands or Veteran trees on the Site.

4.22 The report also provides considerations for the design and site layout, stating that the current and future potential of tree growth should be considered. It also highlights the need to avoid any works to Root Protection Areas.

Heritage

4.23 A technical paper has been produced by TCMS Heritage which represents a high-level summary of Archaeology and Built Heritage evidence base at this preliminary stage. The report sets out the Key Opportunities and Constraints, Proposed Strategy and Conclusions.

4.24 In terms of Archaeology, the key opportunities and constraints include the Dumpdon Camp Scheduled Monument which is located c. 2.5 km to the north of the site and is considered a dominant feature in the wider landscape. The site is said to have a negligible potential for archaeological deposits dating to Prehistoric and early Medieval Periods, a medium potential for deposits from Roman and Medieval Periods, which would be of low significance if present, and a high potential for deposits from the post-Medieval Period.

4.25 In terms of Built Heritage, there are no designated heritage assets within the Site.

4.26 The site is said to have a negligible contribution to the overall setting of Dumpdon Hill Fort Scheduled Monument (1018851) due to its very small scale within the otherwise extensive landscape setting of the monument. The report recommends that a non-intrusive geophysical survey is carried out as well as appropriate mitigation measures for the retention of existing historic hedgerows and patterns of field drainage within the site. The application should be designed to include mitigation measures to minimise any direct/indirect impacts on significant heritage assets.

4.27 To conclude, the report states that the heritage constraints do not represent an overarching constraint to the development and that there is no heritage reason for the site not to be allocated within the emerging Local Plan.

Evolving Masterplan / Vision Document

4.28 A Vision Document has been prepared by Stantec to accompany these representations which sets out the proposed vision for the Site. The vision for the site is to provide a vibrant and sustainable new development to the east of the town of Honiton which is well integrated within the existing settlement and landscape setting. The document relays how the development will provide a logical extension to the Honiton while retaining and enhancing a network of green open spaces for the enjoyment of the wider community. The site will accommodate new homes in order to meet local housing demand, including that of affordable housing, with the opportunity to provide a new neighbourhood hub. The site will also have excellent local connections to the existing settlement, encouraging active travel offering ample opportunity for sustainable and local living.

4.29 The proposal supports a form of development that accords with the ecological hierarchy and by focusing on avoidance, mitigation and enhancement measures and can deliver biodiversity net gain.

Summary / Planning Benefits

4.30 The proposed development will deliver the following benefits:

- The provision of up to 115 dwellings on land north of the railway line and 285-300 dwellings on land south of the railway line, making efficient use of land and delivering a significant contribution to the Council's housing needs in the short to medium term;
 - The opportunity for the creation of significant areas of informal and formal public open space, including allotments, community park, play space and walking routes;
 - Delivery of a neighbourhood hub;
 - Delivery of ecological enhancements and on-site biodiversity net gain;
-
- The provision of attenuation basins to the south of the site offering a sustainable urban drainage system (SuDS) which also offer a habitat for aquatic wildlife; and
 - off-site improvements to highways, improving traffic flow and enhancing pedestrian and cycle connectivity for new and existing residents.

5.1 These representations and accompanying Technical Notes demonstrate that the current draft allocation at Land South of Northcote Hill – south of the railway line (GH/ED/39a), which restricts the development of the site to 100 homes, does not

constitute effective use of land or optimises the use of land to accommodate an appropriate amount and mix of development (in accordance with NPPF 2023; Paragraph 135e).

5.2 The Draft LP policy for land south of the railway line (GH/ED/39b) should be increased to 285-300 homes for the following reasons:

1. It would make efficient use of the site in accordance with national policy;
2. It would enable the site to support additional uses in the form of a community park and additional facilities such as a neighbourhood hub, as well as making a more meaningful contribution towards EDDC's housing land supply and meeting the housing needs of East Devon in a sustainable location;
3. The site is being promoted by a national housebuilder that is committed to delivering homes in the short-medium term – increasing the quantum of development on this allocation would ensure the draft LP delivers sufficient homes throughout the first part of the Plan period to meet its needs, noting the concerns raised regarding the delivery assumptions of the new settlement east of Exeter.

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.:

5.3 To ensure the draft LP makes the most efficient use of land the draft allocation should be revised as follows: Land south of Northcote Hill – south of the railway (GH/ED/39b)

This site is allocated for 300 homes and will form a medium-scale residential extension on the eastern side of Honiton. Parts of the site are on more elevated ground and development will need to be sensitively planned to avoid adverse impacts on the nearby Blackdown Hills National Landscape area. Vehicular and pedestrian access improvements would be required, incorporating Northcote Hill into development. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

2.54 We welcome the designation of Honiton as a Tier 2 settlement and a sustainable location for future growth and development.

2.55 It is welcomed that land south of Northcote Hill (north and south of the railway line) is identified as two draft allocations within the draft LP. Taylor Wimpey supports the allocations and can confirm that both sites are suitable and available for immediate development. Both sites can contribute to the Council's immediate housing land supply.

2.56 We discuss each of these allocation in turn below.

2.57 Land south of Northcote Hill (north of the railway line) (site reference - GH/ED/39a) – An outline planning permission was resolved to be approved on the allocation site by East Devon Planning Committee for the development of up to 115 homes, public open space, sustainable drainage systems, landscaping, vehicular access via Tunnel Lane and associated highways improvements and infrastructure. The proposed development was for up to 115 homes.

2.58 Land south of Northcote Hill (south of the railway line) (100 homes) (site reference – GH/ED/39b) – We support the allocation of the site for residential

development; and consider that the site has capacity for up to 285-300 homes. Taylor Wimpey have recently undertaken a full suite of technical work (summarised in section 4 of these representations) that confirms the site can comfortably accommodate a significantly higher quantum of development (285- 300 homes) which could deliver an extensive community park and other public benefits including a neighbourhood hub. The enclosed Vision Document demonstrates how a landscape-led development, with homes provided alongside extensive areas of public open space, including a new community park, can deliver 285-300 homes.

2.59 Taylor Wimpey welcomes the site's identification as an allocation within the draft LP and considers that the allocation has the potential to make a more significant contribution towards the district's housing land supply as shown on the masterplan submitted with these representations, alongside the delivery of additional public benefits for existing and future residents.

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.:

2.60 Taylor Wimpey request that the proposed allocation at Land south of Northcote Hill (south of the railway line) is uplifted to 285-300 homes to ensure the allocation makes the most efficient use of the site in accordance with National Policy and Guidance.

2.61 The draft LP policy should be amended accordingly, and draft revised policy wording has been provided at Section 5 of these representations.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

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Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: NPPF Transitional Arrangements

1.9 It is acknowledged that EDDC state that the Plan should be examined under the 2023 version of the NPPF, in line with the NPPF Transitional Arrangements set out at Paragraph 234a). This requires Regulation 19 Consultation to be reached before March 12th 2025, with a draft housing requirement that is at least 80% of the authority's Local Housing Need (LHN) figure.

Unpublished Evidence Base

1.10 It is evident, however, that this Regulation 19 Consultation does not include the full suite of evidence base, with the following documents noted as 'still to follow':

- CCF-001 - Water Cycle Study
- CCF-002 Strategic Flood Risk Assessment Surface Water Zone
- CCF-005 - Coastal Change Topic Paper
- HCO-004- Playing Pitch Strategy

- HCO-005 - Open Space Strategy
- HCO-006 - Sports Facilities Study
- HRD-004 - East Devon Heritage Strategy (2024-2042)

Two Phased Regulation 19 Consultation

1.11 Introductory text within this Draft LP also confirms that EDDC will be undertaking a second phase of Regulation 19 Consultation in Spring 2025, which will include additional detail regarding the new community (Strategic Policy WS01) and ‘other inter-related local plan matters’. The Draft LP proceeds to state, ‘once this evidence work is completed, and policy gaps in the plan can be filled in, and further policy refinement undertaken, the second phase of consultation will take place’.

1.12 It is evident that the new community is an integral part of the Draft LP strategy, and the delivery assumptions are fundamental to ensure EDDC achieve a housing requirement that is within 80% of their LHN figure. We raise significant concerns regarding EDDC’s approach in releasing piecemeal evidence that underpins this new community. It is evident that the approach to undertaking the Regulation 19 Local Plan in two parts is to allow EDDC to benefit from the NPPF Transitional Arrangements set out at Paragraph 234a). It is our view

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

1.1 These representations have been prepared by Boyer on behalf of Taylor Wimpey UK Ltd, in response to the East Devon District Council (EDDC) Local Plan (Regulation 19) Consultation Document (hereafter referred to as the “Draft LP”), in promotion of land off Northcote Hill, to the east of Honiton (the site).

1.2 Representations have been previously submitted as part of EDDC’s Regulation 18 Consultation undertaken in 2022, and the second Regulation 18 Consultation in 2024.

1.3 The site is dissected by the East Devon Railway Line into two parts, identified as Phase I (north of the railway line) and Phase II (south of the railway line). It is welcomed that both parts have been identified as allocations within the Draft LP:

- The land north of the railway line, which is proposed by the Council as a residential Local Plan allocation of approximately 100 homes; and referred to as ‘land north of Northcote Hill, north of the railway line’ (GH/ED/39a); and
- The land south of the railway, which is proposed by the Council as a residential Local Plan allocation of approximately 100 homes; and referred to as ‘land south of Northcote Hill, south of the railway line’ (GH/ED/39b).

1.6 Together, the site can create a sustainable new neighbourhood to the east of Honiton, providing approximately 400 homes. This includes 115 homes on land north of the railway line; and 285-300 homes on land south of it. By doing so, the proposed allocation would significantly contribute towards the Council’s housing land supply, in accordance with the Council’s spatial strategy.

Phase II Supporting Documentation

1.7 These representations should be read alongside the following technical reports, which support an increased quantum of development proposed for Phase II:

- Vision Document (prepared by Stantec) (which includes a concept masterplan for land north and south of the railway line);
- Tree Survey Report (prepared by RPS);
- Drainage Technical Note (prepared by Phoenix Design);
- Ecology Deliverability Report (prepared by EAD Ecology);

- Heritage Technical Note (prepared by TCMS);
- Landscape Visual Assessment (prepared by Stantec); and
- Transport Appraisal (prepared by TPA);

Test of Soundness

1.8 These representations respond to the relevant draft Local Plan policies, with particular consideration given to the NPPF's tests of soundness:

- Positively Prepared;
- Justified;
- Effective; and
- Consistent with National Policy

that this does not represent effective plan-making or the Government's objective to significantly boost the supply of homes.

1.13 The Draft LP in its current consultation form therefore fails to meet Section 19a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 as a copy of each of the submission documents has not been made available for consultation. It cannot therefore be considered that this Draft LP meets the definition of a comprehensive Regulation 19 Consultation.

1.14 Notwithstanding this, should this Draft LP be examined under the provisions of the previous NPPF (2023), these representations reference the soundness of this Draft LP against the requirements set out within the NPPF (2023).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1.4 We support the principle of both allocations; however, we strongly consider that the number of homes proposed for the land south of the railway line (Phase II) must be increased to 285- 300 homes. This increase is essential for ensuring that the allocation (and future scheme) makes effective use of the land and optimises its potential to accommodate an appropriate amount and mix of development as well as making a meaningful contribution towards meeting housing needs in East Devon (in accordance with NPPF 2023; Paragraph 135e).

1.5 Increasing the number of homes on land south of the railway line will enable the proposed development to offer more public benefits, such as a neighbourhood hub and significant public open space, potentially including a community park.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Obsidian Strategic Asset Management

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(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.:

Strategic Policy SD03: Honiton and its development allocations proposes to allocate the above site – Land at Kings Road, Honiton (Honi_18) – for residential development of 136 new homes

SITE PROMOTION HISTORY

The site was first promoted in response to the Further Draft Local Plan Consultation in June 2024 and subsequently considered by Strategic Planning Committee (SPC) on 29 October 2024 which resolved to allocate the site for about 136 homes, subject to confirmation from National Highways that the principle of an access can be achieved.

Prior to the final SPC meeting on 11 December 2024 to agree all proposed allocations ahead of the Regulation 19 consultation, confirmation was provided that an acceptable site access could be achieved following further discussions with DCC Highways. National Highways and the Police. The site was subsequently recommended for allocation.

Our client, Obsidian Strategic Asset Management (Obsidian), fully supports the allocation.

SPATIAL STRATEGY

Honiton is appropriately classified as a Main Centre and has an extensive range of services and facilities such that it has strategic significance as a location for higher levels of future housing development of the scale proposed in the emerging Local Plan.

ACCESS

The appended Highways Technical Note summarises the key highway discussions that have taken place regarding the site access. This demonstrates that a safe and acceptable site access that meets relevant standards can be secured with connection to the existing footways along Kings Road to provide pedestrian access into the town. The note also confirms that the identified Kings Road crossing can be provided.

The site is sustainably located in relation to the town with Honiton train station, providing links to Exeter, Axminster, Salisbury and London, located just 800m west of the site, with Honiton hospital and surgery immediately to the south of the train station. There is also an existing bus stop adjacent to the site at Kings Road and as referenced in the policy bus stops on Waterleat Avenue providing regular local services. Services and facilities along the High Street are within 0.6 miles of the site and schools, recreational facilities and the leisure centre are all within 1 mile of the site.

ENVIRONMENTAL DESIGNATION

Although the land lies adjacent to a National Landscape, the site itself is not subject to any statutory environmental designation.

The site is located to the east of Honiton, outside but adjacent to the current settlement boundary. The land also lies adjacent to the East Devon and Blackdown Hills National Landscapes.

While indicative at this stage the Concept Design has been prepared to provide a sensitive development that allows for a new edge of settlement built form that is appropriate to its setting with significant areas of open space and landscaping around the periphery of the development to assist with the assimilation to the National

Landscape, whilst also providing sustainable urban drainage and biodiversity net gain benefits.

An illustrative concept plan demonstrating how the site could be developed is appended.

TREE COVER

There is very limited tree cover on the site, and it would be expected that the existing trees could be retained in situ as part of any development proposal. Within the site are two field boundary hedgerows and the concept plan demonstrates that these hedgerows could be retained and enhanced, forming a central part of a scheme by lining the proposed main street.

CONTAMINATION

The site has been in agricultural use and there are no known contaminants on the site at this stage of investigation.

INFRASTRUCTURE

Following a preliminary review of the site and its opportunities and constraints, it is expected that the site can comfortably accommodate the identified allocation numbers. As set out above a new highway access will be required off the A35 which is envisaged to be a right turn lane junction.

The site is suitable for development of market homes and affordable homes in line with emerging policy contained within the East Devon Draft Local Plan.

DELIVERABILITY

The site under the control of a willing landowner, as evidenced by the active site promotion undertaken to date, such that it can come forward for development early in the local plan period. Initial site assessment and feasibility work has not identified any constraints that would preclude development of the site.

While only preliminary design work has been carried out to date, this demonstrates that the site can readily accommodate the identified development quantum with a sensitive scheme appropriate to its edge of settlement setting. Significant areas of open space and landscaping can be accommodated around the periphery of the development area to assist with mitigating views from the adjacent National Landscape, whilst also providing sustainable urban drainage and biodiversity net gain benefits.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Taylor Wimpey Exeter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Site Allocation Taylor Wimpey strongly supports the allocation of Land at Ottery Moor Lane (Honi-10) for residential development. Policies There are a number of policies that impose technical and other standards that while entirely laudable but have not been properly evidenced or justified and as such are, in themselves, unsound. Cumulative these policies could hinder housing delivery by placing undue burdens on developers and landowners and affecting scheme viability.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Taylor Wimpey Exeter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Taylor Wimpey fully endorses the allocation of site Honi_10. Honiton is appropriately classified as a Main Centre and has an extensive range of services and facilities such that it has strategic significance as a location for higher levels of future housing development of the scale proposed in the emerging Local Plan. The site has recently obtained a Committee resolution to approve, subject to a Section 106 agreement, demonstrating it is fully deliverable. The site can make a small but nonetheless important contribution to housing delivery in the early part of the plan period.

Full name: Laura Grimason

Organisation (where relevant): Gillings Planning

Other party name (if relevant): Frontier Estates Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Whilst my client is supportive of SD03, HONI__06 as an allocation, it is respectfully requested that the following comments on the detail of this allocation policy are reflected in the plan as it progresses towards adoption. The main change that is requested is to include an allowance for the provision of a care home for the elderly in the allocation policy as an alternative to the 30 homes that are specified at present. Care homes provide a specialist type of residential accommodation and fall within Class C2 (residential institutions) as opposed to Class C3 (dwellinghouses). Pre-application discussions have been positive in confirming that the principle of a care home on this site is acceptable and the adopted local plan sets out support for Class C2 uses on sites allocated for residential development. The pre-app submission also indicates that a 68-bed care home can be comfortably accommodated on this site, representing the efficient use of previously developed land in a highly sustainable location. It is also noted that the provision of a 68-bed care home on this site could contribute the equivalent of 38 dwellings on this site applying the 1.8 ratio for communal accommodation specified in the Housing Delivery Test calculation whilst also contributing to the creation of sustainable and balanced communities in response to local need, a key aspiration of the emerging plan. As such, it is respectfully requested that the wording of the policy is amended to reflect this and to include an option for a care home. The suggested wording below would provide additional flexibility to allow for the delivery of a care home on this site in order to assist with the creation of sustainable and balanced communities. The suggested alternative wording for SD03, HONI__06 is as follows: 'Former Millwater School at Honiton Bottom Road (Honi_06) This land is allocated for a care home for the elderly (Use Class C2) or 30 homes and will form a smallscale development in the southern part of Honiton'

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To discuss in detail requested changes set out in letter

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As we have set out above, we still consider the proposed housing provision at Honiton is too low and the opportunity to bring sites forward that maximise the opportunity to deliver housing earlier in the Plan period should be further considered. As the Regulation 18 and 19 site selection processes has identified there is significant capacity at Honiton for a range of smaller sites to come forward that can benefit from existing infrastructure and accessibility.

Land at Heathfield Manor (previously Honi 15)

Our clients' site at Heathfield Manor represents such an opportunity which regrettably was not given proper consideration during the site selection process, largely over confusion regarding the extent of the site being considered and errors in the paperwork. We firmly believe that in those circumstances the site was not given proper consideration.

The facts of the case are that part of the site was identified as a draft allocation (reference Honi_01) in the Regulation 18 Plan. This was on the basis that HELAA identified that the site did not present any inherent issue from a highway, flood risk, biodiversity, heritage and accessibility perspective. The site's location within the National Landscape was acknowledged and identified as a sensitivity, although the draft allocation confirms that this did not preclude a sensitively designed scheme. The

Panel considered the site to be achievable for housing with an identified yield of around 79 dwellings. The site was also considered available and deliverable within the first 5 years of the Local Plan period.

The Honi_01 site was therefore fully tested, assessed and consulted upon as part of its identification as proposed allocation at the Regulation Stage and recognised as beneficial to the strategy for Honiton. This should have been an important starting point for the site when the Regulation 19 sites selection process commenced. However as outlined below, this actually accounted for nothing with ultimately the site being removed for no reason and with no justification. Regardless ultimately of the consideration of the wider site (Honi_15), which as we set out below was also significantly flawed, Honi_01 should have been considered on its own merits and in the context of it having been previously identified as a proposed allocation and the support the evidence base provided for it at that stage.

We made further representations regarding the site as part of the further Regulation 18 consultation held between May and June 2024 which set out the benefits of a wider scheme extending across 3 field parcels instead of the previously proposed one. This wider site had been considered under the 2022 call for sites exercise and the HELAA Panel (under reference Honi_15) subsequently concluded the site could be achievable for housing with a potential yield of 133 dwellings, with no inherent issues identified from a highways, flood risk, biodiversity, heritage and accessibility perspective.

In our representations in June 2024, we set out how the extended site will support greater opportunity for a landscaped driven development that can integrate and assimilate with the existing landscaped character to form a high-quality development. This would be achieved through a more logical extension to the southwestern part of Honiton, effectively filling in the gap between Hayne Lane and the A375 and rounding off the urban area. At the same time providing a better assimilation of development with the National Landscape through a wide network of green space and green corridors, public open space, extensive landscape features and blue infrastructure. It would provide a more effective approach toward managing landscape harm and provide the opportunity for significant enhancement. This is a clear benefit of the wider scheme.

To support the wider site's inclusion further a Framework Masterplan was prepared and submitted to the Council which identified clear opportunities for landscape and habitat enhancement that would provide substantial benefit in enhancing the transition from

the National Landscape and the urban form of Honiton and significantly improve the current relationship and landscape setting. I attach a copy of the site location plan at Appendix 1 and the Framework Masterplan at Appendix 2.

It seems quite clear that sensitive development of the wider site would provide and fund important mitigation and enhancement, whilst delivering the wider benefits of growth for the local community. It would deliver more housing in a sustainable location to support the role of Honiton and is a site that is relatively unconstrained nor overburdened by infrastructure requirements. The site can therefore come forward quickly to support delivery in the earlier stages of the Plan period and provide much needed resilience to the Plan's strategy.

Despite these clear benefits which were supported by the officers who originally recommended allocation of Honi_15 within the Regulation 19 Plan, the site selection report recommending this was withdrawn a few days prior to the Strategic Planning Committee's (SPC) consideration and replaced with a report that only identified the partial site of Honi_01 although it was still referred to as Honi_15 and included a number of inconsistencies. I have attached extracts from both the report that was withdrawn, and the subsequent amended report relied upon by Members at the SPC for reference at Appendices 3 and 4 respectively. On raising this with the policy team (importantly officers did not directly inform of us of this change) we were advised that the report had been amended because the wider site had not been subject to previous consultation and instead "the inclusion of these additional parcels requires further consideration and will be reported on separately to a future meeting as appropriate."

However, this further consideration never took place, instead the SPC debate including public comment was simply confused as to what was being considered, Honi_01 or Honi_15 and suggestions that we had acted unreasonably in seeking to extend the site through the consultation, when it was clearly an error by the Council. The upshot was that not only was Honi_15 not given any proper consideration nor a further discussion arranged to do so as had been advised, but Honi_01 was withdrawn from the Plan, despite its earlier allocation. The only reason put forward was the site's location within the National Landscape despite this clearly being the same situation as before and other sites subsequently being included in the Plan also falling within the National Landscape.

The boundary of the National Landscape does not follow the settlement boundary and there is already significant parts of Honiton that falls within the boundary of the National Landscape designation. It is clearly not a principle reason for excluding sites within this context and as set out above development does provide opportunities to improve the relationship between existing urban areas and National Landscape coverage. Not only are other sites at Honiton allocated within the extent of the National Landscape boundaries, but sites across the District have also been allocated, including Exmouth and Sidmouth, but also including lower order settlements such as Newton Poppleford and Sidbury etc. Clearly if this is not a principle reason to exclude sites in those lower tier places then it would be unreasonable to rule sites out at Honiton given the town's greater role for accommodating growth.

The removal of the Heathfield Manor site from the Plan is a significant lost opportunity and there were and are no good reasons for it not to have been allocated, particularly given it provides a more logical southern extension of Honiton than other more constrained sites that have been included in the Plan to the east and west which are far less well related to the existing urban area to the site at Heathfield Manor.

We consider the above matters have significantly prejudiced the consideration of the site both partially (Honi_01) and the wider area (Honi_15). At the very least given the support through the process for Honi_01 this should be added back into the Plan. However given the inevitable challenges the District will face in delivering its housing requirements and the clear benefits of the wider scheme there are clear grounds for allocating Honi_15.

In that context we make the following comments on the sites allocated in Policy SD03:

Land west of Hayne Lane (Gitti_03,04 and 05)

Our clients are concerned that the allocation of this site was based primarily on quantum and capacity rather than a consideration of relevant matters in respect of deliverability. It also a site that is distant from the core facilities of the town and accessibility during the site selection process was described as challenging. Part of the site also falls within the National Landscape, demonstrating that this does not appear to be the principle for ruling out sites as suggested in the context of Heathfield Manor.

The wording of the allocation makes it clear that there will be access issues to be addressed as well as landscape and heritage sensitivity alongside the need for the site to come forward in a masterplan dealing with the site comprehensively and the provision of significant infrastructure.

All this points to a site that will take some time to come forward. Whilst not suggesting the site should not be allocated, it is unlikely to make a significant contribution to housing delivery in the early parts of the Plan period. On that basis it is clearly a more sustainable strategy to deliver a range of sites which provide good access and connectivity options to existing services and facilities whilst offering opportunities for enhancement of existing infrastructure to support the growth of the town. This will also be more beneficial in ensuring the Plan is resilient in meeting housing needs at an early stage of the Plan period.

Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi_07 and Honi_12)

As with Heathfield Manor, this site lies within the National Landscape but is closer to heritage assets and is also a less logical extension to the urban area in respect of form. The site's allocation is inconsistent with the decision to not allocate Heathfield Manor. Honi_12 was not recommended to be allocated by officers.

Land south of Northcote Hill (GH/ED/39a and b)

These allocations represent a significant extension eastward of the town with both access and accessibility challenges with access to the site constrained by narrow roads under railway bridges. Significant improvements will be required. Again given these sensitivities the site is unlikely to make a significant contribution to housing delivery in the early parts of the Plan period.

Based on the inclusion of the above sites, there are no good reasons for the Plan not to allocate the Heathfield Manor site. It is a site that is relatively unconstrained nor overburdened by infrastructure requirements. The site can come forward quickly to support delivery in the earlier stages of the Plan period and provide much needed resilience to the Plan's strategy. Without having a range of sites within Honiton the Plan

will over rely on more constrained sites which are more difficult to bring forward, particularly given the significant uncertainties around deliverability.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

We believe further growth at Honiton should be provided for through the allocation of further sites. This will underpin the Plan's strategy to ensure sufficient housing growth in the town throughout the Plan period, including at an early stage. The site at Heathfield Manor is unconstrained and has previously been identified as a preferred choice site based on its suitability. There are no impediments to its delivery and as such it can make an important contribution to the Plan.

Policy SD03 should therefore be modified to include land at Heathfield Manor (Honi_15) as an allocation.

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 elaborate on these and previous representations made on the Plan

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

(PCL Planning on behalf of Waddeton Park Limited (Honiton)): As we have set out [elsewhere], we still consider the proposed housing provision at Honiton is too low and the opportunity to bring sites forward that maximise the opportunity to deliver housing earlier in the Plan period should be further considered. As the Regulation 18 and 19 site selection processes has identified there is significant capacity at Honiton for a range of smaller sites to come forward that can benefit from existing infrastructure and accessibility.

Land at Heathfield Manor (previously Honi 15): Our clients' site at Heathfield Manor represents such an opportunity which regrettably was not given proper consideration during the site selection process, largely over confusion regarding the extent of the site being considered and errors in the paperwork. We firmly believe that in those circumstances the site was not given proper consideration.

The facts of the case are that part of the site was identified as a draft allocation (reference Honi_01) in the Regulation 18 Plan. This was on the basis that HELAA identified that the site did not present any inherent issue from a highway, flood risk, biodiversity, heritage and accessibility perspective. The site's location within the National Landscape was acknowledged and identified as a sensitivity, although the draft allocation confirms that this did not preclude a sensitively designed scheme. The Panel considered the site to be achievable for housing with an identified yield of around

79 dwellings. The site was also considered available and deliverable within the first 5 years of the Local Plan period.

The Honi_01 site was therefore fully tested, assessed and consulted upon as part of its identification as proposed allocation at the Regulation Stage and recognised as beneficial to the strategy for Honiton. This should have been an important starting point for the site when the Regulation 19 sites selection process commenced. However as outlined below, this actually accounted for nothing with ultimately the site being removed for no reason and with no justification. Regardless ultimately of the consideration of the wider site (Honi_15), which as we set out below was also significantly flawed, Honi_01 should have been considered on its own merits and in the context of it having been previously identified as a proposed allocation and the support the evidence base provided for it at that stage.

We made further representations regarding the site as part of the further Regulation 18 consultation held between May and June 2024 which set out the benefits of a wider scheme extending across 3 field parcels instead of the previously proposed one. This wider site had been considered under the 2022 call for sites exercise and the HELAA Panel (under reference Honi_15) subsequently concluded the site could be achievable for housing with a potential yield of 133 dwellings, with no inherent issues identified from a highways, flood risk, biodiversity, heritage and accessibility perspective.

In our representations in June 2024, we set out how the extended site will support greater opportunity for a landscaped driven development that can integrate and assimilate with the existing landscaped character to form a high-quality development. This would be achieved through a more logical extension to the southwestern part of Honiton, effectively filling in the gap between Hayne Lane and the A375 and rounding off the urban area. At the same time providing a better assimilation of development with the National Landscape through a wide network of green space and green corridors, public open space, extensive landscape features and blue infrastructure. It would provide a more effective approach toward managing landscape harm and provide the opportunity for significant enhancement. This is a clear benefit of the wider scheme.

To support the wider site's inclusion further a Framework Masterplan was prepared and submitted to the Council which identified clear opportunities for landscape and habitat enhancement that would provide substantial benefit in enhancing the transition from the National Landscape and the urban from of Honiton and significantly improve the

current relationship and landscape setting. I attach a copy of the site location plan at Appendix 1 and the Framework Masterplan at Appendix 2.

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The boundary of the National Landscape does not follow the settlement boundary and there is already significant parts of Honiton that falls within the boundary of the National Landscape designation. It is clearly not a principle reason for excluding sites within this context and as set out above development does provide opportunities to

improve the relationship between existing urban areas and National Landscape coverage. Not only are other sites at Honiton allocated within the extent of the National Landscape boundaries, but sites across the District have also been allocated, including Exmouth and Sidmouth, but also including lower order settlements such as Newton Poppleford and Sidbury etc. Clearly if this is not a principle reason to exclude sites in those lower tier places then it would be unreasonable to rule sites out at Honiton given the town's greater role for accommodating growth.

The removal of the Heathfield Manor site from the Plan is a significant lost opportunity and there were and are no good reasons for it not to have been allocated, particularly given it provides a more logical southern extension of Honiton than other more constrained sites that have been included in the Plan to the east and west which are far less well related to the existing urban area to the site at Heathfield Manor.

We consider the above matters have significantly prejudiced the consideration of the site both partially (Honi_01) and the wider area (Honi_15). At the very least given the support through the process for Honi_01 this should be added back into the Plan. However given the inevitable challenges the District will face in delivering its housing requirements and the clear benefits of the wider scheme there are clear grounds for allocating Honi_15.

In that context we make the following comments on the sites allocated in Policy SD03:

Land west of Hayne Lane (Gitti_03,04 and 05) Our clients are concerned that the allocation of this site was based primarily on quantum and capacity rather than a consideration of relevant matters in respect of deliverability. It also a site that is distant from the core facilities of the town and accessibility during the site selection process was described as challenging. Part of the site also falls within the National Landscape, demonstrating that this does not appear to be a principle for ruling out sites as suggested in the context of Heathfield Manor.

The wording of the allocation makes it clear that there will be access issues to be addressed as well as landscape and heritage sensitivity alongside the need for the site to come forward in a masterplan dealing with the site comprehensively and the provision of significant infrastructure.

All this points to a site that will take some time to come forward. Whilst not suggesting the site should not be allocated, it is unlikely to make a significant contribution to housing delivery in the early parts of the Plan period. On that basis it is clearly a more sustainable strategy to deliver a range of sites which provide good access and connectivity options to existing services and facilities whilst offering opportunities for enhancement of existing infrastructure to support the growth of the town. This will also be more beneficial in ensuring the Plan is resilient in meeting housing needs at an early stage of the Plan period.

Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi_07 and Honi_12) As with Heathfield Manor, this site lies within the National Landscape but is closer to heritage assets and is also a less logical extension to the urban area in respect of form. The site's allocation is inconsistent with the decision to not allocate Heathfield Manor. Honi_12 was not recommended to be allocated by officers.

Land south of Northcote Hill (GH/ED/39a and b) These allocations represent a significant extension eastward of the town with both access and accessibility challenges with access to the site constrained by narrow roads under railway bridges. Significant improvements will be required. Again given these sensitivities the site is unlikely to make a significant contribution to housing delivery in the early parts of the Plan period.

Based on the inclusion of the above sites, there are no good reasons for the Plan not to allocate the Heathfield Manor site. It is a site that is relatively unconstrained nor overburdened by infrastructure requirements. The site can come forward quickly to support delivery in the earlier stages of the Plan period and provide much needed resilience to the Plan's strategy. Without having a range of sites within Honiton the Plan will over rely on more constrained sites which are more difficult to bring forward, particularly given the significant uncertainties around deliverability.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We believe further

growth at Honiton should be provided for through the allocation of further sites. This will underpin the Plan's strategy to ensure sufficient housing growth in the town throughout the Plan period, including at an early stage. The site at Heathfield Manor is unconstrained and has previously been identified as a preferred choice site based on its suitability. There are no impediments to its delivery and as such it can make an important contribution to the Plan. Policy SD03 should therefore be modified to include land at Heathfield Manor (Honi_15) as an allocation.

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.: in order to provide greater elaboration of the detail of these representations

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Chapter 5 – Development in the Towns and Villages

Policy SD03: Honiton and its development allocations

As we have set out above, we still consider the proposed housing provision at Honiton is too low and the opportunity to bring sites forward that maximise the opportunity to deliver housing earlier in the Plan period should be further considered. As the Regulation 18 and 19 site selection processes has identified there is significant capacity at Honiton for a range of smaller sites to come forward that can benefit from existing infrastructure and accessibility.

Land at Heathfield Manor (previously Honi 15)

Our clients' site at Heathfield Manor represents such an opportunity which regrettably was not given proper consideration during the site selection process, largely over confusion regarding the extent of the site being considered and errors in the paperwork. We firmly believe that in those circumstances the site was not given proper consideration.

The facts of the case are that part of the site was identified as a draft allocation (reference Honi_01) in the Regulation 18 Plan. This was on the basis that HELAA identified that the site did not present any inherent issue from a highway, flood risk, biodiversity, heritage and accessibility perspective. The site's location within the National Landscape was acknowledged and identified as a sensitivity, although the draft allocation confirms that this did not preclude a sensitively designed scheme. The Panel considered the site to be achievable for housing with an identified yield of around 79 dwellings. The site was also considered available and deliverable within the first 5 years of the Local Plan period.

The Honi_01 site was therefore fully tested, assessed and consulted upon as part of its identification as proposed allocation at the Regulation Stage and recognised as beneficial to the strategy for Honiton. This should have been an important starting point for the site when the Regulation 19 sites selection process commenced. However as outlined below, this actually accounted for nothing with ultimately the site being removed for no reason and with no justification. Regardless ultimately of the consideration of the wider site (Honi_15), which as we set out below was also significantly flawed, Honi_01 should have been considered on its own merits and in the context of it having been previously identified as a proposed allocation and the support the evidence base provided for it at that stage.

We made further representations regarding the site as part of the further Regulation 18 consultation held between May and June 2024 which set out the benefits of a wider scheme extending across 3 field parcels instead of the previously proposed one. This wider site had been considered under the 2022 call for sites exercise and the HELAA Panel (under reference Honi_15) subsequently concluded the site could be achievable for housing with a potential yield of 133 dwellings, with no inherent issues identified from a highways, flood risk, biodiversity, heritage and accessibility perspective.

In our representations in June 2024, we set out how the extended site will support greater opportunity for a landscaped driven development that can integrate and assimilate with the existing landscaped character to form a high-quality development. This would be achieved through a more logical extension to the southwestern part of Honiton, effectively filling in the gap between Hayne Lane and the A375 and rounding off the urban area. At the same time providing a better assimilation of development with the National Landscape through a wide network of green space and green corridors, public open space, extensive landscape features and blue infrastructure. It would

provide a more effective approach toward managing landscape harm and provide the opportunity for significant enhancement. This is a clear benefit of the wider scheme.

To support the wider site's inclusion further a Framework Masterplan was prepared and submitted to the Council which identified clear opportunities for landscape and habitat enhancement that would provide substantial benefit in enhancing the transition from the National Landscape and the urban form of Honiton and significantly improve the current relationship and landscape setting. I attach a copy of the site location plan at Appendix 1 and the Framework Masterplan at Appendix 2.

It seems quite clear that sensitive development of the wider site would provide and fund important mitigation and enhancement, whilst delivering the wider benefits of growth for the local community. It would deliver more housing in a sustainable location to support the role of Honiton and is a site that is relatively unconstrained nor overburdened by infrastructure requirements. The site can therefore come forward quickly to support delivery in the earlier stages of the Plan period and provide much needed resilience to the Plan's strategy.

Despite these clear benefits which were supported by the officers who originally recommended allocation of Honi_15 within the Regulation 19 Plan, the site selection report recommending this was withdrawn a few days prior to the Strategic Planning Committee's (SPC) consideration and replaced with a report that only identified the partial site of Honi_01 although it was still referred to as Honi_15 and included a number of inconsistencies. I have attached extracts from both the report that was withdrawn, and the subsequent amended report relied upon by Members at the SPC for reference at Appendices 3 and 4 respectively. On raising this with the policy team (importantly officers did not directly inform of us of this change) we were advised that the report had been amended because the wider site had not been subject to previous consultation and instead "the inclusion of these additional parcels requires further consideration and will be reported on separately to a future meeting as appropriate."

However, this further consideration never took place, instead the SPC debate including public comment was simply confused as to what was being considered, Honi_01 or Honi_15 and suggestions that we had acted unreasonably in seeking to extend the site through the consultation, when it was clearly an error by the Council. The upshot was that not only was Honi_15 not given any proper consideration nor a further discussion arranged to do so as had been advised, but Honi_01 was withdrawn from the Plan,

despite its earlier allocation. The only reason put forward was the site's location within the National Landscape despite this clearly being the same situation as before and other sites subsequently being included in the Plan also falling within the National Landscape.

The boundary of the National Landscape does not follow the settlement boundary and there is already significant parts of Honiton that falls within the boundary of the National Landscape designation. It is clearly not a principle reason for excluding sites within this context and as set out above development does provide opportunities to improve the relationship between existing urban areas and National Landscape coverage. Not only are other sites at Honiton allocated within the extent of the National Landscape boundaries, but sites across the District have also been allocated, including Exmouth and Sidmouth, but also including lower order settlements such as Newton Poppleford and Sidbury etc. Clearly if this is not a principle reason to exclude sites in those lower tier places then it would be unreasonable to rule sites out at Honiton given the town's greater role for accommodating growth.

The removal of the Heathfield Manor site from the Plan is a significant lost opportunity and there were and are no good reasons for it not to have been allocated, particularly given it provides a more logical southern extension of Honiton than other more constrained sites that have been included in the Plan to the east and west which are far less well related to the existing urban area to the site at Heathfield Manor.

We consider the above matters have significantly prejudiced the consideration of the site both partially (Honi_01) and the wider area (Honi_15). At the very least given the support through the process for Honi_01 this should be added back into the Plan. However given the inevitable challenges the District will face in delivering its housing requirements and the clear benefits of the wider scheme there are clear grounds for allocating Honi_15.

In that context we make the following comments on the sites allocated in Policy SD03:

Land west of Hayne Lane (Gitti_03,04 and 05)

Our clients are concerned that the allocation of this site was based primarily on quantum and capacity rather than a consideration of relevant matters in respect of deliverability. It also a site that is distant from the core facilities of the town and accessibility during the site selection process was described as challenging. Part of the site also falls within the National Landscape, demonstrating that this does not appear to be the principle for ruling out sites as suggested in the context of Heathfield Manor.

The wording of the allocation makes it clear that there will be access issues to be addressed as well as landscape and heritage sensitivity alongside the need for the site to come forward in a masterplan dealing with the site comprehensively and the provision of significant infrastructure.

All this points to a site that will take some time to come forward. Whilst not suggesting the site should not be allocated, it is unlikely to make a significant contribution to housing delivery in the early parts of the Plan period. On that basis it is clearly a more sustainable strategy to deliver a range of sites which provide good access and connectivity options to existing services and facilities whilst offering opportunities for enhancement of existing infrastructure to support the growth of the town. This will also be more beneficial in ensuring the Plan is resilient in meeting housing needs at an early stage of the Plan period.

Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi_07 and Honi_12)

As with Heathfield Manor, this site lies within the National Landscape but is closer to heritage assets and is also a less logical extension to the urban area in respect of form. The site's allocation is inconsistent with the decision to not allocate Heathfield Manor. Honi_12 was not recommended to be allocated by officers.

Land south of Northcote Hill (GH/ED/39a and b)

These allocations represent a significant extension eastward of the town with both access and accessibility challenges with access to the site constrained by narrow roads under railway bridges. Significant improvements will be required. Again given these

sensitivities the site is unlikely to make a significant contribution to housing delivery in the early parts of the Plan period.

Based on the inclusion of the above sites, there are no good reasons for the Plan not to allocate the Heathfield Manor site. It is a site that is relatively unconstrained nor overburdened by infrastructure requirements. The site can come forward quickly to support delivery in the earlier stages of the Plan period and provide much needed resilience to the Plan's strategy. Without having a range of sites within Honiton the Plan will over rely on more constrained sites which are more difficult to bring forward, particularly given the significant uncertainties around deliverability.

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.: Modification required

We believe further growth at Honiton should be provided for through the allocation of further sites. This will underpin the Plan's strategy to ensure sufficient housing growth in the town throughout the Plan period, including at an early stage. The site at Heathfield Manor is unconstrained and has previously been identified as a preferred choice site based on its suitability. There are no impediments to its delivery and as such it can make an important contribution to the Plan.

Policy SD03 should therefore be modified to include land at Heathfield Manor (Honi_15) as an allocation.

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 elaborate on the concerns raised within in these and earlier representations on the Plan

Full name: Richard Bailey

Organisation (where relevant): Stags

Other party name (if relevant): Hobart Land Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic policy SD03 details the allocation made for Honiton and these allocations provide for a total of 839 dwellings at the town (including completions). There is no reference to sports pitches being provided as part of any of the allocations. The current Playing Pitch Strategy for Honiton (February 2017) set out plan to deliver additional playing pitches for the town. This included the provision of five rugby pitches at the former showground site plus football or cricket pitch provision at St Rita's. It is acknowledged that the Playing Pitch Strategy for the District is being reviewed at present and that is to be issued Spring/ Summer this year, however, it is notable that none of the additional pitch provision identified in the 2017 pitch strategy for Honiton has been delivered. In this context, and given the earlier comments about bolstering the allocated land for housing delivery, we consider that the land at the former showground site provides a good opportunity to deliver a mixed use residential and sports development on the edge of Honiton. This would assist in addressing both the need for more sports pitches and housing. If the former showground site was included in this then the total supply could be increased to approximately 988, as well as securing the delivery of 4 junior rugby sports pitches. This would be a positive addition to the development strategy for the town. The site is located in an accessible location approximately 900 metres from the town centre. This is a reasonable walking and cycling distance. Also, the site has an existing access on Langford Road which can be improved as necessary alongside other highway improvements, such as pedestrian crossing, extended footway and cycle route facilities, to provide improved connections. The former showground site is available, suitable and achievable (as the findings of the HELAA [November 2022] found with regard to the part submitted for assessment - Honi_9) and could be developed with limited adverse impacts, it appears that there is reasonable alternative to the current strategy that would help further to ensure that the necessary minimum

levels of housing are achieved and exceeded, and that some playing pitch provision for the town of Honiton is delivered.

Full name: Ben Luxton

Organisation (where relevant): Stags

Other party name (if relevant): Mr Wilfred and Mrs Elizabeth Tratt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Please refer to the attached correspondence.

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.: Please refer to the attached correspondence.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Please refer to the attached correspondence.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached correspondence.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Please refer to the attached correspondence.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Adamson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I would like to add the following comments to my previous objection on this matter.

The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers.

In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrook, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton.

Allocation Reference Gitti_03 and Gitti_04

I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for more than 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be unsurmountable. If the site cannot come forward within the plan period for development, then it should not be allocated.

- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development.
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village.
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation.
- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting.
- This employment allocation of 14.6ha is significantly more than what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha.
- Any viability concerns must not be an over-riding justification for bad planning.
- The “local need” for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark.

- The development would result in the unnecessary loss of high quality, productive agricultural land.
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road.
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment.
- The biodiversity qualities of the existing landscape will be seriously compromised.
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH – RESIDENTIAL

I OBJECT to the proposed allocation Gitti_05.

The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria.
- The detrimental impact development will have on the setting of Gittisham Village and its conservation area.
- Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the National Landscape.
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.
- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will also be detrimental to vehicular and pedestrian safety.
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to remain so.
- Highways, sewers, sewage treatment and surface water infrastructure are already at capacity.

- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors' surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria recommend no greater distance than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is poor.
- The development would result in the unnecessary loss of high quality, productive agricultural land, which has already been ravaged by the development of the Hayne Lane estate.
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment.
- The biodiversity qualities of the existing landscape will be seriously compromised.

- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- There is a lack of provision of any accessible community facilities to serve this isolated community, a need which cannot be overcome, either in the short, medium or even long term.
- This development amounts to the rape of our countryside for purely monetary gain and has nothing to do with satisfying the housing needs of the community of Honiton.

Full name: Richard Bailey

Other party name (if relevant): Hobart Land Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic policy SD03 details the allocation made for Honiton and these allocations provide for a total of 839 dwellings at the town (including completions). There is no reference to sports pitches being provided as part of any of the allocations.

The current Playing Pitch Strategy for Honiton (February 2017) set out plan to deliver additional playing pitches for the town. This included the provision of five rugby pitches at the former showground site plus football or cricket pitch provision at St Rita's. It is acknowledged that the Playing Pitch Strategy for the District is being reviewed at present and that is to be issued Spring/ Summer this year, however, it is notable that none of the additional pitch provision identified in the 2017 pitch strategy for Honiton has been delivered.

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.:

In this context, and given the earlier comments about bolstering the allocated land for housing delivery, we consider that the land at the former showground site provides a good opportunity to deliver a mixed use residential and sports development on the edge of Honiton. This would assist in addressing both the need for more sports pitches and housing. If the former showground site was included in this then the total supply could be increased to approximately 988, as well as securing the delivery of 4 junior rugby sports pitches. This would be a positive addition to the development strategy for the town.

The site is located in an accessible location approximately 900 metres from the town centre. This is a reasonable walking and cycling distance. Also, the site has an existing access on Langford Road which can be improved as necessary alongside other highway improvements, such as pedestrian crossing, extended footway and cycle route facilities, to provide improved connections.

The former showground site is available, suitable and achievable (as the findings of the HELAA [November 2022] found with regard to the part submitted for assessment - Honi_9) and could be developed with limited adverse impacts, it appears that there is reasonable alternative to the current

strategy that would help further to ensure that the necessary minimum levels of housing are achieved and exceeded, and that some playing pitch provision for the town of Honiton is delivered.

In summary, we support the emerging Spatial Strategy in terms of the direction of growth to the Main Centres, however, we suggest that the Council could pursue a better alternative strategy with regard to the housing target and meeting the full housing need based on the revised NPPF, and bolstering the identified supply of land for housing to ensure that the minimum target is achieved and exceeded.

Full name: Carolyn Bowles

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am very concerned to see that there are housing sites being allocated to Honiton which were not in the original consultation, particularly the site near Church Hill which I believe was originally rejected as a site for housing. This area is used frequently by local residents for walking as there is a public footpath which runs through the fields and it would be awful if these fields were lost.

The fact that it is stated in the Local Plan that one of the key points is to protect the natural environment is clearly a ludicrous statement when so much of the beautiful countryside is being lost to development, housing development is, I believe one of the worst things to affect the environment, your certainly not saving it. I would also have thought that many tourists come to Devon particularly to visit the countryside and not endless housing estates, the houses on which are crammed in for maximum profit by the developers and do not provide adequate space for gardens and parking for new residents.

The best thing that you could for East Devon would be to not build anymore housing at all, there seems to be quite a lot of derelict/empty properties about which could be restored.

All of this housing impacts on the local infrastructure, you can hardly get to see a doctor or national health dentist as it is, will you be expanding local schools, opening the hospital beds that were shut some years ago at Honiton Hospital or do we all still have to rely on the RD & E at Exeter. I know there has been talk that a new sewage works will be needed to cope with the extra waste, what about all the extra water needed to supply all these houses. How many more cars and people do you want to pack into East Devon, I will be surprised if there is a single blade of grass left soon. From one very displeased local pensioner who has lived her nearly all of my life.

Full name: Nick Chapman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be unsurmountable. If the site cannot come forward within the plan period for development then it should not be allocated.
- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation
- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting

- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha
- Any viability concerns must not be an over-riding justification for bad planning
- The “local need” for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH - RESIDENTIAL I OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria;
- Development will have a direct and serious detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will affect public safety negatively.
- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;

- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue to be so;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is extremely poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

Full name: RF Collins, LA Collins and FHW Collins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Honi_18 was a very late addition, should never have been allowed to go forward as it wasn't consulted on at reg 18 stage. Honiton Town Council or general public were not informed of this plan. There is a conflict of interest with agent Carter Jonas and Highways England and SLR and Highways England Carter Jonas are land agents for Highways England. SLR are road design planners for Highways England. My family have farmed Lambpark field for over 35 years. Access will be very dangerous if we have to cross a 3 lane road with tractor and the trailer is 24 foot long. Gateway is in the northeast corner of field. Please see map. Footpaths Hale Farm 12.13.14.15. Footpath 12 runs in next field to Honi_18. Footpath 15 runs from Hale farm up High to Springfield Road at the moment people have restricted views of open countryside. When we had lockdown covid 19 we counted 45 walkers in a four and a half hour period. RSPB bird survey a few years ago found many species of high conservation concern. Hale Farm has right of way through Hale Close farm to Pine Park Road on existing driveway. We wish to maintain this right. No new road crossing driveway. Hedgerows tree and bushes were cleared. Tree and bushes were thinned out of my brook about five years ago, without my permission. Town lakes field has a leat running through part of field. This is part of Honiton's old water supply. It used to run in an iron gutter down the high street known as the Honiton crystal. I do not see how houses on Honi_18 as the land is full of springs also has a high water table. I know properties still have right for this water. Put settlement boundaries to behind houses in Kings Road. Honi_14 Honi_39B Honi_14 previously had a planning application 93/P1265 rejected. Out objection is for Honi_14 and Honi_39B to be taken together. Rail bridge is very low and narrow, every time a vehicle hits a bridge it causes enormous disruption to train services. Trains are not allowed to pass over the affected structure until properly examined by a competent person, a process that may take many hours. Nothrcote hill road is only a small country road, not suitable to take anymore traffic. Many people use footpath 13, which goes through Honi_39B. This land has great landscape value. Please put settlement boundaries back to railway line as they were before?

Full name: Andrew Cull-McMullan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Although I do not oppose new residential developments in Honiton, and recognise their need, I have severe concerns regarding the proposed development on King's Road. I own a property further down the road, this does not back on to the site, however my concern is the impact this will have on traffic on the road. As a main trunk road it can be difficult, particularly in the summer to pull on to the road from our driveway. Currently, traffic can queue at the Waterleat Avenue junction to access the A35, the new development is proposed to access the main road, dead opposite, this will not be good for road users, both local and those passing through, and will likely lead to an accident, with Drivers attempting to 'go for it'. With the number of houses proposed in this development this will lead to a considerably increased risk. Some may suggest reducing the speed limit to 20mph, but this will make it even harder for residents to pull off their driveways. I could support the development if a bypass was considered, but I believe without any road layout changes, there is a considerable safety risk for a development of this size directly onto the A35. Many thanks.

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.: A35 bypass in East of town.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure residents concerns are heard.

Full name: Kirsty Davey and Matthew Davey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We have lived in the village since 1986 and I have had connections with the village all my life. We have bought up 4 children in the village and it's so nice to have the wildlife and less traffic especially with the narrow roads. It's devastating to think that there will be more fields dug up that will impact on the wildlife to accommodate all the buildings you are suggesting to be built. Also the impact on roads with the extra traffic and large lorries that would have to come through, with all the pot holes. Also the amount of near misses from people pulling straight out from the garden centre that is there already will be more hazardous with more units there. STRATEGIC POLICY SD03 : Honiton and it's development allocations. Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be unsurmountable. If the site cannot come forward within the plan period for development then it should not be allocated.
- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The

developments would be particularly visible from high ground to the north of the allocation

- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network. HONITON GROWTH - RESIDENTIAL I
OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:
 - The allocation clearly does not meet sustainability criteria;
 - The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
 - Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
 - Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.

- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

Full name: Laura Davey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

STRATEGIC POLICY SD03 : Honiton and it's development allocations. Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

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- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation
- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting

- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha
- Any viability concerns must not be an over-riding justification for bad planning
- The “local need” for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
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HONITON GROWTH - RESIDENTIAL I OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria;
- The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
- Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.
- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;

- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

Full name: MD Fallows

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As a resident of Gittisham for 40 years I am well acquainted with the geography and planning history of the area.

I wish to object to the proposals for further development East of Hayne Lane, both North and South of the railway line.

The development that has already taken place is of a ribbon nature: access from residential and industrial developments is linear and leads onto poor and narrow roads.

Any further buildings will only result in more traffic pollution and unsatisfactory access for resident or businesses.

Gittisham Parish council have already submitted formal objections: I append their objections below and concur with all of the points made.

OBJECTION - LOCAL PLAN CONSULTATION DRAFT

STRATEGIC POLICY SD03 : Honiton and it's development allocations. Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

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- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land

- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH - RESIDENTIAL I OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria;
- The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
- Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.
- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary

school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.

- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

Full name: Rosie Fox

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- HONITON GROWTH - RESIDENTIAL
- I OBJECT to the proposed allocation Gitti_05.
- The reasons for this objection are summarised as follows:
 - Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
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 - Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
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- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary schools are at capacity and is predicted to continue so;
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- Lack of provision of any accessible community facilities to serve this isolated community.

Full name: Rosie Fox

Proposal:

5. Development in the Towns and Villages

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it seems likely that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped.
- There are clearly existing viability issues in the area. If the site cannot come forward within the plan period for development then it should not be allocated.
- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a coalescence between Honiton and Gittisham village.
- The development will be highly visible, especially from elevated positions, and therefore detrimental to the setting of two designated National Landscapes (NL): formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation

- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha.
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark.
- The development would result in the loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

Full name: Carol Hall

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

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HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land, it is inevitable that the continuing development of high quality employment opportunities at Cranbrook, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

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- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH - RESIDENTIAL I OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria;
- The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
- Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.
- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety. Outside of the development there

are no pavements or public footpaths except for one on the other side of the village. There are minimal opportunities for exercise or leisure on foot or bicycle in any part of the parish;

- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advise a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
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- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community. There is a village hall in the centre of Gittisham village but residents of Hayne Farm usually drive to it as it is too dangerous to walk or cycle along the narrow, busy lane.

I am a resident of Gittisham Parish and have lived in the centre of the village for 26 years. I am married with 2 children, who were born here. I have always been actively

involved in the village, with the church, the village hall, the playground and the Parish Council. I work from home and I am a civil engineer, previously working in flood defence at the Environment Agency for 20 years. My leisure time is spent walking and running in this area, where I very much appreciate the beauty and peace of my surroundings.

Full name: Danny Holness

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: 1) Local roads, paths, and parks are wholly inadequate. The intersection between Meadow Acre Road and Hayne Lane is already an accident waiting to happen, with vehicles travelling south on Hayne Lane routinely turning left to continue on the road at dangerous speed. Vehicles also routinely enter and exit Meadow Acre Road at too high a speed, positioned centrally in the road (no markings) as if no possibility of encountering oncoming traffic. There are too many vehicles parked on Meadow Acre Road impeding traffic. The road under the train bridge is single pass only, and presumably too low for a double decker bus to pass. The right of way is frequently ignored, and clearly unable to cope with additional traffic of the scale proposed. The proposed path under the railway line is currently sectioned off and in disrepair. There is a distinct lack of functional playgrounds and local rights of way (walking paths) and no safe route to walk/cycle into Gittisham or enjoy the countryside. Devonshire Road, through Heathpark Industrial Estate is in great disrepair (potholes/fissures), and already unable to cope with peak time traffic e.g. 5pm Mondays, Tuesdays, Wednesdays, and Thursdays. The A30 cannot be accessed from Hayne Lane and so the proposed development will increase the congestion exponentially. 2) Already struggling (and potentially impacted) local services. Honiton Surgery is routinely uncontactable and online based. As an adult you can only get an appointment in a timely manner in extreme situations. How will the surgery service additional residents in their catchment. The suggestion is farcical. Similarly, one can't join NHS Dentists anymore. The waiting list is a matter of decades not years. I also fail to see how Littleton Nursery / Primary School can provide sufficient additional capacity, similarly private nurseries like Sunny Days are struggling to facilitate enough places with the Government's expanded free childcare hours. Honiton Community College has closed its sixth form. There really is not the infrastructure and services present locally to justify this scale of development. Ultimately we do need new homes, but they need to be adequately serviced and an improvement to communities, not a detriment. A proposed shop is insuffice.

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Local infrastructure/road safety and services need to be dramatically improved. A two way road and path would be needed added under the railway, a safe walking path provided to Gittisham, and functional parks/playgrounds installed. Local GP and dentist services would need to be vastly improved, and Schools supported.

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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)

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Full name: Danny Holness

Proposal:

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

GH/ED/39 was identified within the HELAA Appendix E(v)1 list and should have failed site sifting. Then suddenly on the 1st November two New sites GH/ED/39a and GH/ED/39b were created. These two new sites were put into Reg 18, with site GH/ED/39a being promoted as a 'preferred' site, and GH/ED/39b being classed as 'rejected'. I still do not understand how a site identified as 'NOT suitable or achievable' in HELAA suddenly becomes a 'preferred' site. What is even more baffling is the fact that the description for site GH/ED/39a in Reg 18 has the following first sentence: 'Whilst this site did not pass the Stage 2 HELAA Panel assessment, it was deemed appropriate to appraise, given known developer interest in the site and potential that is felt to exist to overcome possible constraints, notably in respect of highway considerations.'. The description identifies that it did not pass Stage 2 HELAA, so according to the 'Site Selection Methodology' in effect at the time (dated May2022), it should not have been put forward for consultation. Then to even add more confusion, the description indicates that another reason for putting it forward for consultation was due to the fact that there was 'known developer interest in the site'. WHAT SITE DOES NOT HAVE DEVELOPER INTEREST IN IT.

The reason(s) given for putting this forward are dubious to say the least. If EDDC are not going to follow their own methodologies and report findings, then why bother with them, and what confidence do we have that other processes and procedures have not been ignored??

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relevant policy or paragraph. Please be as precise as possible.: Remove site GH/ED/39 (and therefore GH/ED39a and GH/ED/39b) from the draft local plan.

Full name: C S LO

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to strongly oppose the proposed allocation of land at Kings Road (Honi_18) for 136 homes, as outlined in the emerging East Devon Local Plan. As a resident of Kings Road, I believe this allocation fails to meet several aspects of the test of soundness as required by Regulation 19 and the National Planning Policy Framework (NPPF). My primary concerns relate to whether the plan is Positively Prepared, Justified, Effective, and Consistent with National Policy.

1. Not Positively Prepared and Not Consistent with National Policy: Allocating 136 homes in this edge-of-town location, with significant and acknowledged pedestrian safety issues, limited existing facilities, and a demonstrable impact on the surrounding national landscape, does not represent a positively prepared strategy for sustainable development. It appears to prioritise housing numbers without adequately considering the environmental and social consequences, which is inconsistent with the principles of sustainable development promoted in the NPPF, particularly concerning the creation of healthy and safe communities (Paragraph 94).

2. Not Justified: I contend that this allocation is not justified due to a lack of robust evidence and a failure to adequately consider reasonable alternatives:

- **Honiton's Existing Allocation Levels:** It is my understanding that Honiton already has a significant number of housing allocations within this Local Plan. There is a serious question as to whether the town is being asked to accommodate a level of growth that exceeds its capacity in terms of existing facilities, infrastructure, and transportation networks. Pushing the level of housing allocation beyond the town's ability to absorb it sustainably further undermines the justification for this specific site.
- **Lack of Robust Evidence:** The Council has not provided sufficient evidence to demonstrate that the existing infrastructure, including pedestrian crossings on Kings Road, local roads, schools, healthcare facilities, and utilities, can cope with the additional demand from 136 homes. Where is the detailed transport assessment that comprehensively addresses the cumulative impact of this and other proposed developments on traffic congestion and pedestrian safety? The landscape impact

assessment also appears insufficient in light of the site's proximity to a valued national landscape. There is a lack of clear evidence demonstrating the specific need for this scale of development in this precise location, especially considering the existing challenges.

- **Failure to Consider Reasonable Alternatives:** Has the Council transparently considered other sites within Honiton or the surrounding area for this level of housing? What were these alternatives, and what were the specific reasons for their rejection in favour of Kings Road? Without this information, it is impossible to conclude that this allocation represents the most appropriate strategy.
- **Impact on Local Character:** There is a concern that the scale and design of 136 homes on this site may not be in keeping with the existing local character of Honiton and the surrounding area, further undermining the justification for this allocation in this sensitive location.
- **Lack of Community Engagement:** Was the community adequately consulted specifically on the allocation of this site for this scale of development? Were the concerns of local residents, particularly those living on Kings Road, properly taken into account in the decision-making process?

3. Not Effective: The proposed allocation raises significant concerns about whether it is effective and deliverable:

- **Deliverability Concerns due to Infrastructure Deficiencies:** The existing dangerous pedestrian crossing on Kings Road and the potential for increased traffic congestion raise serious questions about the deliverability of this site without significant and potentially costly infrastructure upgrades. There is no clear commitment or funding plan outlined for these necessary improvements.
- **Strain on Existing Facilities:** The lack of a supermarket on this side of town and the already stretched capacity of other facilities and infrastructure within Honiton (schools, healthcare, etc.) suggest that this development is not deliverable in a way that supports a thriving and sustainable community.

4. Not Consistent with National Policy (Further Points): This allocation appears inconsistent with several key aspects of the NPPF:

- **Protecting and Enhancing the Environment (Paragraph 174):** The development's location on the edge of a beautiful national landscape and the direct impact on residents' views clearly conflict with the policy to protect and enhance valued landscapes. The potential impact on local biodiversity also needs further investigation.
- **Promoting Sustainable Transport (Paragraph 111):** Locating a significant number of homes in an area with a known dangerous pedestrian crossing and limited public

transport options (requiring crossing a busy road) does not prioritise sustainable transport modes.

- **Loss of Green Space:** The allocation likely involves the loss of green space that may be valued by the local community for recreation and amenity. The NPPF encourages the protection of such spaces.
- **Precedent Setting:** Approving this development could set an undesirable precedent for further unsustainable development on the edges of Honiton, further encroaching on the surrounding countryside. **Suggestions and Conclusion:** I reiterate my understanding of the need for housing within East Devon. However, the proposed allocation at Kings Road (Honi_18) presents significant and unacceptable challenges related to safety, infrastructure, landscape impact, and the overall sustainability of the development, especially when considered in the context of Honiton's already substantial housing allocation. If the Council insists on pursuing development in this area, the following are essential:
 - A detailed and independently reviewed traffic and crossing technical study must be completed and its recommendations fully funded and implemented before any development commences. This must deliver demonstrable and significant improvements to pedestrian safety on Kings Road.
 - Substantial investment in local infrastructure, including a supermarket on this side of town, expansion of existing schools and healthcare facilities, and improvements to utilities, must be secured and guaranteed.
 - A significant buffer zone must be established and rigorously protected between the development and the adjacent national landscape to mitigate visual and ecological impacts.
 - A thorough assessment of alternative sites that are more sustainable and less impactful on existing communities and the environment must be undertaken and made publicly available.
 - The Council must provide clear justification for the overall level of housing allocation within Honiton and demonstrate that the town's infrastructure and facilities can realistically accommodate this growth. I strongly urge the East Devon District Council to reconsider this unsustainable and unsound allocation and to prioritise alternative sites that better align with the principles of sound planning and the long-term well-being of the residents of Honiton and the protection of our valuable natural environment. Thank you for your thorough consideration of these significant concerns.

Full name: Honiton Group Petition

Other party name (if relevant): On behalf of 80 residents who have signed the petition

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We are writing on behalf of over 80 local residents who have signed a petition opposing the proposed development in Honiton (Kings Road) under the Local Plan Strategy SDO3. As concerned residents, we wish to formally object to this proposal due to significant concerns regarding road safety, access issues, environmental impact, and the overall well-being of the existing community.

Road Safety & Access issues: The proposed development raises serious concerns about increased traffic congestion and road safety risks. Kings Road is already under strain with existing traffic, and is often at a stand still with heavy commercial traffic, this is only exasperated during the summer months. The road has already given way previously and is often closed due to accidents. The additional burden of construction vehicles and increased residential traffic will exacerbate these issues. The incredibly busy road with limited access points make this area unsuitable for further expansion without significant infrastructure improvements.

impact on Residents' Well-being: This development will have detrimental effects on the mental health and quality of life of existing residents. The peaceful and scenic nature of this part of Honiton is a defining characteristic of our town, and its destruction will cause distress to many who rely on this environment for their well-being.

Environmental & Wildlife Concerns: The site in question is home to local wildlife that would be displaced by this development. The loss of green space will negatively impact biodiversity and the natural beauty that contributes to Honiton's unique character. The

area serves as a haven for local flora and wildlife and any development will irreversibly damage these ecosystems.

Heritage and Visual Impact: The site's current landscape forms an iconic part of Honiton's identity as a historic market town. Any large-scale development risks undermining the town's rural charm, replacing it with an unsightly and inappropriate expansion that fails to respect the existing character of the area.

The EDCC Process. We are deeply concerned at the flawed process that this consultation has taken in relation to Honi-18. we first heard of the proposals 2 weeks ago in that time we have visited local homes and could have had many more signatures to this petition but there was such limited time to do this. Of the 80 people only 6 have known about the plans which reveals the extraordinary lack of openness and transparency that has marked the process. If this is not illegal then it is certainly cowardly and underhand and does no credit to EDCC- it will have served to alienate the local community. Every single person who has signed this petition was aghast at the plans and the way that they simply do not fit the area.

[Petition wording below]

Local petition to oppose the plan HONi-18 in the 2020-2042 consultation (under local plan strategy SD03)

We the undersigned oppose the Honi-18 plan for the following reasons:

1 This is an area of great natural beauty and should not be lost to new housing. Once lost it can never be recovered. Even though it is not officially delegated as AONB it is clear to everyone that these fields are an integral part of the beauty of this area East of the A35.

2. There is abundant wildlife in these fields. Buzzards, peregrine falcons, woodpeckers, deer, heron, foxes, rabbits, badgers, magpie, crested newts, and many hedgerow birds including chaffinch bullfinches goldcrest. These need protecting in this stunning area.

3. The local infrastructure can not support more housing in this area of the town, As the roads are already overly busy and the plans for access to the proposed site are inadequate and dangerous given how steep , narrow and windy the road is above the junction to Waterleat Lane . This plan has simply not taken into account the disruption that the planned road layout will have on local people. The amount of traffic is already of great concern for local people and we see the plan for a junction above the Copper Castle as dangerous and disruptive. Anyone with personal knowledge of the road will know this is a very bad and substandard plan.

We protest most strongly that EDCC has not considered this aspect properly and is riding roughshod over the needs of local people.

4.This plan would greatly alter the feel and beauty of the north east end of the Honiton and thereby diminish this lovely old market town. It is this very reason that previous attempts to building housing in this area have been unsuccessful. We must not sell the soul of Honiton for short term and inadequate housing solutions.

5. The well-being and mental health of the residents need protecting as the area and the views are very important to their lives does the EDCC really want to exacerbate the mental health crisis in our society.

6 We want to register our deep unease and protest at the secretive process by which this consultation has been run. As stakeholders in the town we believe we should have been actively informed about the proposed plan which only appears to have become a live option in June 2024, and which many of the undersigned only came to know about it in March 2025 .

[text has been reformatted as the original version was a scan having been handed to reception as a paper copy original can be seen in the attached PDF blank pages have been removed for ease of reading]

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.:

For these reasons, we strongly urge the planning committee to reject to reconsider this area for proposal under the draft local plan and reconsider the long-term impact of such developments on the town and its residents. We request that the council gives due consideration to our concerns and prioritizes sustainable, community-led planning over unsympathetic urban expansion. There are several other locations highlighted in the draft plan such as the land to Cuckoo Down lane that is not directly impacting residents and has significantly reduced traffic. We appreciate your time and consideration of this objection and would welcome the opportunity to discuss this matter further.

It is our view that another site, one that is brownfield (or simply more appropriate) needs to be found. In this way the needs for more housing can be met but which does not undermine the town and the lives of those who live in the North-East of the town so harshly.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Helen Mary Roulson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: We need large open spaces big enough for kicking a football around, like the size of Honiton Bottom Road park

Full name: David Valentine

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

OBJECTION - LOCAL PLAN CONSULTATION DRAFT

STRATEGIC POLICY SD03 : Honiton and it's development allocations. Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be unsurmountable. If the site cannot come forward within the plan period for development then it should not be allocated.

- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation
- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH - RESIDENTIAL I OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria;

- The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
- Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.
- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised

- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Delete Land west of Hayne Lane Policies Gitti_03, Gitti_04, Gitti_05

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure full understanding of the issues raised in the objections

Full name: Matthew Waldron

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Given the limited details that relate specifically to this area, I don't think there are any legal compliance issues.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Regarding the section on “land west of Hayne Lane (Gitti_03, Gitti_04, and Gitti_05),” where I also live, the draft states: “This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented.”

This statement is particularly important as this area will accommodate the largest share of Honiton’s development—over 300 of the proposed 800+ homes—alongside an expansion of the trading estate.

I want to clarify that I do not oppose building more houses; I recognise that this needs to happen all over the country. However, beyond ensuring a good standard of new homes, I expect the supporting infrastructure, accessibility, and impact on nearby communities to be handled with fairness and due diligence.

I hope more details will be provided because, as it stands, the draft only states: “It is expected that vehicular access to the residential development will be via the existing estate to the north (i.e., via Meadow Acre Road).”

This is a serious concern. The development in this area has not been planned with long-term viability in mind. Only last year, the community was consulted, and I have already raised concerns about the existing issues.

Currently, access to the area is inadequate due to:

1. Narrow roads—Hayne Lane has short sections for two-way traffic and is constrained by the railway bridge, and Meadow Acre Road is not wide enough for two-way traffic, especially with parked cars on both sides.
2. Limited entry points—Access is only via Beech Walk, which is a single lane, or through the trading estate, which is already prone to congestion and is set to expand.

While this situation is still manageable, it must not be made worse.

Meadow Acre Road has hundreds of properties facing onto it. I understand that previously, local residents opposed access via Old Elm Road due to traffic concerns. However, Old Elm Road is a standard bi-directional road with pavements, a bus stop, and only one house facing it directly. In contrast, Meadow Acre Road is too narrow for bi-direction traffic, and is lined with homes—yet it is now proposed as the primary access route for new development.

If Old Elm Road was deemed unsuitable, then Meadow Acre Road, which is even less appropriate, should not be considered a viable access route. At the very least, its residents should have the same right to object.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Open Old Elm Road for permanent access. This would improve connectivity to Honiton, reduce reliance on the unsuitable Beech Walk and Hayne Lane routes, and ease congestion in the trading estate.

2. Create a new access route via the road past Combe Garden Centre toward Gittisham Forge. While this road is currently narrow, it differs from Meadow Acre Road in that no houses face onto it, meaning traffic flow would be more manageable. It could be improved by widening it or restricting parking to designated laybys. At the very least, it would provide an alternative access route instead of forcing all traffic through Meadow Acre Road.

While the existing single-lane section under the railway bridge toward Gittisham village would not be suitable for increased traffic, a new road could turn off before this point to connect with the proposed development.

This approach would create a fairer, more sustainable infrastructure plan for both new and existing residents, providing two main access routes and making the best out of a difficult situation, which I strongly believe is a fair compromise.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As resident stakeholder to this proposal, I would absolutely expect to see a case which can provide detail and assurance to show how concerns will be addressed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Sean Webber

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I do not believe that the areas HON_07, HON_12, or HON_13 are suitable for development. They are within the National Landscape and are very close to historic buildings - they would surround St Michael church. The fields are also an important green space for people living nearby and developing the land would result in the town spreading further into the adjacent countryside, reducing the access to greenspace for existing residents. The addition of some many extra houses would also result in increased traffic and noise.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe these areas should be removed from the plan, or the scale of the development should be significantly reduced. The area HON_07 seems the most suitable of the three areas but I believe development of HON_13, and particularly HON_12 would have a significantly negative effect on the local area and its residents.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Scott Wolfe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed entrance/exit onto an already over trafficked A35 that can take 5 mins or more to pull onto, even worse in summer, a road with a high rate of accidents resulting to deaths or serious injury in this area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Building on sites already under development to the west and north of the town are more suitable and enviromentaly viable.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The town is alredy suffering from over population regarding amenities, it is impossible to get a NHS dentist, an appointment at the surgery is just as bad and the local scool classrooms overcrowded

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: DEVELOPMENT IN THE TOWNS AND VILLAGES The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution. Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
See response to Q2(b)

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See response to Q2(b)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I have no idea and am therefore neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Cllr David Valentine

Organisation (where relevant): Gittisham Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

OBJECTION - LOCAL PLAN CONSULTATION DRAFT

This is a representation made on behalf of GITTISHAM PARISH COUNCIL

STRATEGIC POLICY SD03 : Honiton and it's development allocations. Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 The Gittisham Parish Council OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be unsurmountable. If the site cannot come forward within the plan period for development then it should not be allocated.
- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation
- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH - RESIDENTIAL The Gittisham Parish Council OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria;
- The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
- Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.
- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment

- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Delete policy in relation to: Land west of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that all the relevant planning issues are taken into consideration

Full name: Heloise Marlow

Organisation (where relevant): Honiton Town Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Honi_12 was rejected for development by EDDC in the public consultation process which ran from November 2022 to January 2023. Rejection of Honi_12 for development was reiterated by EDDC in July 2023 and June 2024. The agenda for EDDC's Strategic Planning Committee meeting on the 20th September 2024 confirmed that Honi_12 was not recommended for development. However, the agenda for the Strategic Planning Committee meeting on the 29 October 2024 recommended Honi_12 for housing allocation and the Committee resolved to include Honi_12 in the site allocation.

Honi_18 was referenced in the minutes of the Strategic Planning Committee meeting held on 11 December 2024 as being one of the “changes that had been made to some local plan chapters to ensure greater consistency of approach throughout the document and to address matters on potential development allocation sites that had been agreed by Committee as previous meetings.” A search of the previous agendas and minutes for the Strategic Planning Committee has found no reference to Honi_18 at all.

It is clear that for both sites, Honi_12 and Honi_18 EDDC failed to properly consult on the allocation of these sites and their inclusion in Strategic Policy SD03: Honiton and its development allocations is not legally compliant

In addition Honiton Town Council objects to the inclusion of Honi_07. Honiton Town Council objected to the inclusion of Honi_07 in January 2023 due to the adverse impact

on landscape, heritage and its siting in a Natural Landscape (formerly Area of Outstanding Natural Beauty). EDDC initially identified the site as a second choice site accepting that development would have a high impact on landscape and heritage.

Should sites Honi_07 and Honi_18 be allocated for development, Honiton Town Council would ask that the original boundaries be reinstated.

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.: Honi_07, Honi_12 and Honi_18 should be removed as development sites from the Local Plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Honi_12 was rejected for development by EDDC in the public consultation process which ran from November 2022 to January 2023. Rejection of Honi_12 for development was reiterated by EDDC in July 2023 and June 2024. The agenda for EDDC's Strategic Planning Committee meeting on the 20th September 2024 confirmed that Honi_12 was not recommended for development. However, the agenda for the Strategic Planning Committee meeting on the 29 October 2024 recommended Honi_12 for housing allocation and the Committee resolved to include Honi_12 in the site allocation.

Honi_18 was referenced in the minutes of the Strategic Planning Committee meeting held on 11 December 2024 as being one of the "changes that had been made to some local plan chapters to ensure greater consistency of approach throughout the document and to address matters on potential development allocation sites that had been agreed by Committee as previous meetings." A search of the previous agendas and minutes for the Strategic Planning Committee has found no reference to Honi_18 at all.

It is clear that for both sites, Honi_12 and Honi_18 EDDC failed to properly consult on the allocation of these sites and their inclusion in Strategic Policy SD03: Honiton and its development allocations is not legally sound.

In addition Honiton Town Council objects to the inclusion of Honi_07. Honiton Town Council objected to the inclusion of Honi_07 in January 2023 due to the adverse impact on landscape, heritage and its siting in a Natural Landscape (formerly Area of Outstanding Natural Beauty). EDDC initially identified the site as a second choice site accepting that development would have a high impact on landscape and heritage.

Should sites Honi_07 and Honi_18 be allocated for development, Honiton Town Council would ask that the original boundaries be reinstated.

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.: Honi_07, Honi_12 and Honi_18 should be removed as development sites from the Local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Honi_12 was rejected for development by EDDC in the public consultation process which ran from November 2022 to January 2023. Rejection of Honi_12 for development was reiterated by EDDC in July 2023 and June 2024. The agenda for EDDC's Strategic Planning Committee meeting on the 20th September 2024 confirmed that Honi_12 was not recommended for development. However, the agenda for the Strategic Planning Committee meeting on the 29 October 2024 recommended Honi_12 for housing allocation and the Committee resolved to include Honi_12 in the site allocation.

Honi_18 was referenced in the minutes of the Strategic Planning Committee meeting held on 11 December 2024 as being one of the "changes that had been made to some local plan chapters to ensure greater consistency of approach throughout the document and to address matters on potential development allocation sites that had been agreed by Committee as previous meetings." A search of the previous agendas and minutes for the Strategic Planning Committee has found no reference to Honi_18 at all.

It is clear that for both sites, Honi_12 and Honi_18 EDDC failed to properly consult on the allocation of these sites and their inclusion in Strategic Policy SD03: Honiton and its development allocations fails to comply with the duty to co-operate.

In addition Honiton Town Council objects to the inclusion of Honi_07. Honiton Town Council objected to the inclusion of Honi_07 in January 2023 due to the adverse impact on landscape, heritage and its siting in a Natural Landscape (formerly Area of Outstanding Natural Beauty). EDDC initially identified the site as a second choice site accepting that development would have a high impact on landscape and heritage.

Should sites Honi_07 and Honi_18 be allocated for development, Honiton Town Council would ask that the original boundaries be reinstated.

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.: Honiton Town Council wishes to ensure that its objections are put to the Planning Inspector by a representative of the Council.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Honi_07 and Honi_12: Sites Honi_07, Honi_12 and adjacent site allocation Honi_13 surround the grade II* Church of St Michael and All Angels and lych gate, and its associated grounds, on three sides. Its prominent position on higher ground at the edge of the settlement contributes to its significance. Close to the church is the associated grade II listed Former Sextons House. The church is now closed and seeking a new use; it is on the Heritage at Risk Register. Depending on its location and scale there is potential for development of land around the church to result in harm to the significance that the church derives from its setting. Please see our separate comments on Honi_13 below, which we recommend should be removed from the Plan. We are also concerned about the potential for built development in Honi_07 to result in considerable harm to the immediate setting of the Lych Gate and Sexton's House, and potentially the church itself. It appears that at modest densities, the land within Honi_12 would be adequate to accommodate the stated residential capacity. We therefore request that clear wording is included in the policy to restrict future use of Honi_07 to open space, and potentially the site access, provided this can be located and designed to limit harmful impacts. Further clarity around key requirements for the remainder of the site (Honi_12) is also needed, consistent with NPPF paragraph 16(d). In particular, limits on building heights to conserve views of the church tower, and retention and strengthening of field boundaries as landscaping buffers. Bearing in mind the closed and 'at risk' status of the church, consideration should be given to ways in which development of the site could assist in securing the future of the church, e.g. as a community asset and through use of developer contributions.

Honi_13: Honi_13 is immediately adjacent to the grade II* Church of St Michael and All Angels with clear intervisibility between the site and the graveyard. Historic England has

formerly raised significant concerns about an application for five dwellings on this site. These are set out in our response to application 16/0145/FUL, which was subsequently withdrawn. It now appears that a single storey dwelling has been approved and is being constructed on the site in place of a former outbuilding.

Honi_18: The grade II listed Copper Castle former toll house and associated grade II listed gates form a legible entry point to Honiton. Development should seek to conserve and enhance the significance of these assets consistent with policies in the NPPF. This could be achieved by excluding development from the field parcel between Axminster Road and the drive to Hale Close Farm and ensuring that the proposed junction is carefully located and designed.

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.: Honi_07 and

Honi_12: Amend the policy text as follows: “The site is in the Blackdown Hills National Landscape area and close to heritage assets, it will require very careful design to take account of its landscape setting and the setting of surrounding heritage assets. This should include limits on building heights, retention of field boundaries and creation of landscaping buffers. Land within the northern field parcel should be retained as an open green space with no built development, other than potentially a vehicle access, provided that the impacts of this can be appropriately mitigated.” The policy should require/promote (as appropriate) a linkage between development of the site and securing the future of the church, e.g. through developer contributions.

Honi_13: We recommend that Honi_13 is removed from the Plan.

Honi_18: Additional text for Honi_18 “Development should conserve the settings of the listed Copper Castle and gates, by keeping the eastern side of Axminster Road clear of built development, and through sensitive siting and design of the proposed access.”

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic Policy SD03 seeks to allocate sites in Honiton for around 800 new homes and 17.9 ha of employment land. The majority of employment land (14.6 ha) is to be allocated at the western end of the town to enable extension of the existing Heath Park Industrial Estate near to the A30 Turks Head grade separated junction. It is noted that the site allocation is carried forward from the adopted Local Plan. Whilst the planned level of growth is considered unlikely to require strategic transport improvements, there is the potential for queuing interaction with the local highway network. It is therefore recommended that the policy wording for proposed allocations Gitti_03, Gitti_04 and Gitti_05 (Land west of Hayne Lane) should reference the need for development to avoid any adverse impacts in terms of SRN safety. Pedestrian access onto the A30 should also be suitably prevented and adequate pedestrian routes should be provided in vicinity of the site to discourage access onto the A30. 50. Residential development at the eastern end of Honiton has the potential to impact on the A35/ High Street mini-roundabout. We therefore support policy wording in respect of maximising opportunities to enhance sustainable travel modes.

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: 18.

Further transport evidence submitted in support of the Publication Draft includes a traffic modelling exercise considering the SRN impacts of planned growth in the towns of Honiton and Axminster (TRI-22). The A30 at Honiton provides two grade separated interchanges, with the Turks Head junction located at the western end of the town and a second interchange with the A35 located at the eastern edge. The A35 provides onward access to Honiton town centre via an at-grade roundabout junction with the High Street. The A35 continues to the immediate south of Axminster and offers three all movement junctions to access the town, known as Yarty Bridge, Abbey Gate and Symonds Lane. National Highways has reviewed the submitted assessment work and is writing separately to East Devon Council and Devon County Council regarding the assessment work undertaken. Key comments include the following, and are reflected in subsequent comments on Policy wording for the Regulation 19 plan, or will be reflected in a future Statement of Common Ground with East Devon Council: Planned development in Honiton will impact the A30 Turks Head junction, A30/ A35 interchange, and A35/ High Street roundabout. Whilst some allocations are carried forward from the adopted Local Plan, they have not yet come forward for development and it is appropriate to consider their cumulative impact. Estimated traffic flow increases at the Turks Head junction peak at 80-90 vehicles per hour for movements to/ from the west. Increases at the A30/ A35 interchange are around half this figure. Whilst the increases are considered unlikely to trigger a requirement for a change in slip road layout – as demonstrated by the Devon County Council work – National Highways will undertake its own review of the continued safety of the slip road layouts given projected increases in demand. No operational assessment has been undertaken for the nearby Exeter Road mini-roundabout. Operation of this roundabout has the potential to generate queuing back towards the A30. It will be imperative that future applications for development in Honiton consider the operation of this junction, to ensure that queuing does not impact on the safety and efficiency of the SRN. Development at the eastern end of Honiton will place further pressure on the A35/ High Street junction. The junction is constrained and

will be sensitive to peak hour traffic increases. It will therefore be important to ensure that new development at the eastern end of the town is integrated into existing active travel and public transport networks to avoid car-dependent development.

Full name: Craig Hatton

Organisation (where relevant): Network Rail

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Land at Kings Road (Honi_18) Land south of Northcote Hill – north of the railway (GH/ED/39a) Land south of Northcote Hill – south of the railway (GH/ED/39b)

Network Rail supports the identification of contributions towards sustainable transport and improved pedestrian connections.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Craig Hatton

Organisation (where relevant): Network Rail

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Land west of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05)

Network rail supports the improved pedestrian and cycle links to connect the two halves of the development. Network Rail support safe access and therefore no at grade railway crossing should be provided. Network Rail suggest that a new pedestrian and cycle footbridge may be required to prevent users being sent under ground. Network Rail notes the sensitive nature of the site.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Angela Brooks

Organisation (where relevant): Fisher German LLP

Other party name (if relevant): National Grid Electricity Transmission (NGET)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below:

Land south of Northcote Hill – north of the railway (GH/ED/39a) 4YA ROUTE TWR (002 - 112): 400Kv Overhead Transmission Line route: AXMINSTER – EXETER & CHICKERELL - EXETER

A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective as they cannot be delivered as

proposed; unencumbered by the constraints posed by the presence of NGET infrastructure.

New Infrastructure

Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources.

These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Accordingly, we request that the Council is cognisant of the above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We propose modifications to the above site allocations and/or policies to include wording to the following effect. We propose that these modifications are applied to each of the aforementioned site allocations affected by NGET assets:

SD03: Land south of Northcote Hill – north of the railway (GH/ED/39a)

"The potential impact of the existing overhead transmission line route on design and layout should be taken into account at the pre-application stage through early engagement with National Grid."

SD04

Full name: Jon Williams

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: We are fully supportive of this allocation and consider this site as fully suitable for development.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

We are fully supportive of this allocation and consider this site as fully suitable for development. The site sits on the very edge of Ottery St Mary. The site is directly adjacent to the B3174 Road which directly connects to the A30 at Daisy Mount Interchange to the east (which is less than 2 miles from the site). This site is on the most accessible side of Ottery St Mary with excellent connectivity. The site is within easy walking distance of the Town Centre. The site allocation of 90 dwellings can easily be accommodated (including affordable provision). DCC intends to preserve part of the site for a potential primary school which would be sized to initially deliver a 210 place primary school (but with the site being capable of expanding to a 420 place primary school). DCC is also committed to preserving an area of land, which would be suitable for a teaching block of at least 8 classrooms and also provide some additional ancillary land, if identified as necessary, for a future expansion of Kings School. The site is also fully capable of providing Public Open Space, a community access areas, BNG, and an environmental area. The site was subject to an outline planning application in 2020 (East Devon Planning Reference 20/1504/MOUT). This application was refused in large part, as it was an exception site and not included in the Local Plan. This will be resolved if the site is included in the Local Plan, following examination. The 2020 Outline

Planning Application was recommended for approval by East Devon Planners and the application process had positively resolved the vast majority of issues to bring this site forward. The core issues being the following: Site Access – In the 2020 application it was proposed that a roundabout was constructed on the B3174 on the south west quadrant of the site. This roundabout would support both development on Thorne's Farm and the land to the south of the B3174 which has now been identified in the emerging East Devon Local Plan. This was widely accepted as a good access solution. It was proposed that the development created a spine road through the site which connected to Cadhay Lane on the north east corner of the site. The new spine road provided opportunities to reduce traffic or even make part of Cadhay Lane outside Kings Schools access only. The Outline Planning Application provided positive solutions to provide footways to connect into the existing footpath network to Barrack Road and beyond. The site was to include a network of footways and cycleways to provide good permeability for pedestrians and cyclists. Drainage – The planning application proposed that the site was drained into the watercourse on the northern boundary of the site through a mixture of gravity and pump drainage. These subs solutions were accepted by the Local Authority Flood Team. Topography and Visual Impact – The site gently inclines from east to west and with the western boundary of the site being the higher. The site also slopes towards the B3174. A full Landscape Visual Impact Assessment was undertaken as part of the application by NPS Group and this identified the Visual Impact as low based on a number of viewing points, which were agreed with East Devon Planners. This Visual Impact Assessment was not presented at the Planning Committee. Landscaping and Design – The 2020 Planning Application anticipated that the vast majority of trees and hedges could be preserved and there were good opportunities for additional tree planting within the site, both to improve attractiveness and further mitigate visual impact. The previous application was intended to provide a welcoming 'street scene layout' and pick up design element from the local area. Site Viability - In 2020 a joint viability assessment was commissioned by DCC and EDDC. This assessment concluded that - "the application site is sustainable and suitable for the provision of affordable housing being well located to the Town Centre and accessible to services, transport links, facilities and employment opportunities". Site Layout – The 2020 planning application layout clearly demonstrated that 150 residential units, a primary school site, an area of land preserved for secondary education and an environmental area could all be accommodated successfully on the site. The current proposal for the development of 90 residential units, education areas and other facilities can therefore be comfortably accommodated. Overall – There can be high confidence that this site is deliverable based on the significant body of work that was submitted and accepted as part of the 2020 Outline Planning Application.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: We are fully supportive of this allocation and consider this site as fully suitable for development.

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.: We would like to participate in the hearing to address any objections that may be raised in relation to this allocation.

Full name: Jon Williams

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

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.: Policy SD04 should reflect the need for additional primary and improved secondary education provision in Ottery St Mary and recognise this as a requirement to support the policy with the latter also supporting the wider aspirations of the plan. Requested additional wording to Policy SD04 is shown below : “In addition to the delivery of a new primary school with provision for early years in Ottery St Mary, improved secondary school facilities are required to support further development in Ottery St Mary and the wider aspirations of the plan.”

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

On behalf of our client, Mr M.J. Nancekivell and Mr R.P. Nancekivell ('the Landowner'), we set out representations to the East Devon Local Plan Regulation 19 Consultation (the 'Draft Plan') in relation to land at Barrack Farm, Ottery St Mary ('the Site') The Site (Plan 1) is identified as a draft allocation (Otry_01b) for housing and employment development (70 homes and 1.25ha of employment land) in the Draft Plan. The purpose of these representations is to: 1 Outline the need for additional housing numbers in the Draft Plan. 2 Support the allocation of the Site for housing/employment and demonstrate the site is suitable, available and deliverable. 3 Demonstrate that the Site has capacity to deliver circa 90 homes (rather than 70) and 1.25ha of employment land, optimising its potential. 4 Comment on other policies in the plan insofar as they relate to the promotion of housing/employment development at the Site. The Landowner has other land interests in Ottery St Mary and we have submitted separate representations in relation to land at Gerway Farm (draft allocation ref. Otry_21). Strategic Overview and Housing Need We have provided a full assessment of the Draft Plan's strategic policies and the approach to meeting District-wide housing need in our representations to Otry_21. We do not repeat those details here but note the following headlines, because they support the principle that the capacity of allocated sites should be maximised where possible: 1 EDDC is proposing to reduce its rate of housing delivery below that achieved over recent years; 2 The approach to the NPPF's 'transitional arrangements' is flawed and EDDC cannot simply plan for 80% of its up-to-date housing need. The Draft Plan must be revisited to plan for its full need i.e. 1,188 dwellings per annum, over the plan period; 3 The approach to a phased housing trajectory does not comply with national policy. Planned delivery must meet or exceed the annual housing need figure; EDDC cannot plan to underdeliver for the first

11 years of its Plan and then make up for this in the latter years – this has significant implications for social and economic growth and will have resultant impacts on, for example, affordable housing and the wider housing crisis; 4 The Draft Plan does not deliver a 5YHLS with requisite buffer (20%) and will therefore immediately fail NPPF para. 78(c); and 5 There is an overreliance on the large/complex sites, particularly the new settlement. This includes a flawed approach to its assumed delivery rates (too soon in plan period, with implications for 5YHLS, and overestimated total delivery across the plan period). In conclusion, the Draft Plan is therefore not planning for sufficient housing across the full plan period and must be amended to plan for its full up-to-date housing need. There is a particular need to identify land to deliver additional housing numbers in the early-mid plan period and feed into 5YHLS. Housing numbers to one side, the Landowner supports the spatial approach to housing delivery across the settlements in East Devon, including the recognition that Ottery St Mary as a Main Centre should support significant development over the Plan period. It is therefore well placed to deliver some of the additional housing need for East Devon. Policy SD04: Ottery St Mary and its development allocations Land at Barrack Farm – Otry_01b Our client supports the allocation of Barrack Farm (Policy SD04, Otry_01b) for housing and employment use; the Council clearly recognises that the Site is suitable and available. In accordance with NPPF para. 130(a), however, policies should ensure that developments make optimal use of the potential of each site to meet as much of the identified housing need as possible. This also aligns with draft policy DS02 (efficient use of land). These representations explain that, through technical assessment and initial design concept work, the Site has capacity to deliver circa 90 homes and 1.25ha of employment land. Policy SD04 (Otry_01b) should be redrafted to reflect this. Housing Numbers The accompanying Vision Document (VD) (Annex 1) sets out a summary of the preliminary technical work undertaken to assess the constraints/opportunities of the Site, followed by initial design concepts to inform an indicative framework plan with developable areas. Based on relatively low densities of circa 35 dwellings per hectare (suited to this context) this clearly demonstrates the Site has capacity to accommodate a further 20 homes (in addition to the 70 homes referenced in the current draft allocation), plus the 1.25ha of employment land. This will assist in supporting East Devon to meet its increased housing need. The Site Selection Report (SSR) for Ottery St Mary states that the site is suitable for residential development at 30dpha, but no justification is given for the density stated, and the Methodology states that final allocation density will be determined in line with Stage 3: Site assessment: “The yield shown at the start of the site assessment is calculated using the maximum in the HELAA methodology. The site assessment may indicate that this should be reduced, for example to take account of landscape, ecological, or historic environment features; to achieve a higher yield in particularly accessible locations; or to reflect Local Plan consultation responses. Where this is the case, the yield will be adjusted to ensure that the Local Plan reflects a realistic site potential, and commentary will highlight parts of

the site where density should be lower or built development avoided.” (para. 1.25). For allocation ref. Otry_01b this must be adjusted to reflect the detailed technical work undertaken and optimise the potential of the Site. This would ensure draft Policy SD04 accords with the NPPF and draft policy DS02 (efficient use of land). Summary of Technical Assessment

Landscape and Visual Impact The accompanying VD includes a landscape and visual appraisal (pg. 10) which explains that the site: 1 Is of ‘Medium Value’ as ‘an ordinary landscape which is appreciated by the community but has little or no wider recognition of its value’.

2 While agricultural, it experiences urbanising influences including lit roads, built form and playing fields; and, 3 Has the capacity to successfully accommodate new development, with residential in the lower, eastern parts of the site opposite the existing urban edge, and employment land where the agricultural sheds are currently located.

Archaeology and Heritage The draft allocation requires further archaeological assessment prior to development. The Landowner has undertaken an archaeological assessment of the full extent of their interest at land parcel ref. Otry_01 (i.e. the draft allocation plus the fields immediately to the west), which identifies a short-lived early 19th century infantry barracks on the Devon Historic Environment Record towards the eastern end. The exact siting is unknown, but this is not a constraint that would prevent the development of the site subject to the draft allocation (ref. Otry_01b), and as shown in the framework plan in the accompanying VD. There are a number of listed buildings within 1km of the site and the Ottery St Mary Conservation Area covers the historic Town centre and lies 630m to the east of the site at its closest point. As a result of local topography and modern development activity, no potential impacts on the setting of designated or non-designated heritage assets have been identified.

Highways and Access We support the approach to coordinating the access between the two allocations Otry_01b and Otry_09. However, the responsibility for delivery of an

access to facilitate both allocations is only included within the wording of the Barrack Farm allocation (Otry_01b). This assumes responsibility of Otry_01b only, which is not justified, nor is this necessarily feasible. Draft Policy SD04 Otry_01b requires the site to ‘provide a harmonized access and interaction with Land at Thorne Farm (Otry_09)’. It should simply be required to provide an access which does not fetter the potential for access to Otry_09, illustrating how both site entrances would work in harmony once both sites are delivered. These representations are accompanied by a Highways and Transport Technical Note (Annex 2) (HTTN), which explains that the Site: 1 Is suitable for development for around 90 dwellings and 1.25ha of employment land because a range of facilities and services are readily accessible by walking, cycling and public transport, meeting the requirements of draft Strategic Policy TR01 (walking, wheeling, cycling and public transport). 2 Vehicular access can be achieved from the unnamed road to the east of the allocation. 3 A safe pedestrian route can be provided through the Site to accommodate connections to the proposed commercial units. Detailed requirements for a travel plan/transport statements/transport assessments (draft Strategic Policy TR03) and regarding car/cycle parking and charging points can be addressed at the detailed design stage (draft Strategic Policy TR04: Parking standards - Residential).

The Transport Technical Note explains that analysis has been undertaken (using DataShine Commute) to establish the likely trip distribution for about 90 houses and 1.25ha of employment land. It confirms vehicles will disperse within the road network in Ottery St Mary and this is not likely to result in an unacceptable impact. It is concluded that satisfactory access can be achieved and the Site is deliverable from a transport and movement perspective. We are aware that the site is within the Aerodrome Safeguarding outline area. However, residential development will not exceed three storeys, nor will it have high structures, and it will therefore not interfere with radio signals or create bird strike hazards.

Flooding The Technical Note on Flooding, Water Efficiency and Green & Blue Infrastructure at Annex 3 explains that: 1 The site is within fluvial Flood Zone 1 and is at very low risk of flooding, and therefore no flood mitigation is required; 2 A flood risk assessment will be prepared to support a planning application due to a site area of

over 1ha, as per national requirements; 3 Surface water flooding can be accommodated through a comprehensive drainage network, including use of sustainable drainage systems; and, 4 Water efficiency can be addressed at the detailed design stage and can be achieved through the installation of reduced water fittings and water butts as needed. There are no flood risk or drainage matters that would preclude development of the Site for about 90 houses/1.25ha of employment land and any proposal would accord with the requirements of draft Strategic Policy AR01 regarding Flooding.

Ecology The accompanying Ecology Appraisal (EA) (Annex 4) confirms that the site is not affected by; 1 Any habitat designations; and, 2 Has limited ecological value. The Site does provide suitable habitat for a range of species including protected species such as badgers and dormouse. Habitats of higher value are trees, hedges and the riparian corridor associated with the River Otter, which would be unaffected by the draft allocation. Ottery St Mary is an inherently sustainable location for housing growth and the site is highly deliverable. It is anticipated to come forward in the early-mid Plan period. The Landowner strongly supports the allocation of land at Barrack Farm under draft Policy SD04 (Otry_01b) and is committed to working collaboratively with EDDC to ensure a robust policy context that supports the delivery of housing and employment on the Site. As is typical of a site subject to a draft allocation at Regulation 19 stage, there are some elements of the proposed land use quantum which require refinement; these are set out in the above representations and accompanying technical reports with the objective of ensuring the site's potential is optimised and contributes suitably to East Devon's housing need.

We trust this assists in refining draft Policy SD04 (Otry_01b) and would welcome minor updates on this basis, in accordance with the NPPF and other policies of the Draft Plan. Please do not hesitate to contact me or my colleague Sophie White should you require any clarification

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.:

In light of the above, we propose that the wording of policy SD04 with respect to Barrack Farm be amended to: “Barrack Farm (Otry_01b) This land at Barrack Farm, is allocated for around 90 new homes and up to 1.25 hectare of employment land provision, to be provided in accordance with Strategic Policy SP04. Archaeological assessment will be required prior to development commencing and will need to inform development proposals. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Development at this site should not fetter the potential for access to Otry_09, illustrating how both site entrances would work in harmony once both sites are delivered.” We also propose that the wording of policy SD04 regarding Land at Thorne Farm (Otry_09) is amended to reflect the need for joined up thinking in respect of access: Land at Thorne Farm (Otry_09) This land, which lies west of the town and adjacent to the sports centre and school, will provide around 90 new homes as well as space for an educational facility. Further flood risk assessment is required and an undeveloped buffer should be maintained to protect the County Wildlife Site and Ancient Woodland to the north west of the site. Development at this site should not fetter the potential for access to Otry_01b, illustrating how both site entrances would work in harmony once both sites are delivered”.

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

1.1 These representations are submitted on behalf of Mr M.J. Nancekivell and Mr R.P. Nancekivell ('the Landowner') in response to the East Devon District Council's (EDDC) Local Plan Draft 2020-2042 Regulation 19 Consultation Document (the 'Draft Plan'). They relate to the Landowner's interest in Ottery Saint Mary (OSM) at Gerway Farm (the Site, Plan 1), to the southwest of OSM, capable of delivering 150 homes.

1.2 The site comprises: 1 Land to the east, which is allocated for housing development (70 homes) in the Draft Plan (Policy SDo4 Otry_21) and referred to as the "eastern parcel". 2 Land to the west, which is unallocated but represents a viable and logical opportunity to delivery more houses (about 150 units across both land parcels), referred to as the "western parcel". 3 Additional land under the same ownership which is available for Biodiversity Net Gain and green/blue infrastructure to support the delivery of the housing allocation, referred to as the "additional land".

Plan 1: The Site

Source: The Richards Partnership. Reproduced from the Ordnance Survey Map with permission of Her Majesty's Stationery Office (c) Crown Copyright Licence no 100046803.

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1.3 The purpose of these representations is to: 1 Explain that the Council's assessment of housing need is flawed such that more sites need to be allocated. 2

Support land to the south of Ottery St Mary as a suitable and sustainable location for growth, as acknowledged by the draft allocation. 3 Promote land to the west of the site as an extension to the draft allocation. 4 Demonstrate the suitability and deliverability of the wider site for comprehensive development to deliver around 150 homes. 5 Comment on other policies in the plan insofar as they relate to the promotion of housing development on our Landowner's site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

In light of the above, we propose that the wording of policy SD04 with respect to Barrack Farm be amended to: "Barrack Farm (Otry_01b) This land at Barrack Farm, is allocated for around 90 new homes and up to 1.25 hectare of employment land provision, to be provided in accordance with Strategic Policy SP04. Archaeological assessment will be required prior to development commencing and will need to inform development proposals. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Development at this site should not fetter the potential for access to Otry_09, illustrating how both site entrances would work in harmony once both sites are delivered." We also propose that the wording of policy SD04 regarding Land at Thorne Farm (Otry_09) is amended to reflect the need for joined up thinking in respect of access: Land at Thorne Farm (Otry_09) This land, which lies west of the town and adjacent to the sports centre and school, will provide around 90 new homes as well as space for an educational facility. Further flood risk assessment is required and an undeveloped buffer should be maintained to protect the County Wildlife Site and Ancient Woodland to the north west of the site. Development at this site should not fetter the potential for access to Otry_01b, illustrating how both site entrances would work in harmony once both sites are delivered".

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

3.1 The Ottery St Mary Site Selection Report (February 2025) (SSR) identifies 15 sites for potential residential and commercial development in Ottery St Mary. The selection of sites for allocation within the SSR is completed in accordance with the published Site Selection Methodology. The SSR, and Draft Plan policy SD04, allocate: 1 Barrack Farm (Otry_01b): 70 dwellings, 1.25ha employment land; 2 Thorne Farm (Otry_09): 90 dwellings, educational facility; 3 Salston Barton (Otry_10): 20 dwellings; 4 Bylands (Otry_15): 8 dwellings; 5 Strawberry Lane (GH/ED/27): 60 dwellings; and, 6 Gerway Farm (Otry_21): 70 dwellings.

3.2 The Landowner is fully in support of the approach to allocate development in and around Ottery St Mary, a sustainable location. In response to the housing need assessment provided in Section 2.0 of this Statement and the settlement hierarchy established in policy SP01 of the draft Plan, Ottery St Mary can accommodate further growth in line with its Main Centre Status, assisting with delivery of the additional housing needed by EDDC. Strategic Policy PB06: Local Nature Recovery Strategy and Nature Recovery Network

5.23 Strategic Policy PB06 of the Draft Plan addresses the Local Nature Recovery Strategy and Nature Recovery Network.

5.24 The accompanying EA notes that the limitation of provision of off-site biodiversity provision only within the overall NRN could limit opportunities to deliver otherwise important ecology and biodiversity gains in alternative locations.

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5.25 The proposed allocation provides opportunities to protect and enhance habitats in the area, particularly the riparian corridor of the River Otter, and therefore complements Strategic Policy PB06.

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.: Land at Gerway Farm – Draft Allocation Otry_21

3.3 Part of the land under the Landowner’s control is allocated (Otry_21, see Plan 1 above) “for 70 homes” under draft Policy SD04. Our Landowner supports this policy subject to: 1 Capacity for all allocations should be consistently referred to as ‘around’ or ‘about’ (aligned with some of the other draft allocations) rather than fixing this at a set number, to build in the necessary flexibility and reflective of the fact that detailed design has not yet been undertaken; and 2 The allocation should be expanded to include the land immediately to the west (see Plan 1 for expanded allocation area) to deliver a total of ‘around 150 units’. This is covered under Section 4.0 to follow.

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(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.:

Land at Gerway Farm – The Expanded Allocation

3.4 The Ottery St Mary SSR considered the Landowner's interests under two separate site references – see GH/ED/29a and GH/ED/29b at Plan 2 below. Pg 10

Plan 2: GH/ED/29 Site

Source: Ottery St Mary Site Selection Report

3.5 The Council's assessment of GH/ED/29a (then draft allocated) and GH/ED/29b is the same for "infrastructure", "landscape", "historic environment", "ecology", "accessibility" and "contribution to spatial strategy". On this basis, and given that GH/ED/29a was found to be suitable for allocation, it would be consistent and logical to also allocate the expanded area proposed at Plan 1.

3.6 The Council has concluded in the SSR that GH/ED/29b should not be allocated because: 1 It forms an unacceptable extension into open countryside: Given the excessively large extent of GH/ED/29b assessed in the SSR, this appears to be a

reasonable conclusion. 2 It has inadequate access arrangements: Given the single point of access, and assuming the development of 200 units, this appears to be a reasonable conclusion. 3 It is an unacceptable large scale: If this point is linked to the extent of the red line and the ability to access 200 units off a single access, this would appear to be a reasonable assumption. However, there is no evidence that the scale of development would be unacceptable against other indicators, including ‘infrastructure’ and ‘accessibility’.

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Critically, if a smaller area had been assessed – such as the land subject to this representation – a different conclusion would arise. 4 The Council also identifies further reasons for not allocating GH/ED/29b but these fall away for the smaller area subject to these representations. For example, parts of the site are constrained but these are not insurmountable issues for the site extent now proposed for allocation. The SSR constraints can be addressed as: a The site is irregularly shaped and comprises grade 2 and 3 agricultural land: Whilst this is applicable to wider GH/ED/29b (i.e. the land to the south is largely Grade 2), the proposed expanded allocation area shown at Plan 1 is largely grade 3 agricultural land with some small areas of grade 2 agricultural land in the southern area of the land parcel. It is also important to confirm that the allocation extent in the Draft Plan (GH/ED/29a) contains a similar proportion of Grade 2 vs Grade 3 land, demonstrating this was accepted by EDDC. b Part of the site is within floodzones 2 and 3: None of our Landowner’s site is in flood Zone 3. A small part is within flood zone 2 (associated with low lying land) and we explain in Section 4.0 that any risks can be mitigated through reprofiling and a suitable drainage system. c

Potential access to Claremont Field would need to cross a band of floodplain: This does not apply to the promotion site because development can be accessed without requiring a new vehicular access to Claremont Fields; access can be taken from Sidmouth Road. The existing Public Right of Way will be retained and as per above any flood risk can be managed. d A small area of surface water flood risk crosses the site: A small area of surface water flood risk is within GH/ED/29a. Remaining surface water flood risk broadly follows the fluvial Flood Zones 2 and 3 that runs north-east to north-west across the northernmost part of the site, which can be managed as per above. e The HSE major hazard pipeline runs through the southern edge of the site and the consultation zone extends to cover approximately 4.2ha of the site (approx. 0.35ha of which is also floodplain). We have received confirmation from HSE that there are no implications for the expanded allocation site (Appendix 5). f Electricity wires cross the site and would need to be undergrounded: Electricity lines cross our Landowner’s ownership and can be re-routed or undergrounded at the application

stage. This ‘constraint’ would not preclude residential development. g It is very sensitive in heritage terms: We assume this is a reference to historic field enclosure pattern to the south of our Landowner’s ownership. As per draft allocation Otry_21, further evaluation will be needed but we explain below that geophysical surveys currently suggest no archaeological interests that would require preservation in situ. h It is visible in long range views: We understand that the Council might be concerned about the impact of development across the whole of GH/ED/29b. However, Otry_21 was found to be acceptable in landscape terms and the principles would apply to the expanded allocation area. We comment further on landscape and visual impacts at Section 4.0 below.

Pg 12

3.7 In assessing GH/ED/29b, the Council misdirected itself by not looking at this area at a finer grain. The constraints – and apparent weaknesses - are not equally applicable across the whole site. Notably, the constraints do not affect the expanded allocation area to the same degree and the site promoted in these representations is more akin to the assessment of Otry_21 and can therefore be allocated. Pg 13

4.0 Suitability of the Promotion Site for Allocation

4.1 The Landowner is proposing that Otry_21 is extended as shown on the framework plan below to form ‘Amended Allocation Otry_21’, delivering a total of about 150 houses. This is hereafter referred to as ‘the site’.

Plan 3 Framework Plan for Extended Allocation

Source: The Richards Partnership

4.2 The site is suitable for housing. The Vision Document (Appendix 1) explains that a well- conceived scheme can be delivered which responds positively to the site’s context, achieves ecological enhancement and creates an appropriate landscape setting. Overall, housing can be delivered on the current draft allocation (eastern parcel) and the western parcel. It would be possible to provide extensive landscaping. Beyond this, further to the west, a significant area of land could be utilised to achieve a well-connected network of publicly accessible green and blue infrastructure.

Landscape and Visual Impact

4.3 The Vision Document explains that: 1 Only limited parts of the site will be visible in views from the footpath network to the south. From most views, the site will be seen on the context of existing built development. 2 View from Sidmouth Road to the south would be occasional glimpses. The site is well screened by high hedgerow and roadside banks. 3 Views from publicly accessible locations in the wider landscape are well contained, screened by hedgerows/woodland block or viewed against the backdrop of existing development.

Pg 14

4.4 Extensive landscaping could be accommodated on site. Existing trees and hedges can be retained, managing the impact of development in the local context.

4.5 The site is located approximately 1.5km from the East Devon National Landscape. From its boundary, the town is seen in distant views. The changes at the site, viewed from the edge of the Natural Landscape would 'read' in the context of existing development. As a result, we would expect the special qualities that contribute to the landscape and scenic beauty of this part of the Natural Landscape to be conserved and that its setting would not be materially altered by this development.

Transport and Access

4.6 Connect Consultants has prepared a Highways and Transport Technical Note (Appendix 2). It explains that the site: 1 Is suitable for development because a range of facilities and services are readily accessible by walking, cycling, and public transport, meeting the requirements of draft Local Plan Strategic Policy TR01 (walking, wheeling, cycling, and public transport). 2 There is capacity in the highway network to accommodate about 150 houses with no unacceptable impact on the local road network. 3 Vehicular access can be achieved from Sidmouth Road. An initial design of a simple T- junction is achievable and suitable for about 150 homes. 4 A safe segregated pedestrian route can be created from the site along the western side of Sidmouth Road to connect to the existing pedestrian footway at Gerway Close, from where there is a continuous pedestrian route into Ottery St Mary. 5 Pedestrian routes within the site can accommodate the existing Public Rights of Way and link through to Claremont Field.

4.7 Detailed requirements for a travel plan/transport statements/transport assessments (draft Strategic Policy TR03) and regarding car/cycle parking and charging points can be addressed at the detailed design stage (draft Strategic Policy TR04: Parking standards - Residential).

4.8 The site is within the Aerodrome Safeguarding outline area, but residential development will not exceed three storeys, nor will it have high structures, and it will therefore not likely interfere with radio signals or create bird strike hazards.

4.9 In assessing Otry_21 and GH/ED/29b, the Council notes in the SSR that: “Sidmouth Road at this point is a reasonably wide C-class road, potentially capable of accommodating additional development and associated movements in itself. However, the road narrows significantly towards Sidmouth to the south and access into and through Ottery is constrained by narrow roads and a single route through the town centre. Further investigation may be required to determine if more significant highways improvements (bypass/distributor road) might be necessary. Development of the site has the potential to impact on Junction 29 of the M5, which suffers from congestion at peak periods.”

Pg 15

4.10 The Transport Technical Note explains that analysis has been undertaken (using DataShine Commute) to establish the likely trip distribution for about 150 houses. It confirms that traffic effects during the weekday AM and PM peak hours are likely to be in the region of: 1 An additional 64 vehicles in the AM peak and 59 in the PM peak are likely to travel on Sidmouth Road north of the Site, which will disperse within the road network in Ottery St Mary. This equates to an average of approximately one additional vehicle per minute, which is not likely to result in an unacceptable impact. 2 Only 10-13 additional vehicles are shown to travel on Sidmouth Road south of the Site during the AM and PM peak hours. Again, this is not likely to result in an unacceptable impact.

4.11 The Transport Technical Note concludes that satisfactory access can be achieved. The promotion site is deliverable from a transport and movement perspective. Heritage and Archaeology

4.12 There are no heritage issues above or below ground that would preclude the site being allocated. Of note; 1 A desk-based heritage assessment and geophysical survey of site GH/ED/29 (including the promotion site) were undertaken by the Council in 2023. They provide evidence of archaeological potential and suggest that the promotion site may have been part of the open field system associated with the town in the later medieval period. The field pattern survives in part to the south of the promotion site, but otherwise has been eroded through the removal of hedgerows to create larger fields for modern farming. 2 The geophysical survey recorded sub-surface remains of the former field boundaries within the promotion site. There is potential to restore some of

the lost boundaries as part of the proposed green infrastructure, presenting a heritage benefit. 3 There are no indications that any of archaeological features would be of the higher level of significance that would warrant preservation in situ.

4.13 In summary, as per the existing Otry_21, no heritage constraints have been identified that would prevent development on the promotion site. Ecology

4.14 The SSR explains that Otry_21 and GH/ED/29 would result in a predicted “minor adverse effect...(not significant)” on Ecology. The same conclusion applies to the expanded allocation i.e. the site.

4.15 The Ecology Appraisal (EA) (Appendix 3) confirms that the site is not affected by; i any habitat designations; and ii has limited ecological value.

4.16 It does provide suitable habitat for a range of species including protected species such as badgers and dormouse. Habitats of higher ecological value are trees, hedges, and the riparian corridor associated with the River Otter.

Pg 16

4.17 The initial Framework Plan shows that mitigation can be designed into the development, including the retention of trees and hedgerows, additional planting and the management of a significant area of green space to the west of the site for biodiversity gain. The need for further mitigation can be addressed at the planning application stage.

4.18 A protected belt of trees is identified along the western boundary of the wider site to be used for green space, and further protected trees in the northwestern point of the wider site, and many mature and veteran trees are noted within the SSR.

4.19 The site is located within the East Devon Pebblebed Heaths SAC HRA mitigation zone. There is an adopted strategic mitigation solution, The South-East Devon European Sites Mitigation Strategy, involving financial contributions, with which the Otry_21 and the promotion land can also comply (EA para 3.6).

4.20 There are no issues that would preclude housing development on the site. At least 10% Biodiversity Net Gain (BNG) in accordance with statutory requirements can be achieved given scale and control of the site. Emerging policies can be satisfied; 1

Strategic Policy PB01, protecting internationally and nationally important wildlife sites. 2 Policy PB03 of the Draft Plan, irreplaceable habitat and habitat features,

such as hedgerows, will be maintained. 3 Strategic Policy PB04, which sets out mitigation measures with respect to the Pebblebed Heaths Habitats Site would be adhered to in line with the South-East Devon European Sites Mitigation Strategy. 4

Policy PB07, which outlines design expectations for ecological enhancement and biodiversity in addition to BNG. 5 Policy PB08, which relates to the

accommodation of trees, hedges and woodland in built development. 6 Policy PB09, which outlines the approach to monitoring new planting schemes. Flooding and drainage

4.21 The Technical Note on Flooding, Water Efficiency, Green & Blue Infrastructure (Appendix 4) explains that: 1 A small area of land to the north of the site is within flood zone 2 and 3. The Vision Document shows that about 150 houses can be

developed on the site without any incursion into the flood zone. 2 There are pockets of land around the site boundary that are at risk from surface water flooding, but this is reflective of low-lying land and can be addressed through reprofiling and the introduction of suitable drainage systems. 3 Additional mitigation if needed, can be addressed by ensuring appropriate finished floor levels which can be fixed at the planning application stage. 4 Sustainable Drainage Systems will be utilised to control surface water runoff and ensure ecological benefits. The Vision Document shows scope for provision to the west of the site.

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5 Water efficiency can be addressed at the detailed design stage and can be achieved through the installation of reduced water fittings and water butts as needed.

4.22 There are no flood risk or drainage matters that would preclude development of the site for about 150 houses and any proposal would accord with the requirements of draft Strategic Policy AR01 regarding Flooding.

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.: Summary and suggested policy wording

4.23 The site is a deliverable and sustainable opportunity to help meet East Devon's housing in the early-mid Plan period.

4.24 The evidence above identifies; 1 The site is necessary to provide the additional housing numbers required for East Devon and could deliver about 150 new homes in total; 2 There will be no detrimental impact on the highways infrastructure; 3 The National Landscape is unaffected; 4 The site is well connected the town centre for pedestrians and cyclists; and, 5 Other technical policy issues relating to heritage, ecology and flood risk can be addressed at the planning application stage.

4.25 We propose that the boundary of allocation Otry_21 is as per the plan at Appendix 6 and that the wording of Strategic Policy SD04: Gerway Farm is amended as below (bold as additions and strikethrough as deletions): This Land at Gerway Farm, off Sidmouth Road, is proposed for about 150 houses and associated infrastructure 70 houses. Archaeological assessment is required prior to development. Flood risk assessment and measures to ensure that safe cycle and pedestrian access to nearby facilities can be achieved will be required."

Full name: Cara Chambers

Organisation (where relevant): Stantec

Other party name (if relevant): KCS Development

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: 6 Land west of Cadhay Lane (GH/ED/26)

6.1 Site Summary and allocation benefits

6.1.1 As outlined in Section 2 this site is a suitable, appropriate, and sustainable location for residential development.

6.1.2 The local plan evidence is predicated on the entire site being allocated for development. However, the evidence fails to recognise that a smaller area of the site is being promoted that being the eastern part of the site where it adjoins Cadhay Lane and the playing field such that the site boundary mirrors the proposed allocation to the north. It should also be noted that the draft allocation site to the north is further from local services and arguably less sustainably location than site GH/ED/26.

6.1.3 All potential technical matters can be addressed through typical scheme design. Furthermore, Ottery St Mary is a wholly suitable and sustainable location for further housing growth. Its sustainability is evidenced by its designation as an Area Centre in the adopted and emerging Local Plan.

6.1.4 It is noted the site is within a revised proposed draft 'Green Wedge', as proposed elsewhere in the current Regulation 19 consultation. Further analysis of this is provided in section 4 of this document, however, in summary, the revised Green Wedge is unsound and is neither logical nor supported by sufficient evidence.

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.: [Details please refer to the attachment page.16-20]

6.1.5 KCS would support a partial allocation of the site for residential development, namely the two fields in the eastern part of the site (as identified in previous representations and summarised here). This would deliver a number of significant benefits, including:

- Development would provide a strong defensible boundary to the edge of Ottery St Mary,
- It would include high quality landscaping and public realm works in-keeping with the edge of settlement location,
- The landscaping and planting offer additional benefits in terms of biodiversity net gain.
- Ecological features can be provided within the site and/or on adjoining land.
- The site is within the least constrained area around the town in landscape terms as shown in the submitted comparison document.
- Vehicular access can be provided, without severe effects on the local highway network. The provision of highway improvements through a north / south link road through the allocation site would be a benefit for the local area.
- Further residential allocation in Ottery St Mary will aid the vitalisation of the town centre and be in line with the settlement hierarchy,
- The opportunity exists to connect into good bus, bicycle, and pedestrian links to key local services, facilities and employment sites, and
- This site can help meet housing requirement in the first five years of the plan period,
- It would deliver notable affordable housing in an area of need.

6.1.6 The site is an entirely sustainable, logical, and deliverable site which can meet local housing needs in the short to medium term.

6.1.7 As discussed in section 5 of this document, Ottery St Mary has the capacity to deliver a similar amount of growth as Axminster due to its sustainability as a Main/ Area Centre. Delivery of further allocations would bolster housing supply and create more certainty around the delivery of the ‘headroom’ supply.

6.1.8 Further, the site is also comparatively equal or better, sustainable, deliverable, and suitable in comparison with other sites put forward for allocation in Ottery St Mary.

6.1.9 In line with the NPPF, the site is deliverable as set out in the below table

Criteria
Site Specific Achievable

The site is under option to KCS Development Ltd and the timetable for delivery of homes on site is within 1-5 years, subject to planning. Suitable

There are no technical issues with the site that cannot be mitigated against.

Furthermore, the site is located in a sustainable area with access to a number of amenities and public transport links. Available

There are no ransom strips or legal issues and/ or covenants affecting development at the site.

Full name: Cara Chambers

Organisation (where relevant): Stantec

Other party name (if relevant): KCS Development

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: 5 Land at Strawberry Lane (site GH/ED/27)

5.1.1 This site has been promoted to the emerging Local Plan for East Devon since the initial Issues and Options Consultation in early 2021. Since then, a number of further consultations have taken place and the Council's evidence base has been progressed.

5.1.2 Policy SD04 outlines housing allocations in Ottery St Mary and Land south of Strawberry Lane is included under reference GH/ED/27. Below is the text from the allocation policy for the site: This land lies south of Strawberry Lane and is proposed for 60 houses. This allocation will need to be supported by further flood risk assessment work, details of special measures to be taken to protect ancient trees and measures to ensure that safe cycle and pedestrian access to nearby facilities and Ottery St Mary town centre can be achieved. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

5.1.3 As stated previously, KCS supports the sound allocation of this land. The emerging plan is entirely sound in allocating the site.

5.1.4 All technical matters have been investigated and found that appropriate mitigation to any possible adverse effects can be addressed through the planning process. There is a current planning application (24/1716/MOUT) for outline consent for up to 65 dwellings, and almost all technical matters related to the development have been

resolved and/or are close to resolution. There are significant benefits associated with the proposals including affordable dwelling provision.

5.1.5 The planning application also considers the criteria set out in the allocation policy. Therefore, the application has been supported by Flood Risk Assessment work and measures to mitigate against this such as only locating built development in Flood Zone 1. Further, connectivity for pedestrians and cyclists has been a consideration in the design of the scheme with the existing PROW being retained but slightly diverted and an extra connection to the north of the site added. Further, it should be noted that no trees are to be removed for development.

5.1.6 Significant off-site highways improvement works are not required to bring this site forward. Highways modelling undertaken as part of the planning application demonstrated that the number of vehicle movements forecast to be generated by development at the site is low and can be accommodated.

5.1.7 There are sustainable access options for pedestrians/ wheelers both along Strawberry Lane and through existing developments, which link the site to the town centre and other nearby services.

5.1.8 The site can therefore make a meaningful contribution of the council's five year housing land supply position both immediately and within the local plan five year supply. Therefore delivery of this site is critical to the overall deliver of housing in East Devon and is fundamental to the soundness of the plan.

5.1.9 Further, in line with the NPPE, the site is deliverable as set out in the below table

Full name: Valerie ANSFIELD

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The average citizen is not in a position to verify this

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It is notable is that at the meetings attended and contributed to by residents and Town representatives, sites GH/ED/27 & Otry-1 O were not selected for development (for many reasons including what follows) but they have somehow been included at a later stage thus prompting questions about due process. Continued as attached

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.: Sites GH/ED/27 and Otry-10 should be excluded from development sites allocated by virtue of the process adopted AND their lacking in viability. Suitable sites for the right type of housing in the right location should be sought instead.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There's no indication that aspirations to provide such as suitable transport networks, education facilities, sports and recreation facilities can be

secured : simply requiring money of potential developers is only part of the implementation required. A comprehensive plan to achieve is required in all of this

There's no evidence in this that East Devon can require compliance from providers of Education, Transport Services etc that would meet the aspirations stated nor is doing so at present

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Christopher Bargmann

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are multiple issues with this allocation. The site is on agricultural land outside the designated built up area boundary which is contrary to both the EDDC Local Plan and the Ottery st Mary/West Hill Neighbourhood Plan.

There is a significant conflict of interests over this parcel of land. It is owned by Devon County Council who stand to gain financially (potentially significantly) from a future sale of this agricultural land if it is approved for housing developemnt. Commercial interests of the County Council cannot , and should not, be a driver for the allocation of unsuitable land when there are less controversial altenatives available in Ottery st Mary.

Access is a major problem with both Exeter Road and Cadhay Lane unsuitable for additional traffic. Potential access points will increase road safety risks. Proximity to the Kings School and Sports Centre are a significant concern wrt increased traffic volumes.

The property is a known flood risk - in particular the northern field where the brook suffered a major flood incident in 2008. Significant runoff from these fields onto Exter Road is also a regular occurence and will get worse if housing is allowed. Properties that are, or could be, impacted by runoff water/flooding are;

- The Ottery Sports Centre and AstroTurf sports pitch,
- The properties on Exeter Road, west of the Cadhay Lane junction,

- The Kings School,
- The Ottery st Mary Hospital,
- Thorne Farm and Thorne Farm Way,
- Portions of the Kings Reach housing development,
- Island Farm, and,
- The Finnimore Industrial Estate.

The long term visual impact of development on this site will be significant. The site is well above the existing build line and will be visible from numerous locations and viewpoints in the Ottery region. It will be detrimental to the appearance of the landscape. In addition the proposed scale of the housing development (±90 properties) is totally out of keeping with the rural setting of the site. It represents creeping urban sprawl into the rural environment surrounding Ottery st Mary which cannot be justified and the local infrastructure and services cannot support.

Approximately half of the Thorne Farm site falls within the Minerals Consultation Area defined around the outcrop of the Budleigh Salterton Pebblebeds (BSP) in the vicinity of Straitgate Farm. The BSP themselves are covered by a separate Minerals Safeguarding Area. The BSP are a principal source of sand and gravel in Devon, in particular because of the high quality crushable gravel content. Whilst the BSP are not geologically mapped as underlying the Thorne Farm site, they are mapped on the field to the west. Bedrock outcrop is rare and the presence of the BSP on the western side of the Thorne Farm site cannot be excluded. It is crucial to preserve mineral resources close to markets in order to meet sustainability and climate change requirements and this is enshrined in the Devon Minerals Plan. With expansion ongoing east of Exeter it would be short-sighted to sterilise a potentially viable sand and gravel resource by allowing the proposed development to go ahead. Development on the Thorne Farm site should be rejected as being contrary to the terms of the Devon Minerals Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The allocation of this land for housing is wholly unsuitable, it should be withdrawn as an allocation site. The

commercial interests of the County Council should not take precedent over the need for sensible development in Ottery st Mary

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Detailed above. the site is unsuitable for housing developemnt.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The voices of local people should be heard on issues that affect their communities

Full name: JeromeBossuet

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I find the housing targets too high and unrealistic for the capacities of Ottery St Mary's infrastructures. It does not reflect the local Ottery development plan with some areas that were defined as unsuitable by the local council and the population.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: With only one bridge and bottleneck at Wiggaton, road to Alington and roads to the East, traffic situation is already problematic. Some infrastructure eg the pedestrian bridge over the Otter broken for over a year and half means very dangerous for school children. GP, dentists, primary school oversubscribed, some high street shops closing, don't see the point of putting more houses. Disjointed strategy, and the well-being of population is not taken into account. Air pollution rising.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please consider realistic lower housing targets (see also housing stock) otherwise the town will lose its identity. Ottery target higher than Sidmouth, Seaton, Budleigh by far, why??

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Elizabeth Brown

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The average citizen is not in a position to verify this.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It is notable that at the meetings attended and contributed to by residents and town representatives, sites GH/ED/27 and Otry_10 were not selected for development (for many reasons including what follows) but they have somehow been included at a later stage this prompting questions about due process. Continued as attached...

NOT SOUND. This is huge concern that sites GH/ED/27 & Otry_10 are outside of the built-up boundary and remote, from the town facilities and therefore not a sustainable location. No adequate details have been released on the special measures that need to be taken to protect ancient trees and hedgerows and no details on the measures needed to ensure safe cycle and pedestrian access to nearby facilities and Ottery St Mary town center can be achieved. In addition, so far it appears that the flood risk evaluation has been done from a desk and relies heavily on investigations carried out 10 years ago in 2015. Furthermore, there was no remedial work carried out in the vicinity after flooding affected properties in the Salston Barton area in 2008. The flood water came from the direction of the proposed development. Kings School (Ottery St Mary) and Ottery Primary School are at capacity. Coleridge Medical Centre is struggling to meet the needs of existing patients.

The EDDC has failed to respond to any questions and road safety concerns posed by local residents.

The above points are some of the major concerns but closer scrutiny of the East Devon Local Plan 2020-2042 reveal hugely concerning lapses in both due diligence and due process. Namely:

- In the current local plan this land was inserted AFTER the consultation period, and was removed when a local councillor spotted it and described it as UNDEMOCRATIC.
- In the appraisal of the development parcels around the district this parcel was NOT appraised in the same way as all the other locations especially with respect to views from the protected landscape (AONB), narrow road width, lack of pavement access, dominates existing settlement from high ground, joins up a hamlet to a town, exacerbates flood risk - these criteria INDIVIDUALLY were enough to rule out land parcels in all other locations - and inconsistencies in the utilisation of the neighbourhood plan with respect to the green wedge and the preservation of hamlets.
- During consultation EDDC were informed in person and in writing that Salston is a hamlet, and it appears in their report of the consultation process.
- The Senior Planning Officer denied knowledge that Salston is a hamlet to the Strategic Planning Committee whilst they were in committee (meaning that the public could not offer a correction for the record) - this should have been an integral part of the officers' preparation for the committee meeting and surely one of the first steps of evaluating any planning proposal.
- A member of the public raised an official complaint about the unacceptable way that the committee had been misled - the EDDC response was to accept the error and explain it as the officers cannot be expected to know everything. This is their job, they SHOULD be expected to know basic details such as this, the EDDC response was

unacceptable . If something is written in u report by the planning officers then one could reasonably expect that they might subsequently refer to it in preparation for committee.

Hypothetical. untested and unconsultcd plans for a potential pavement access were given to the Strategic Planning Committee in support of the rational

- No-one has answer d the residents of Sulston with regard to whether the development will make road -conditions more dangerous for existing residents.
- -one can provide assurances that any measures to ensure that flood risk for the re idents of al ton will not be exacerbated in perpetuity by extensive development on th lope above our houses, even if we don't take account of climate change projections, since several Salston properties have a history of flooding. Future management of flood risk management measures associated with the proposed development site (flood retention) cannot be legally enforced in perpetuity
- It is hard to feel listened to if the issues that we raise during statutory consultation both in person and in writing, are consistently ignored, as the EDDC have demonstrated repeatedly as the draft strategic planning process has progressed. This implies that consultation is treated as a necessary part of the wider process rather than an opportunity for the public to input, and this is UNDEMOCRATIC.

For residents of Ottery St Mary and Salston the above list of unexpected divergence from due process, starting with the current Local Plan, implies that EDDC strategic planning officers had decided a priori in their stated aim to 'join Salston up to Ottery St Mary' by linking Salston to the very extensive new development of Kings Reach. It is also manifestly unfair to expect Salston residents to endure further noise and disruption, even at weekends, of construction after many years more than originally planned of living nearby to construction related disruption at Kings Reach, and lesser so at Salston Manor.

Planning Inspectorate need to uphold our objections - these local plans are flawed on a number of extremely concerning levels and need to be returned for amendment.

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.: Sites GH/ED/27 and Otry_10 should be excluded from development sites allocated by virtue of the process adopted and their lacking in viability. Suitable sites for the right type of housing in the right location should be sought instead.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There's no indication that aspirations to provide such as suitable transport networks, education facilities, sports and recreation facilities can be secured: simply requiring money of potential developers is only part of the implementation required. A comprehensive plan to achieve is required in all of this.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Lewis Carr

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Ottery St Mary has had an extremely high amount of development in the past 10 years, proportionately higher than neighbouring towns & villages. We have received no increase in services, in fact, we have received a significant decrease in services. In your FAQ's on why we need a local plan you state "In many cases communities have raised concerns about the impacts of development on the capacity of schools, doctors and other infrastructure, however these are common issues experienced by most communities not just in East Devon but across the country. The answer to this is for EDDC to work with infrastructure providers to deliver the infrastructure that is needed and where possible secure funding to support this". I have seen no evidence of this to date, so why should we believe this will happen in the future? The infrastructure needs to be put in place ahead of/alongside development, not trailing after when it is discovered there is no funding for these extra services.

In the past 10-15 years Ottery St Mary has lost its childrens centre (& the groups/advice they offered to new parents/families), it has lost its community hospital and Minor Injuries Unit, the bus service serving the town has been reduced, there is increasing pressure on the GP service and it can be extremely difficult to even make contact with the GP surgery, let alone make an appointment, there has been no increase in educational provision, the roads are in really bad condition - lots of pot holes and despite numerous complaints the extremely damaged speed bumps outside the Kings School haven't had a proper fix in over 10 years, one of the public footpaths eroded into the river and no solution has arisen to reopen this footpath, the footbridge over the river has been damaged/shut making it dangerous for both residents and Kings School children commuting to/from town and school, other services in the town are currently at risk/being reduced due to lack of funding. I have seen no evidence in the past 10 years of EDDC working with infrastructure providers to deliver required funding/improve

infrastructure and yet we are expected to believe that you will in the future. It feels like EDDC are determined to fill East Devon with houses with no thought to the future/no fight back to central government about required numbers/no thought for existing residents and the services/amenities a town does (or doesn't) have.

Section 106 money has so many limitations placed on it, it can't be used to help the organisations which most need help.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe the housing policy needs to be revisited prior to any decisions being made. There should be a legal requirement placed on all new homes builders to ensure that houses are environmentally sustainable - they should all have their own means of generating power either by solar panels or heat pumps, they should take up less land to fit more homes into the space we have (e.g. build taller rather than wider).

EDDC needs to look beyond immediate needs to the future - if you allow Land at Thorne Farm to be built upon (land which is currently allocated for educational or community purposes) then you immediately block the possibly future expansion of the Kings School & the leisure centre. Whilst The Kings School may not need to expand at present, if you continue to allow our community (& neighbouring villages) to continue to expand at the current rate, then the Kings School (& Ottery Primary School) will soon need to expand. If you allow building on this site then there will be no room for the school to expand and you will then need to find a much bigger site for either a new school or to move the current school to. It is a very short sighted vision. Added to this, residents of Ottery have been asking for many years for a swimming pool, an obvious location for this is next to the Kings School and Leisure centre. Again, build on this site and you remove that possibility completely in a very short sighted move.

During Covid, and then when the war in Ukraine started it made us all consider how, as a country, we need to be more self sufficient. Build on our farm land and take this away, you remove the ability for us ever farm that land again.

Ottery is not a big town like Honiton, Exmouth and Sidmouth. It has very small roads and on the occasions that one of the main routes in/out of Ottery are closed (which happens surprisingly regularly due to accidents, repairs, works) then there is utter chaos on the country lanes surrounding the town, with lorries, buses and tractors often meeting each other on narrow country lanes and getting completely stuck.

The roads in the centre of Ottery are not designed for the amount of traffic that they currently have, let alone more.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lewis Carr

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(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.: N/A

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.: Goes against the democratically approved Local and Neighbourhood Plans running until 2031.

Consider that in the Neighbourhood Plan, the built up boundaries and area zoned West of Kings School are protected until 2031.

Goes against the duty of the council to represent the wishes of their constituents.

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.: Scrap and work on a plan starting in 2031.

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.:
N/A

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Goes against the democratically approved Local and Neighbourhood Plans running until 2031.

Goes against the duty of the council to represent the wishes of their constituents.

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.: Scrap and work on a plan starting in 2031.

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.: N/A

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.: Goes against the democratically approved Local and Neighbourhood Plans running until 2031.

Goes against the duty of the council to represent the wishes of their constituents.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to look the council in the eye and see whether they can lie to my face that this represents the wishes of the constituents.

Full name: Daniel Clarke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site reference Otry_21 I would like to object to the development on this site. I think the site entrances on the Sidmouth road will make Sidmouth road very busy. Especially between 7-9am and 2-6 from school runs and people driving/returning from work. I know there is already lots of families living in ottery but as the schools are at capacity they are having to go to Sidmouth which again doesn't help with the busyness of the road. And during the summer months where tractors frequently go up and down the road with big trailers they already need to pull into the gerway close site just to let cars past as the road isn't wide enough. This is also the case for lorry's that we get. As there would most likely be a link through Claremont field estate that also links to the Sidmouth road it would make Claremont busy and that road also narrows in certain places. As iv already mentioned the schools are at capacity and would need expanding to cope with the extra houses and potential families looking for schools. The drs surgery is also at capacity and struggling with the amount of people in ottery as it is. Having only Sainsbury's as the only supermarket with a small car parking area that already struggles to cope with the amount of people it wouldn't cope with more people in ottery. Ottery population as nearly doubled in the past 20 years and already struggling with the amount of cars driving in and around ottery. The amount of wildlife that we hear from foxes, rabbits, owls, birds etc that live in the fields and nest in the hedgerows will have their habitat taken away and would have to move on to different location. We regularly get the same birds yearly that nest in the hedges that back on to the gerway estate and taking that away will impact on their population. I know there is a need for more housing but that doesn't mean it's ok to just build anywhere and everywhere.

Full name: Sue Roundhill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: If there are many more houses built in Ottery St Mary the infrastructure will be at breaking point. We haven't the facilities and the roads in the centre of town are already getting blocked. The Doctor's Surgery is overwhelmed and it is almost impossible to get an appointment to see a doctor. The schools are overcrowded and will find it difficult to accommodate extra pupils. The lack of parking around The King's School is getting out of hand. More and more pupils are parking their cars round Thorne Farm Way. As the year goes on more pass their driving test & the roads become crowded with cars. When the school day has finished the roads round Thorne Farm become clogged with cars picking up their children. We avoid trying to leave the estate at these times.

The infrastructure of Ottery must be improved before too many more houses are built.

Full name: Martin Stockley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: 1

The adequacy of local infrastructure has to be addressed as a consideration within any development proposals. The Primary School is near capacity and the medical centre is already struggling to cope with its existing patient load. Parking in the town centre is already very tight at busy times, as is traffic flow through the town. Will the Local Plan deal specifically with these issues, envisaging as it currently does a significant increase both population and traffic? Sewerage is another factor that will require careful assessment.

2 a) Regarding development on site Otry21, Policy OL10 says that development will not be permitted on Grades 1, 2 or 3a agricultural land except in exceptional circumstances. It seems doubtful that circumstances could be sufficiently exceptional to justify the proposed development at Gerway Farm as a priority over other options, particularly as a large number of grade 3 sites were offered around Ottery in the call for sites. By way of recent background, over the past seven years the Grade 2 field in question has been regularly fertilised and has grown at least one full crop of maize after ploughing; in the years when the farmer has chosen instead to sow or leave it to grass, it has produced several successive hay crops in each growing season. It is clearly a potentially highly productive piece of agricultural land. It has also been used, occasionally and on a temporary basis, to graze sheep. I note that one of the grounds for rejection of Appeal Ref: APP/U1105/W/24/3336475 (Land East of Sidmouth Road, Ottery St Mary EX11 1PW) by the Planning Inspector was because it contravened the then Local Plan policy in precisely this way.

b) There are already two traffic issues on the Sidmouth Road between the proposed site at Otry21 and Ottery town centre. One is where the road narrows just

north of the entrance to Gerway Close where any large vehicles - tractors, buses, lorries etc - cause oncoming traffic to stop or reverse. The other is Tip Hill where: a) traffic has to wait/queue for oncoming vehicles to clear the parked cars at the side of the road and b) perhaps more importantly, the road past Luxtons is barely wide enough for two cars and has a pavement on the east side which narrows down to little more than 2½ feet width in places. Pedestrians are obliged to step into the road in order to pass one another. Vehicles pass so close to the footway as to create a hazard, and my wife is certainly not alone in having been hit by the wing mirror of a passing car. It is into this already constricted environment that the proposal to develop site Otry 21 would insert a further 100 or more additional vehicles and pedestrians. This is on top of the inevitable extra use arising from proposed new developments in other parts of Ottery, whose residents are bound to choose to drive this way to reach, for example, Sidmouth or the local recycling centre at Bowd. Anyone who uses this stretch of highway regularly knows that further development along the Sidmouth Road is simply not sensible.

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Otry_21: The proposed development of 70 homes on such a small site is inappropriate, not least given its rural setting and its location far from town centre facilities. Otry_10:

The site is not suitable. There are flood risks (surface and river). Access roads are unable to take any further traffic movements and there is no satisfactory pedestrian route. Otry_01b: Part of this site is currently an active farm, a centre of employment. It is not clear how the site can accommodate the new employment allocation for Ottery St Mary and additional housing. Further, the proposed housing density of the development is excessive. Otry_09: Flash flood risks at the northern site boundary which are likely to increase due to the planning approved quarry development must be addressed as must the down-stream impact on the existing Thorn farm estate, not least due to the inevitable loss of undeveloped grassland should approval be granted for Otry_09.

Otry_15: The proposed site is too far distant from town centre facilities to be viable.

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposals are poorly developed. Notwithstanding the objections raised to ‘edge development’ at large, specific issues arise as follows: Much of the Town’s infrastructure and services are already at capacity and no mention is made in your proposals for expanding provision. The GP surgery is overloaded, as is off-street parking provision, the central road system (Broad Street to Gold Street) cannot cope with current traffic volumes, there is not the capacity to provide for dedicated cycle lanes and pedestrian footways (where provided) are substandard. There is little or no opportunity for further employment growth: people will need to travel to Exeter contrary to policies intended to address the climate emergency. The distances and deep-valley topography means that most will drive from the proposed housing sites to town-centre facilities, contrary to policy objectives addressing the climate emergency. Recent housing developments have increased provision by some 25%: to add a further 318 dwellings is excessive.

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: DEVELOPMENT IN THE TOWNS AND VILLAGES The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution. Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

SD04 OTTERY ST MARY The proposals are poorly developed. Notwithstanding the objections raised to ‘edge development’ at large, specific issues arise as follows: Much of the Town’s infrastructure and services are already at capacity and no mention is made in your proposals for expanding provision. The GP surgery is overloaded, as is off-street parking provision, the central road system (Broad Street to Gold Street) cannot cope with current traffic volumes, there is not the capacity to provide for dedicated cycle lanes and pedestrian footways (where provided) are substandard. There is little or no opportunity for further employment growth: people will need to travel to Exeter contrary to policies intended to address the climate emergency. The distances and deep-valley topography means that most will drive from the proposed housing sites to town-centre facilities, contrary to policy objectives addressing the climate emergency. Recent housing developments have increased provision by some 25%: to add a further 318 dwellings is excessive. Otry_21: The proposed development of 70 homes on such a small site is inappropriate, not least given its rural setting and its location far from town centre facilities. Otry_10: The site is not suitable. There are flood risks (surface and river). Access roads are unable to take any further traffic movements and there is no satisfactory pedestrian route. Otry_01b: Part of this site is currently an active farm, a centre of employment. It is not clear how the site can accommodate the new employment allocation for Ottery St Mary and additional housing. Further, the proposed housing density of the development is excessive. Otry_09: Flash flood risks at the northern site boundary which are likely to increase due to the planning approved quarry development must be addressed as must the down-stream impact on the existing Thorn farm estate, not least due to the inevitable loss of undeveloped grassland should approval be granted for Otry_09. Otry_15: The proposed site is too far distant from town centre facilities to be viable.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: See response to Q2(b)

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See response to Q2(b)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I have no idea and am therefore neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Nancekivell

Organisation (where relevant): Luxton's Dairy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The developable are in this instance should mirror the development on the opposite side of the road (Otry 09) The 1.25ha of industrial should be as far west as reasonable possible as to not interfere with any residential areas.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The developable are in this instance should mirror the development on the opposite side of the road (Otry 09) The 1.25ha of industrial should be as far west as reasonable possible as to not interfere with any residential areas.

In the paragraph it stated it must complement and work with Otry 09 with regard to access, the access to Otry 09 includes a suggested roundabout which is to the west of Otry 01b and would not be any good unless the site Otry 01b was extended, See attachment.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am keen to help make the area develop in a meaningful and sensible manor

Full name: Kerry Kennell

Organisation (where relevant): Ottery St Mary Town Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: GH/ED/27 – consideration must be given to the topography of this site. There is a 5 metre drop to existing houses. This site needs to be visited in person to fully understand the concerns. Is there any sight of the tests that have been completed regarding flooding? Level 2 SFRA has been undertaken for Otry_10 and a sequential test completed for Strawberry Lane and Salston Barton but the results have not been published.

What happens if a site is included but it is then found to be unsuitable? Does that cause the land supply to be questioned? It was felt that additional houses would be provided through the proposed new town but there is not enough information regarding what this would entail.

Otry_21 – there are access problems with this site and no nearby facilities without walking into town. Sustainable sites should be on the other side of town – not this side.

Ottery is a Tier 2 settlement – there is no train station and the existing ‘regular’ bus service is not regular enough for the existing residents.

Otry_09 – water pours onto the road from this site. The Council feel it is essential that there is focus on the development of enhanced sustainable travel modes. All facilities should be accessible within an accessible distance.

A member of the public asked “What is the Council aspiring to in relation to industrial units?” The Council hasn’t discussed this but this is something that can be included in the new Neighbourhood Plan. This will be discussed once the Neighbourhood Plan review is commenced. Otry_20 is not included in the sites for Ottery (Strategic Policy SD04 Pages 85-87) despite this being part of the Ottery St Mary parish and during the Strategic Planning Meetings only Ottery St Mary Town Council could speak in relation to this site. This site is in fact included in the Feniton section (Strategic Policy SD18 Page 98). The Council feel that this is misleading to those wishing to comment on the plan as it isn't transparent that that site is in Ottery Parish. The Council is also concerned that no numbers have been allocated how many houses could be built on this site. The proposal to put industrial units/employment to North nearer the existing houses and new houses further away to the south would mean that the new houses would be further away than the required meterage to walk to the local facilities making the site too remote. The Council are extremely concerned that this proposal involves removing an existing orchard.

Otry_15 – would increase traffic through town. There is currently no footpath on Slade Road and there should be an improvement to the footpath infrastructure before any development takes place.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Kerry Kennell

Organisation (where relevant): Ottery St Mary Town Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Sites are only accessible down the private drive maintained by residents. No meaningful attempt to address infrastructure – 483 houses in the next 20 years. Otry_10 – 20 houses – concerns regarding soakaway and power lines. The Council do not agree this is sound. No improvements for existing town – all improvements are for new developments. No information on climate change improvements or how they could be achieved.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land at Thorne Farm (Otry_09) - We reiterate our previous comments regarding the site being adjacent to the Cadhay Bog so the policy should specifically require BNG which helps to expand the nature corridor.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

GH/ED/27: Consistent with the recommendations of the Site selection report, and as for site Otry_10, should pre-commencement archaeological survey be required at this site?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: GH/ED/27: Consider introducing requirement as per adjacent site Otry_10.

SD05

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Devon County Council objects to allocation Seat_13a until further archaeological work is undertaken. Before site Seat_13a at Seaton is allocated in Policy SD05, further archaeological work is required to understand the archaeological resource to determine the suitability of this site for future development as it lies in an area of known high archaeological potential to the north and adjacent to the site of a nationally important late Iron Age farmstead and Roman villa that are protected as a scheduled monument. The County Historic Environment Team is able to provide detailed advice on the extent and scope of the archaeological works required in order to determine the suitability of the site for allocation for development.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To clarify access requirements, DCC requests that the paragraph relating to the Seat_03 and Seat_05 allocations be amended to read: “Will need to come forward as a co-ordinated and comprehensive development that delivers the proposed large-scale mixed-use development on the northern edge of Seaton and seeks to deliver the long-standing need for a football pitch as part of a viable package of planning obligations. A harmonised vehicular access will need to be provided off Harepath Road.”

Full name: richard ayre

Organisation (where relevant): baker estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This is unnecessary and is likely to be misinterpreted by some as requiring all to come together at the same time when that is not necessary or even desirable. All of SEAT_05 and part of SEAT_03 has a committee resolution to approve a development of up to 130 houses and a sports pitch. This should not be prevented from coming forward without the remainder of SEAT_03 although of course it must be ensured that the remainder of the allocation is capable of coming forward in conjunction. This part of the policy should either be deleted as being unnecessary and potentially unhelpful or it could be re-worded to make it clear that parts of the allocation may come forward at different times and that is acceptable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Ideally deleted as not necessary and capable of multiple interpretations.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: we have an interest in both these areas and want to make sure the local plan policies make it deliverable.

Full name: richard ayre

Organisation (where relevant): baker estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The reference to the 55 metre contour is an unnecessarily rigid requirement which does not take into account the type of housing (e.g. bungalows or houses), ridge heights, finished floor levels and potential landscaping proposals alongside. The assessment should be to work with a Landscape and Visual Assessment to produce an acceptable design and landscaping without unnecessarily rigid requirements being inserted into the local plan. A contour as a guide may be helpful but not a blanket requirement. Our preference is to delete the reference but an alternative may be to re-word so that it is a guide rather than a fixed parameter.

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.: Omit the reference to the 55 metre contour and reword to ensure that the extent and type of development is informed by an LVIA.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you

consider this to be necessary.: We have an interest in this land and want the best scope to consider the detail through full assessment at application stage rather than an arbitrary restriction imposed in the local plan. The wording is best considered and agreed at the examination.

Full name: richard ayre

Organisation (where relevant): baker estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(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.:

There does not need to be and should not be an assumption that the access will come from Poplar Tree Drive. An access from Lime Way should be very achievable with a suitable carriageway width and footpaths both sides to access a development of 40 houses safely and with no material impact on any existing junctions. Accessing via Lime Way in many ways could indeed be preferable and require less engineering than from Poplar Tree Drive and so will have better environmental and amenity consequences. The intention will be to produce more information on this for the examination but this representation seeks to ensure that a Lime Way access should not be ruled out and indeed could specifically be included in the allocation policy at least as an option.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It specifies an access which may not be suitable or at least could be less preferable than an alternative means of access.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Access options off Lime Way should also be explored at planning application stage so this can either be dealt with by omitting reference to Poplar Tree Drive or specifying Lime Way as an access option.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: We have an interest in this land and hence would like to ensure that the local plan policy makes it deliverable.

Full name: Mathew Dalton-Aram

Organisation (where relevant): Dalton-Aram Planning Limited

Other party name (if relevant): Mr J Werb

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(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.: N/A

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 LPA's decision to exclude Seat_11 from the emerging local plan is not considered to be correct.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The Site Selection report for Seaton highlights that Seat_11 'is not within or adjacent, or otherwise well-related, to Seaton.' However, this is not correct.

Firstly, Seat_11 is to the immediate north west of Seat_02 'Land at Barnards Hill Lane' which is allocated for 40 dwellings within the emerging Local Plan. Therefore, Seat_11 is adjacent to a proposed strategic housing allocation and well-related to Seaton under the emerging Local Plan.

Secondly, there are material circumstances that are different to when the LPA conducted its assessment of the site under the Site Selection report. The site now has a

extant planning permission for the construction of a dwelling. Planning permission was granted permission 22/2582/FUL (appeal ref. APP/U1105/W/23/3332347). The appeal inspector found the site to comprised previously-developed land within a sustainable location that is well related to the town's services and facilities. The Inspector also found that development on the site would not have a harmful impact on the landscape, ecology, trees, residential amenity or the surrounding highway network. Seat_11 is also not within the Green Wedge (unlike Seat_02) and would have no impact on the coalescence of nearby settlements.

Planning permission for the construction of a second dwelling on Seat_11 has also been submitted to the LPA at the time of writing this representation.

It is, therefore, considered that Seat_11 should be allocated within the emerging Local Plan for housing development.

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.:
N/A

3(b). If no, please give details 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 LPA's decision to exclude Seat_11 from the emerging local plan is not considered to be correct.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: The Site Selection report for Seaton highlights that Seat_11 'is not within or adjacent, or otherwise well-related, to Seaton.' However, this is not correct.

Firstly, Seat_11 is to the immediate north west of Seat_02 'Land at Barnards Hill Lane' which is allocated for 40 dwellings within the emerging Local Plan. Therefore, Seat_11 is adjacent to a proposed strategic housing allocation and well-related to Seaton under the emerging Local Plan.

Secondly, there are material circumstances that are different to when the LPA conducted its assessment of the site under the Site Selection report. The site now has a extant planning permission for the construction of a dwelling. Planning permission was granted permission 22/2582/FUL (appeal ref. APP/U1105/W/23/3332347). The appeal inspector found the site to comprised previously-developed land within a sustainable location that is well related to the town's services and facilities. The Inspector also found that development on the site would not have a harmful impact on the landscape, ecology, trees, residential amenity or the surrounding highway network. Seat_11 is also not within the Green Wedge (unlike Seat_02) and would have no impact on the coalescence of nearby settlements.

Planning permission for the construction of a second dwelling on Seat_11 has also been submitted to the LPA at the time of writing this representation.

It is, therefore, considered that Seat_11 should be allocated within the emerging Local Plan for housing development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(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.: N/A

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 Site Selection report for Seaton highlights that Seat_11 'is not within or adjacent, or otherwise well-related, to Seaton.' However, this is not correct.

Firstly, Seat_11 is to the immediate north west of Seat_02 'Land at Barnards Hill Lane' which is allocated for 40 dwellings within the emerging Local Plan. Therefore, Seat_11 is adjacent to a proposed strategic housing allocation and well-related to Seaton under the emerging Local Plan.

Secondly, there are material circumstances that are different to when the LPA conducted its assessment of the site under the Site Selection report. The site now has a extant planning permission for the construction of a dwelling. Planning permission was granted permission 22/2582/FUL (appeal ref. APP/U1105/W/23/3332347). The appeal inspector found the site to comprised previously-developed land within a sustainable location that is well related to the town's services and facilities. The Inspector also found that development on the site would not have a harmful impact on the landscape, ecology, trees, residential amenity or the surrounding highway network. Seat_11 is also not within the Green Wedge (unlike Seat_02) and would have no impact on the coalescence of nearby settlements.

Planning permission for the construction of a second dwelling on Seat_11 has also been submitted to the LPA at the time of writing this representation.

It is, therefore, considered that Seat_11 should be allocated within the emerging Local Plan for housing development.

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 articulate the reasons why Seat_11 should be allocated within the emerging Local Plan and to provide evidence that could not be submitted at earlier stages of the plan's production (i.e. the grant of planning permission) subsequent to the consultation of the emerging local plan.

Full name: Alan Sydenham

Organisation (where relevant): Herridge Property Consulting

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: We act for the owners of Seat 02 - Land at Barnards Hill Lane, Seaton and they have re-confirmed the site's availability and suitability for the proposed development of new residential dwellings during the Plan period.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
We act for the owners of Seat 02 - Land at Barnards Hill Lane, Seaton and they have re-confirmed the site's availability and suitability for the proposed development of new residential dwellings during the Plan period.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: We act for the owners of Seat 02 - Land at Barnards Hill Lane, Seaton and they have re-confirmed the site's availability and suitability for the proposed development of new residential dwellings during the Plan period.

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.: We would be happy to attend the hearing session, if it

was deemed to be appropriate to answer any queries that may arise in relation to the proposed allocation.

Full name: Amanda Barns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We wish to state we are totally opposed to the proposed development of the Green Wedge between Colyford and Seaton. There is absolutely no need to repeat all the objections voiced by so many before or the reasons why it should not go ahead. Please please please listen to local people and put their concerns and the importance of saving a beautiful part of this area before the greed of profit making developers who just couldn't care less. Do the right thing and you will have the gratitude and trust of local people for all time!

Full name: Judi Brewer

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I believe that the emerging Plan needs to be amended to ensure continued protection of our natural environment and Green Wedge and know that the present infrastructure of Seaton can in no way support further housing as stated the adopted Plan. It stated that: “community facilities, school, health, social and cultural, are seen as borderline or inadequate with no capacity to serve additional residents”. I hear many people complaining that they cannot get a doctor's appointment and one of the local surgeries has stated in the past month that they could not cope with more patients. It is also impossible to find an NHS dentist in the area; we have waited 3 months without a dentist and now have to go PRIVATE at exorbitant prices.

The adopted Plan stated in 2013 that “priority will be given to the enhancement of the environment and the promotion of business opportunities within the Town Centre to improve the attraction of the town for residents, visitors and businesses.” There is no longer any mention of enhancing the environment or supporting the town centre in the new Plan. Why the change??

The emerging Plan no longer commits to policies for the conservation, enhancement and sensitive management of the landscape and simply states: “Seaton is set within a stunning natural environment with the coast to the south, Seaton Wetlands along the eastern boundary, and the East Devon AONB located beyond to the east.” Again, why the change?

The adopted Plan states: We will restrict any further significant housing developments beyond the existing Built-up Area boundary Ensure that the integrity of the wildlife and habitats sites adjoining and near the town are not compromised..... Extend the network of green links within the settlement and to surrounding countryside and settlements. There will be limited housing development in the short term beyond

that already proposed in the regeneration area. The New Plan seems to completely ignore all of this!

Seaton has increasingly experienced flooding east of Harepath Road and at Seaton Wetlands Nature Reserve. Any development on the Green Wedge would inevitably result in further flooding of the Reserve and would put its future as a significant tourist attraction at considerable risk.

I could go on and on but lack the time. Please reconsider all these complete turn arounds which will be disastrous for Seaton and for the future of those living in this beautiful area.

Full name: Margaret Leppard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Introduction I have previously found the use of Commonplace clunky. Furthermore Commonplace tightly frames the consultation in terms of the council and central government asking the ‘first questions’. The programme also limits narrative of the lived experience of current residents. Place making procedures value these narratives. My comments in this document refer primarily to Seaton (level 2 settlement) and to planned housing sites, the local environment and economic development. I object to the inclusion of SEAT_02, 03, 05 and _13a in the EDDC Strategic Plan for the following reasons. National and local government’s approach to housing The national focus, particularly in recent months has been on numbers of houses to be built. This approach fails to ensure that the right types of houses are built in the right place. Government depends on commercial house builders who in turn, depend on building estates of similar properties on sites that yield economies of scale. Similar calculations limit the number of social housing units that are included in developments. Should economic conditions and supply lines change during the course of development work, social/affordable housing units are first to be reduced or abandoned. Throughout the country, there is housing stock that is abandoned and deteriorating; properties purchased and kept empty until ‘market conditions are more favourable’; second homes some of which are constantly in use by ‘together-apart’ families; second homes used as family holiday homes/ holiday lets and increasing numbers of properties used for short term lets and Air B&B. Current legislation and tax regimens lack power to mobilise these properties for those in genuine need of housing. Central government and councils, including EDDC, need to achieve a more equitable balance between local housing needs and the tourist market. Furthermore, the high proportion of holiday lets in an area with a constant throughput of visitors threatens the development of social capital and health among permanent residents. The numbers of similar 3-4 bedroom properties that developers create also fail to meet the needs of residents. For example, in Seaton there is significant need for social housing. Local working age residents are

primarily involved in hospitality, retail and some are carers. These are not high paying forms of employment. 3-4 bedroom new build houses are unlikely to be affordable for this demographic. Also in Seaton (and nationally) there is a need for different types of housing that meets the needs for multigenerational living; for disabled residents requiring easy access and internal adaptations; for small units for single occupancy. Simply building more numbers on 'same old, same old' estates will not work for community members! Innovative use of existing housing stock requires council officers and legal teams. Importantly it is only now that the national government acknowledges the lack of builders for new builds, repair and renovation. Not all councils have inspectors and officers to monitor and follow up, access, repair and renovate existing housing stock. There is a need for government and councils to both think and act in radically different ways about equitable housing. Infrastructure first Continuing to place the development cart before the infrastructure horse at every level only leads to a downward spiral in overall human and environmental wellbeing. I join with other contributors to this consultation to highlight the paucity of health services; primary and secondary education; transport and highways; surface water and sewage systems to support new development. With experience of internal residential flooding I highlight that tertiary technical education for essential building trades and technicians to ensure resilient housing design; ongoing monitoring and maintenance of common areas and sustainable urban drainage systems (SUDS) has received little attention. Therefore development of SEAT_02, 03, 05 and _13a threatens existing adjacent properties and environment. Legislative infrastructure also needs change. In the context of climate crisis; nature based solutions to address flooding; and top down imposition of housing targets, national legislation needs updating in relationship to land registry, riparian rights and responsibilities and use of water courses. Policy dissonance - where do priorities lie? Nature based tourism? Seaton along with other areas in East Devon promotes itself as a destination for nature based tourism. However, the draft Strategic Plan still proposes SEAT_02, 03, 05 and _13a for development. Other contributors to the consultations have commented on the impact of these sites on the local environment and ecology. The Seaton Tramway has recently invested in an additional stop for tourists to access the wetlands. However recent planning applications have not included any visualisation data from the top of the tram or from the new stop. How can we genuinely promote nature based tourism when the view to the west is of housing estates? Also visible from the B3172 and Harepath Road! Finally, flood risk In the same way that we lack technicians and legal instruments to deal with adolescent drainage technologies, I argue that recently published research (see below) demonstrates that planning guidance as it relates to SEAT_02, 03, 05 and _13a is behind the curve in relation to climate change and flood risk. In the course of my experience with field based SWW and DCC Flood and coastal risk and highways staff they do their best in a resource and planning guidance constrained workplace. This carries its own personal stress toll. However, development before infrastructure in economic terms simply externalises

costs onto the ‘little people’ be they flood victims or junior staff. Beware of blindfolded decision making about strategic planning for SEAT_02, 03, 05 and _13a when You do not have access to key upcoming reports ‘Water cycle report’ (EDDC) and “Assessment of flood risk from surface water and ordinary watercourses in Seaton’ (DCC) A recent Planning committee based decisions on Google Maps Street View that excluded visualisation of critical SUDS receiving watercourses in spate. Water attenuation across the sites is likely to be critically dependent on poorly maintained attenuation basins and permeable paving (and water butts?)

Source: <https://www.susdrain.org/delivering-suds/using-suds/suds-principles/management-train.html> despite the challenging context of

- increasing short duration high intensity rainfall;
- infiltration being excluded from the SUDS train because of the underlying local geology and finally,
- limited effective legal instruments and qualified technicians exist to ensure effective ongoing maintenance of common areas and SUDS. May you be wise in your decision making!

Full name: Sally Marshall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am upset to see that land opposite Axeview Drive in Seaton is still on the list for development. A year ago myself and other local people spoke out about this proposal at a town council meeting. I would like to ask you if any of our objections have been taken into account?

1. Flooding. When it rains heavily the water comes down from the field and through the hedge in a waterfall and runs down the road like a river.. It pools up in our house entrances.

Both my self at 21 and my neighbours at 23 have had our entrances relocated to the middle of the house as a preventative measure.

If the field and the trees are not there to soak up the water then where can it go?? The answer is into our homes.

I have spoken to the farmer who currently rents the field and he explained that there is also a natural spring on the hedge line that also over flows during heavy rain.

Building construction will cause an extreme amount of mud, debris and extra water to be sent down our road and on to the busier Barnards Hill.

The increased run off from new builds will cause more potential flooding as the water won't have anywhere else to go but down our hill and to the houses along Barnards Hill.

2. The Sewerage system.

The sewerage system for our house is 40 plus years old. Adding an extra 30 plus houses to this is surely not acceptable or safe ?

In 2021 the construction of Rodgers Way caused an overflow of the sewage system that meant that number 17 Axeview Road was so badly damaged by sewage water and waste flowing into their home. It was too much for the system to process. The elderly occupants had to stay in a hotel for many months whilst the damage was repaired.

Mrs Margaret Leppard of Seaton Floodworking Group has actively opposed this proposal on these grounds. The flood threat is real and very frightening.

3. Mental health and wellbeing.

Even the idea of this development is causing extreme stress to residents. I myself am losing sleep and constantly worrying about it. We are a small cul de sac of 23 houses. The top of our road becoming a building site entrance is a horrifying thought. All that noise, dust, mud and constant construction traffic for months and months..

Then afterwards the increased traffic flow of 80 plus cars going up and down our road will turn this quiet street into a busy road.

What are the plans for this. Where is the proposed site entrance? Do you then plan to have full car access through our road or pedestrian only ?

3. The cul de sac ends with a Devon bank. This is surely protected under the Hedgerows protection act 1997. It is full of wildlife and encompasses a veteran ash tree.. I have contacted Devon County Council and the Environment Agency to advise them of this threat. The green wedge contains a number of trees, many oaks, one of which is protected. The government suggests a buffer zone of 15 times the circumference of the trees girth to protect the roots.

4. The Roman villa in Honeyditches field. The field above Axe View is also known as a Roman field. The current farmer had told me that he regularly finds Roman pottery in the field. I have contacted Alice MacLeod of Historic England to advice of this possible planning application.

I would ask the council to please look out for its residents and help them to sleep easy at night by rejecting this proposal.

Thank you for taking the time to read my letter and I look forward to receiving your feedback.

Full name: David Morgan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(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.: Strategic Policy SD05: Seaton and its development allocations (pages 87-89). Support of the exclusion of Sites Seat_01, Seat_08 and Seat_10 from the East Devon Local Plan Regulation 19 as future development sites.

Site: Seat_01

I would like to support the decision that site Seat_01 has not been allocated as a future development site for housing or employment purposes in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'. The previous 'East Devon Local Plan (Regulation 18) – consultation feedback report – July 2023' (page 192), 'East Devon Local Plan Site Selection Report Seaton' (pages 8-13), and earlier 'Appendix 2: Site Selection – Interim findings at Tier One and Two Settlements' document (2022), as well as the decision of the Strategic Planning Committee at their meeting held on September 11, 2024, all came to the same conclusion in relation to site Seat_01 not being suitable as a future development site. As has already been identified for this site, Seat_01 is a Greenfield site with a rising character on the western boundary of the town. Its elevated character means that it can be seen from multiple viewpoints such as the South West Coastal Path, Axe Cliff Golf Club on the eastern boundary, the Area of Outstanding Natural Beauty (Strategic Policy OL02) to the east of it and from the top of Seaton Hole. Therefore, any development on this site would have an adverse impact on the topography and undeveloped skyline on the Western boundary of Seaton. Seat_01 also serves as an important fire break between the built up area and the adjacent woodland, which itself has no vehicular access point from Bunts Lane. Therefore extending the current built up area boundary to include Seat_01 would reduce this open

buffer as a protection. The site also provides a natural habitat for an abundance of different wildlife species and enables their movement to and from the neighbouring woodland in Bunts Lane. Seat_01 is also a well known corridor used by bats, being in the Beer Quarry & Caves Special Area Conservation zone. In summary, I continue to support the decision that site Seat_01 has not been allocated as a future development site for housing or employment, and for that reason, has not been included in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'.
Site: Seat_08

I would like to support the decision that site Seat_08 has not been allocated as a future development site for housing or employment purposes in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'. The previous 'East Devon Local Plan (Regulation 18) – consultation feedback report – July 2023' (pages 195-6), 'East Devon Local Plan Site Selection Report Seaton' (pages 32-37), and earlier 'Appendix 2: Site Selection – Interim findings at Tier One and Two Settlements' document (2022), as well as the decision of the Strategic Planning Committee at their meeting held on September 11, 2024, all came to the same conclusion in relation to site Seat_08 not being suitable as a future development site. As has already been identified for this site, Seat_08 is a Greenfield site with a rising character on the western boundary of the town. It is a highly exposed site on the skyline which can be seen from multiple viewpoints from the south and east, which includes an Area of Outstanding Natural Beauty (AONB; Strategy Policy OL02). Therefore, any development on this site would have an adverse impact on the topography and undeveloped, natural skyline on the Western boundary of Seaton. In addition, Seat_08 is in the Coastal Preservation Area (Strategy Policy OL03) and also shares a Landscape Character Type 2A in the East Devon Landscape Character Assessment. SEAT_08 also serves as an important fire break between the built up area and adjacent Couchill Coppice. The site also provides a natural habitat for an abundance of different wildlife species (some of which are protected species) and enables their movement to and from the neighbouring Couchill Coppice. Seat_08 is also a well known corridor used by bats, being in the Beer Quarry & Caves Special Area Conservation zone. In summary, I continue to support the decision that site Seat_08 has not been allocated as a future development site for housing or employment, and for that reason, has not been included in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'.

Site: Seat_10

I would like to support the decision that site Seat_10 has not been allocated as a future development site for housing in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'. The previous 'East Devon Local Plan (Regulation 18) – consultation feedback report – July 2023' (page 196), East Devon Local Plan Site Selection Report Seaton' (pages 43-45), and earlier 'Appendix 2: Site Selection – Interim findings at Tier One and Two Settlements' document (2022), as well as the decision of the Strategic Planning Committee at their meeting held on September 11, 2024, all came to the same conclusion in relation to site Seat_10 not being suitable as a future development site. As has already been identified for the site, Seat_10 is a Greenfield site on the western boundary of the town which is sensitively located on a steep slope. Its elevated character means that it can be seen from multiple viewpoints, which includes the South West Coastal Path, the top of Seaton Hole and elevated positions in Beer parish. Therefore, any attempt to build on it would have a negative impact on the natural landscape. The site is also a well known corridor used by bats (for foraging and commuting), being in the Beer Quarry & Caves Special Area Conservation zone, particularly as there is no overspill of light pollution into it because it is on the edge of the built up area. This, therefore, supports findings that site SEAT_10 is an important corridor used by various species of bats. In summary, I continue to support the decision that site Seat_10 has not been allocated as a future development site for housing, and for that reason, has not been included in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'.

Full name: David Morgan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic Policy SD05: Seaton and its development allocations (pages 87-89).

Comment: Re: Sites Seat_03 and Seat_05. I do not support the provision of housing for these sites given they conflict with a number of policies contained within the East Devon Local Plan. These include Policy OL05: Green Wedges (page 203) which states: “Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.” Strategic Policy OL01: Landscape Features (pages 196-197) states: “East Devon’s landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute to the character of East Devon’s landscapes, in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located.” Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty) (pages 199-200) states: “National Landscapes (Areas of Outstanding Natural Beauty) The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NLs) in East Devon: A) Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant). B) Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest.” Strategic Policy PB04: Habitats Regulations Assessment (pages 220-223) states: “Protection of Beer Quarry Cave SAC bat pinch points between Seaton and Colyford, and between Colyford and Colyton. In order to protect the pinch points and secure their long-term suitability for the SAC bat species, the council will not support

any applications which reduce the quality or functionality of the bat foraging and commuting habitats within these pinch points, such as through hedgerow/tree loss and adverse impacts from lighting”. In addition, Transport Policy TR01 (pages 183-184; Paragraph 11.5) refers to “Exmouth, Honiton, Seaton, and Ottery St Mary having bespoke bus services, with several high-frequency routes linking East Devon settlements to Exeter”, as ‘Justification for Policy’. However, the Justification for Policy TR01 fails to recognise there are disparities in this ‘broad brush’ assumption. Towns such as Seaton have no bus services serving the town from Exeter after 7:05PM for six days of the week, (6:05PM on Sundays), whereas Exmouth, Honiton and Ottery St Mary do. Nor is there a bus service from Axminster to Seaton after 6:30PM for six days of the week, (Mondays to Saturdays), and no bus services on Sundays, to provide a link with Axminster’s railway station. There is also no bus service from Honiton to Seaton after 5:50PM for seven days of the week, to provide a link with Honiton and its railway station. Policy TR01 does not take into account there is no early morning bus service from Seaton (before 8am) on Saturdays and Sundays to any destinations, including Axminster, Sidmouth, Honiton and Exeter, all of which are major hubs for employment, medical facilities, leisure and recreational activities. Moreover, Sunday services are also limited from Seaton, with just one bus route (the 9A) operating to provide a connection with Sidmouth and Exeter. Unlike Exmouth, Axminster and Honiton, Seaton does not have a supplementary railway to provide further travelling opportunities on public transport. Therefore, Transport Policy TR01’s ‘broadbrush’ assumption that each town has a comparable level of “high-frequency routes linking East Devon settlements to Exeter” is incorrect and therefore must be disregarded in relation to suggesting it meets the needs of residents living in Seaton and the surrounding parishes. Policy OL10: Development on High Quality Agricultural Land (page 209) looks to, A) “Restrict development on the best and most versatile agricultural land (Grades 1, 2, and 3a) unless there is an overriding need and no suitable lower-grade land is available”. It is clear that the sites Seat_03 and Seat_05 are both high quality and versatile use agricultural land. Therefore, they should not be use for housing allocation. Strategy 23 for Seaton in the emerging East Devon Local Plan, 2020 to 2040, Preferred Options Reg. 18 Consultation Draft Plan (Current draft - autumn 2022), (page 81, Paragraph 6.45) also states: “The population and range of community facilities and services in Seaton make it an appropriate place to locate a relatively large amount of housing and employment development”. However, as already demonstrated through the aforementioned policies, Seaton offers a more restricted level of infrastructure compared to every other Tier 2 towns in East Devon. Therefore, taken alongside the additional constraints of Seaton’s topography and other valued landscape characteristics, this does not justify the number of new housing and employment sites being proposed.

Therefore, I do not support the recommendation in the East Devon Local Plan Regulation 19 Report that Seaton should be considered a Tier 2 town able to deliver 522 new dwellings up to 2040 (Strategy Policy SP03; pages 32-35). Especially when considered in comparison with Sidmouth and the Sid Valley with its greater infrastructure, including more primary and secondary schools provision, more shops, all weather recreational facilities, and with a more active community hospital, is required to deliver 471 new dwellings for the same period. This would suggest that Sidmouth and the Sid Valley is actually far better placed to support an increase in their respective housing allocation beyond 471 new dwellings rather than utilise sites Seat_03 and Seat_05 in Seaton.

Full name: David Morgan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Page 3, Paragraph 2. Quote: “This Local Plan, guiding development in East Devon through to 2042, aims to preserve and enhance these distinctive qualities. While government policy necessitates the allocation of land for housing and employment, our focus remains firmly on ensuring development is balanced, sustainable, and beneficial to our communities. This Plan is underpinned by principles that seek to protect our outstanding landscapes and wildlife while fostering vibrant, inclusive communities.”

Comment: Unfortunately, this latter point cannot be evidenced or supported in relation to protecting the large green wedge site between Seaton and Colyford. As well as being an outstanding landscape, the site supports biodiversity and provides an important foraging site for an abundance of nationally protected wildlife species, such as bats. The site also meets various farming practises in relation to encouraging localised food production, which is more sustainable and also delivers a reduced carbon footprint through reduced transportation requirements compared to sourcing a comparable alternative food source, either nationally or importing it.

Full name: Judith Richards

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Dear Councillor The updated National Planning Policy Framework, paragraph 187, says that ‘Planning policies and decisions should contribute to and enhance the natural and local environment.’ Adopted East Devon Local Plan Strategy 25 states that ‘Seaton has a role as an important Green Tourism destination on the Jurassic Coast’ and this has to include protection of the panoramic views of the Axe Valley Estuary. It also states that ‘Seaton’s outstanding natural environment is its most precious and defining asset and policies for the conservation, enhancement and sensitive management of the landscape, heritage and wildlife of the area will be prominent.’ Strategy 46 – Landscape Conservation and Enhancement - states that ‘development will need to be undertaken in a manner that is sympathetic to, and help conserve and enhance the quality and local distinctiveness of the natural and historic landscape character of East Devon’. There is a consultation in the new Local Plan, at the moment, which asks people their opinion about the East Devon National Landscape Management (formally known as the Area of Outstanding Natural Beauty). EDDC’s vision for 2050 is for ‘ A Wilder Greener Landscape where healthy ecosystems provide multiple benefits to society.’ The special qualities of the landscape are recognised, protected, enhanced and conserved, safeguarding the area’s rich heritage for generations to come. Emerging East Devon Local Plan - Strategic Policy OL01: Landscape Features - East Devon’s landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute to the character of East Devon’s landscapes, and in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located. Strategic Policy OL02: National Landscapes (AONB) - The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL’s) in East Devon. Development in a NL, or outside but affecting its setting or appearance, will only be

permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL. Policy OL04: Areas of Strategic Visual Importance – Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the District, in particular by conserving and enhancing key views. Policy OL05: Green Wedges - Green Wedges are a long standing local landscape designation that recognises the importance of maintaining open green networks between settlements in close proximity, for wildlife, flood storage capacity, leisure and recreation and prevent settlement coalescence in order to maintain a sense of place and identity for local communities. Within green wedges..... development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement or could lead to or encourage settlement coalescence, whether physical and or visual. (The Seaton Built-up Area Boundary has been moved northwards, effectively closing the Green Wedge between Seaton and Colyford, to allow for a development on good quality agricultural land) Strategic Policy PB01: International followed by nationally designated wildlife sites are of great importance and must be given upper most protection. Policy PB02: Protection of regionally and locally important wildlife sites. Policy PB03: Protection of irreplaceable habitats and important features. Development proposals which would result in the destruction or degradation of irreplaceable habitats will be refused.... Strategic Policy PB04: Habitats Regulations Assessment

-Nutrient neutrality in the River Axe. EDDC requires development proposals within the River Axe SAC catchment to demonstrate how nutrient neutrality will be achieved.

-Protection of Beer Quarry Caves SAC bat pinch points between Seaton and Colyford and between Colyford and Colyton. In order to protect the pinch points and secure their long-term suitability for the SAC bat species, the council will not support any applications which reduce the quality or functionality of the bat foraging and commuting habitats within these pinch points, such as through hedgerow/tree loss and adverse impacts from lighting. (A proposed development at Seaton contains a football pitch crossing one of these foraging and commuting habitats which would be adversely affected if there was any chance of flood lighting.) The Emerging Local Plan states that “This plan is underpinned by principles that seek to protect our outstanding landscapes and wildlife, while fostering vibrant, inclusive communities..... We will ensure that alongside new development there is greater care of the natural world with biodiversity improvements.....” The policies I have listed here seem to reinforce these aspirations. However EDDC’s vision for Seaton is significantly different in the emerging Local Plan compared to the adopted Local Plan that is in force at the moment. There is conflict here. There are at least three development sites on Seaton’s Green Wedges which have been put forward for housing!

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe that the emerging Local Plan needs to be amended to ensure that EDDC commits to the continued protection of our landscape, natural environment, wildlife and our Green Wedges. Once these have gone, they have gone for ever. The Local Plan must be deliverable, not just aspirational.

Full name: Hilary Robarts-Arnold

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We are wanting you to remove the areas within Seaton you have earmarked for development. Namely 75 houses in Barnards Hill Lane, 130 dwellings off Harepath Road and 39 dwellings west of Axeview Road. In terms of housing need, a general matrix has been used to come up with Seaton's allocation despite a housing needs assessment not being undertaken and despite Seaton's unique natural environment which needs protecting. There are currently over 120 properties on the market from £49,000 upwards plus those currently under construction at Fosseyway Court and Seaton Quay with many other sites in the pipeline.

Our infrastructure is insufficient for any new developments. Town centre shops are very concerned which is borne out by the statement that Tesco would bring shoppers into the Town centre which has never happened.

There are so many other reasons that the Harepath Road area in particular should not be built on which has been written about endlessly and never taken note of.

Full name: Dr Rick Rylance

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I'm writing to you direct as I find the formal website unnecessarily restrictive, complicated and difficult to manage, as do several other potential respondents. You should consider this in any future iterations. Convenience of processing at your end is not a good reason to over-control responses. I am concerned about the impact of proposed housing developments on Seaton, where I live, and its immediate natural environment which I treasure and use extensively.

- I note no housing needs assessment has been undertaken in Seaton and that the current plan appears to be driven by formula rather than evidence of need or impact. I note there are currently a considerable number of properties for sale locally and that there are extensive building projects underway.
- I am concerned that no thorough survey had been done of the availability of brown field or repurposed sites which might be used for additional residential accommodation rather than green field developments.
- I am concerned about the impact on local services of sharp increases in local population including in the provision of health care, transport, and education.
- I am concerned about the impact on traffic flows has not been sufficiently assessed in the context of increasing congestion on narrow country lanes especially in the summer with heavy use of large tourist vehicles.
- I am concerned about the impact on what is already a rather run-down town centre of developing out-of-town retail units.
- Most importantly, I am concerned about the impact on the local natural environment which is the single most important aspect of living in rural Devon and which will be damaged by steadily increasing housing. No sensible person would believe that any development suggested here will be the last. Others will follow as they

always do when precedent is set. If these developments go ahead, developers' interests will prevail over those of residents, and their profits and convenience over quality of life and environment. Finally, it is worth saying that the current proposals conflict with, or potentially conflict with, existing policies on, for example, Green Wedges, Landscape, housing, communities, town centres, and flood planning, as well as statement on the importance of the natural environment and its benefits for the community and individual health and quality of life. This is strategically incoherent.

Full name: Heather Sanham

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The emerging Local Plan states that it aims to preserve and enhance the distinctive qualities of East Devon's glorious thriving natural environment; that it is underpinned by principles that seek to protect our outstanding landscapes and wildlife...that it will ensure that there is greater care of the natural world with biodiversity improvements, etc; and that EDDC will work with partner bodies to secure new expanded and improved physical, social and community facilities and infrastructure delivered alongside development.

But for Seaton, the emerging Plan is proposing new development sites on the town's Green Wedges which not only ensure that the principles of the Plan in respect of the natural environment cannot be delivered in Seaton, they are also directly in conflict with the following policies:

- Policy OL05: Green wedges Within green wedges..... development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.
- Strategic Policy OL01: Landscape features East Devon's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate

Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute to the character of East Devon's landscapes, in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located.

- Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty) The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon: Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant). Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest;
- Strategic Policy PB01: International followed by nationally designated wildlife sites are of greatest importance and must be given upper most protection.
- Policy PB02: Protection of regionally and locally important wildlife sites
- Policy PB03: Protection of irreplaceable habitats and important features Development proposals which would result in the destruction or degradation of irreplaceable habitats will be refused unless
- Strategic Policy PB04: Habitats Regulations Assessment
 - Nutrient neutrality in the River Axe SAC catchment. East Devon District Council requires development proposals within the River Axe SAC catchment to demonstrate how nutrient neutrality will be achieved.

- Protection of Beer Quarry Cave SAC bat pinch points between Seaton and Colyford, and between Colyford and Colyton. In order to protect the pinch points and secure their long-term suitability for the SAC bat species, the council will not support any applications which reduce the quality or functionality of the bat foraging and commuting habitats within these pinch points, such as through hedgerow\tree loss and adverse impacts from lighting.

Therefore for all the above reasons, I believe that proposed sites Seat_02, Seat_03, Seat_05 and Seat_09 should be removed from the emerging Plan

Further policies within the emerging Plan which are inaccurate are :

- Transport TR01 Exmouth, Honiton, Seaton, and Ottery St Mary have bespoke bus services, with several high-frequency routes linking East Devon settlements to Exeter. Seaton's bus services have declined considerably over the last few years making it difficult - and in some cases impossible - to travel to other towns for work.
- Policy OL10: Development on high quality agricultural land This policy restricts development on the best and most versatile agricultural land (Grades 1, 2, and 3a) unless there is an overriding need and no suitable lower-grade land is available.

EDDC's commitment to Seaton in the emerging Plan is much reduced compared to its commitment in the current adopted Plan which seeks to support the town's economy, building its reputation as a destination for green tourism:

1) HOUSING

- Strategy 25 - The adopted Plan (2013 – 2031) stated that any further significant housing developments beyond the build-up area boundary would be restricted by locating the majority of the required 150 within the existing town. But the emerging Plan not only states that “The population and range of community facilities and services in Seaton make it an appropriate place to locate a relatively large amount of housing and employment development” it now proposes significant housing in the Green Wedge.

In the time since the current Plan was adopted and now, Seaton has delivered more houses than allocated whilst its infrastructure and facilities have reduced.

Therefore the proposal to allocate further land for housing is unsustainable, and to do so in the town's Green Wedges is against EDDC's own vision and policies relating to protection of the natural environment.

I therefore do not support the inclusion of sites Seat_02, Seat_03, Seat_05 or Seat_09 in the emerging Plan for future development.

2) COMMUNITY FACILITIES

- The adopted Plan in 2013, stated: “community facilities, school, health, social and cultural, are seen as borderline or inadequate with no capacity to serve additional residents”.
- Despite those facilities having reduced further since 2013, in 2025 the emerging Plan now states that “Seaton has a wide range of community facilities, with a variety of shops, sports facilities, a library, GP, hospital, and regular bus service around the settlement and to areas elsewhere”.

The emerging Plan statement that Seaton has a wide range of community facilities is incorrect. The town cannot support an increase in population; doctors and dentists are at capacity; the hospital has lost facilities; bus services have been reduced; community facilities at Colyford Road have been demolished. The inclusion of Seat_02, Seat_03, Seat_05 and Seat_09 for future development is therefore unsustainable.

3) TOWN CENTRE

The adopted Plan stated in 2013 that “priority will be given to the enhancement of the environment and the promotion of business opportunities within the Town Centre to improve the attraction of the town for residents, visitors and businesses.”

This statement has been removed from the emerging Plan but needs to be restored to meet the emerging Plan's commitment to "preserve and enhance the distinctive qualities of East Devon's glorious thriving natural environment", and to "promote business opportunities within the Town Centre to improve the attraction of the for residents, visitors and businesses", all of which are essential to secure the town's future economy.

4) NATURAL ENVIRONMENT

- The adopted Plan states “Seaton's outstanding natural environment especially its Wetlands is its most precious and defining asset, and policies for the conservation, enhancement and sensitive management of the landscape, heritage and wildlife of the area will be prominent. The Axe Wetlands, Dorset and East Devon Coast World Heritage Site (Jurassic Coast) and surrounding exceptional coastline will be key environmental assets that will be integral to the future success of the town.”
- The emerging Plan no longer commits to policies for the conservation, enhancement and sensitive management of the landscape for Seaton and simply states: “Seaton is set within a stunning natural environment with the coast to the south (including the Jurassic Coast World Heritage Site), Seaton Wetlands along the eastern boundary, and the East Devon AONB located beyond to the east. Two scheduled monuments in close proximity indicate the high historic value in the area, along with a conservation area and several listed buildings in and around the town centre.”

Again, despite the statement that the emerging Plan will "preserve and enhance the distinctive qualities of East Devon's glorious thriving natural environment", in respect of Seaton EDDC's previous commitment to protect, conserve and enhance the town's unique natural environment has been removed in the emerging Plan. This should be

reinstated. In order to deliver on the Plan's commitment to preserve and enhance the distinctive qualities of East Devon's glorious thriving natural environment... its principles that seek to protect our outstanding landscapes and wildlife...ensure that there is greater care of the natural world with biodiversity improvements, etc, I believe that the following amendments need to be made:

- In respect of the Seaton/Colyford Green Wedge, the land which has been designated for employment/recreational use but has remained undeveloped for over 25 years should have the designation removed. All land north and east of the Harepath Road industrial site which is earmarked for employment or housing in the emerging Plan should be re-designated Green Wedge.
- The Seaton/Beer Green Wedge should be extended to include the land between the built up area boundary and parish boundary to preserve Seaton's distinctive topography.

Only then can the town's unique natural environment be protected, conserved and enhanced; can flooding of the surrounding housing and Wetlands in which EDDC have made considerable investment be averted; can the town's future economy based on Natural Seaton be supported; and the town's infrastructure be sustainable and meet the needs of its current population.

5) FUTURE DEVELOPMENT

- The adopted Plan states: The Future: We will Restrict any further significant housing developments beyond the existing Built-up Area boundary Ensure that the integrity of the European wildlife and habitats sites adjoining and near the town are not compromised..... Extending the network of green links within the settlement and to surrounding countryside and settlements

Seaton will be supported in its role as an important visitor destination on the East Devon Coast, with the onus placed on conservation and enhancement of the surrounding natural environment. There will be limited housing development in the short term beyond that already proposed in the regeneration area. Note - housing in the

regeneration area is still to be completed along with development at Fosseway Court and the Hook & Parrot on the town's seafront.

- In contrast the emerging Local Plan states: The population and range of community facilities and services in Seaton make it an appropriate place to locate a relatively large amount of housing and employment development. But then goes on to say: The amount of development should be limited to an extent, as new residents will need to travel elsewhere to access some strategic facilities which are lacking in Seaton (train station, secondary school, swimming pool).....The environmental constraints around Seaton also limit its growth, with the River Axe and associated flood zone to the east, AONB also to the east, a rising landscape to the west, and sea to south, all limiting the realistic options for future development.

So whilst first stating in the emerging Plan that Seaton is an appropriate place to locate a relatively large amount of housing and employment development, it goes on to acknowledge that development should be limited with environmental constraints also limiting the town's growth. As previously stated, infrastructure has decreased since the adopted Local Plan; housing has exceeded that required in the adopted Plan with more still to be completed; and any additional housing will compromise the integrity of wildlife and habitat sites and is likely to lead to flooding of surrounding housing and the Wetlands. Therefore proposed development sites Seat_02, Seat_03, Seat_05 and Seat_09 should be removed from the emerging Plan.,

6) FLOODING

Seaton has increasingly experienced flooding east of Harepath Road and at Seaton Wetlands Nature Reserve. Any development on the Green Wedge would inevitably result in further flooding of the Reserve and would put its future as a significant tourist attraction at considerable risk.

Additional flooding risk comes from Stafford Brook which no longer follows its natural, low-lying route through its flood plain to the main river, and in places the water level in the Brook is now above the ground level of its flood plain at Stafford Marsh.

Any increase to the flow of water into the Brook, no matter how small, increases the risk of flooding at Seaton Wetlands, and will therefore impact on visitors to this National Nature Reserve and to users of the Stop Line Way (National Cycle Route 33) that passes through it.

This is further reason why the Green Wedges should be protected from development and extended to prevent flooding of the Wetlands. Because of the risk of surface water flooding, it has become critical that Seat_02, Seat_03, Seat_05 and Seat_09 as well as the newly proposed Seat_13a to the west of Axe View Road, are also included within the Green wedges and that the emerging Plan is amended to ensure future protection of this important site.

7) SOCIAL HOUSING

An area that could be used to provide housing for the town is the site at Seat_06 Former Depot, Colyford Road, Seaton, EX12 2DQ which is close to all amenities and within the town's built up area boundary. It was made derelict in 2013 with the intention of delivering work units. Loss of employment space is given as the reason for not allocating this land for housing but the case has never been made for more work units in Seaton with those at Riverside Workshops largely used for storage.

The emerging Local Plan states that a section of Seaton Marshes Local Nature Reserve is within the northern boundary of site Seat_06 but that is incorrect and this statement needs amending. To give it protection from development claiming that it is part of the Nature Reserve is false.

In short, the proposals in the emerging Plan are significant in respect of the town's Green Wedges and, if the Plan is approved, are likely to lead to uncontrolled building which will no longer provide protection, enhancement and conservation of Seaton's unique natural environment and will threaten the town's future economy based on Natural Seaton. It will lead to flooding of surrounding homes and of the Wetlands; to loss of biodiversity and rare wildlife; loss of prime agricultural land; would result in

coalescence of the settlements of Seaton and Colyford; and would change the character of this area from open rural to virtually continuous urbanised. As the Planning Inspector stated in upholding refusal of development at Harepath Road when it last came forward for development, “the housing shortfall although significant is - arguably - relatively short term, whereas the erosion of separation between Colyford and Seaton would be permanent”.

The proposals in the emerging Plan are unsustainable. Seaton's doctors, dentists and hospital facilities which have been much reduced over the last few years, are already struggling. They also serve the residents of surrounding towns and villages where further additional homes are being proposed. A development of over 70 new homes at Colyton is currently being built with another large site planned. Our infrastructure is insufficient for any new developments, in Seaton or outside.

To preserve Seaton's way of life and future, and to deliver on the emerging Plan's vision, now is the time for the site Seat_05 (Harepath Road), which for over 25 years has been allocated for mixed use employment/recreation, to be removed from the emerging Plan altogether and returned to Green Wedge so that the town can build on all the work that has been put in during that time into developing Seaton as a destination for green tourism. This land has remained undeveloped for years because without housing to support it, it is not viable. Removal of this site would also ensure that any future retail/employment is based close to the town centre to support the town centre and therefore meet Strategy SE06 which says: Tier two towns (Seaton) form focal points of activity in East Devon towns and will be the preferred location for the development of new retail, leisure and other uses that attract and are used by people for commercial or community activities....."Development proposals that would result in the loss of existing local shops and services will be resisted where it would result in the significant or absolute loss of that facility to the community." Town centre shops have almost unanimously expressed their concern at the prospect of out of town shopping facilities at Harepath Road and many believe their businesses won't survive if such development were to go ahead. This is borne out by the statement to them that Tesco would bring shoppers to the town centre, but that never happened - people shop at the store and go home. It's also borne out by significant evidence from SavetheHighStreet.org as well as acknowledged by the developer currently proposing retail warehouses at Harepath Road, that their development would have an adverse affect on Seaton town centre shops.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

So, as evidenced above, unless sites Seat_02, Seat_03, Seat_05 and Seat_09 are removed from the emerging Local Plan then EDDC's vision for and commitment to East Devon remains only aspirational for Seaton and can never be delivered for the town.

Full name: Martin Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Housing on sites 03 and 05 will contradict other policies of the plan. TR01 specifies wheeling cycling cycling and public transport as ‘first choice’ but wheeling and walking will not realistically be viable choice for most residents due to distance from centre. TR01 also specifies ‘high quality public transport’ but this will not be available. SP01 specifies development to match local needs but development on this site will inevitably be mainly larger detacheds which will attract incomers. HN01 specifies priority for affordable housing and young people but development on this site will inevitably be mainly non-affordable and attract older people. Seaton already has a large shortage of social housing and a huge population imbalance (almost 45% 65+) so any development should specify social housing only. OL01 protects important local landscapes and the council’s Landscape Architect as well as an Inspector have previously emphasised the detrimental effects of development on this site. Policies emphasise protecting landscape which is relevant to tourist attractions and the proximity of this site to the Wetlands should exclude it. Policies also emphasise prevention of settlement coalescence (Green Wedge) and the inclusion of this site will contribution to that. Altogether the inclusion of this site makes the plan as a whole incoherent as well as having detrimental effects on the local environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To make the local plan coherent, these sites should be deleted from the policy. The policy should also

include new paragraphs addressing Seaton's population imbalance and the specific need for social housing, in more central locations. Seaton does not need any more developments of larger detached houses (there have been several large developments of this kind in recent years) until this is addressed.

Full name: A.R. Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I believe there are many reasons why the emerging local plan sites Seat_02, Seat_03 and Seat_05 should be deleted as candidate development sites. I therefore set out reasons why Seaton is totally unsuitable for consideration for any further housing development. The proposal to include three new development sites on the town's Green Wedges conflict with the following policies:

Strategic Policy OL01: Landscape features: East Devon's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute to the character of East Devon's landscapes, in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located.

Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty): The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon: Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant). Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest.

Strategy 46 of the currently adopted local plan gives general protection for landscapes of value. We are surrounded by the East Devon AONB which forms the setting for sites Seat_03 and Seat_05.

Policy OL05: Green wedges Within green wedges..... development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.

Paragraphs 142 to 144 of the National Planning Policy Framework (NPPF) address the protection of Green Belt Land, and Green Wedges have been interpreted to be included under this definition. Green Belt/Wedges are defined as serving the following purposes:

a) To check unrestricted sprawl of large built-up areas. b) To prevent neighbouring towns from merging into one another. c) To assist in safeguarding the countryside from encroachment. d) To preserve the setting and special character of historic towns, and. e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Of these at least a), b), and d) are applicable to Seat_05 because it is a buffer between Seaton and the Ancient Borough of Colyford.

The adopted plan in 2013 stated : ‘community facilities, school, health, social and cultural are seen as borderline or inadequate with no capacity to serve additional residents’.

The 2025 the emerging plan now states that ‘Seaton has a wide range of community facilities, with a variety of shops, sports facilities, a library, GP, Hospital, and regular bus services around the settlement’.

With reference to the adopted plan quotation, the emerging plan statement is clearly untrue and needs amending. These facilities have reduced considerably since 2013, e.g. closure of hospital in-patient beds.

There is also a threat to Seaton Wetlands. This is a very precious asset to Seaton where numbers of visitors have increased exponentially since it opened, and must be preserved at all costs. These sites all fall within the corridor for bat migration and foraging between the Beer Quarry caves and Seaton Wetlands and development will compromise their continued occupation of the Seaton area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe the key to protecting Seaton from unsustainable and inappropriate development which will threaten so much of Seaton's way of life and future is to remove sites Seat_02, Seat_03 and Seat_05 from the emerging Local Plan.

I believe that the site at Harepath Road that has been allocated for mixed use Industrial/recreation should also be removed from the emerging plan and returned to the Green Wedge so that the town can build on all the work that has been put in during that time into developing Seaton as a 'destination for Green Tourism'. Removal of this site would also ensure that any future retail/employment is based closer to the town centre to support it and therefore meet strategy SE06.

I therefore request that the above mentioned sites be removed as potential development sites from the emerging Local Plan and return to Green Wedge status and that the Built-up Boundary be restored to that in the adopted 2013 plan.

Full name: Diane Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are many reasons why the emerging local plan sites Seat_02, Seat_03 and Seat_05 should be deleted as candidate development sites. I therefore set out reasons why Seaton is totally unsuitable for consideration for any further housing development. I would like to start with infrastructure. Vitally important is the insufficient, infrastructure to support development of these sites. We have an old sewage system that would come under severe pressure. Local schools are full which begs the question of how far children would have to travel to fulfil their education. I discussed the potential for development of these sites with a local Medical Practice recently who have confirmed that, I quote - 'the Practice could not manage with present resources' should further housing development go ahead. Taking into account developments presently under construction at the Waterfront (30 properties), Seaton Quay (90 properties) and 72 houses under construction in Colyton, the GP Service position will be further exacerbated and will cause further disruption to an already stretched health service. We all know from recent news that Dental Services throughout the West of England are in crisis such that very few people are able to access NHS Dental care. There are few places left for the air ambulance to land and it is well to note this area is used as a landing area in an emergency, and has been used twice in the last few weeks. The adopted plan in 2013 stated : 'community facilities, school, health, social and cultural are seen as borderline or inadequate with no capacity to serve additional residents'. Despite these facilities having reduced considerably since 2013, in 2025 the emerging plan now states that 'Seaton has a wide range of community facilities, with a variety of shops, sports facilities, a library, GP, Hospital, and regular bus services around the settlement'. With reference to the first quotation of this paragraph this second statement is clearly untrue and needs amending. I emailed Richard Foord about my deep concerns regarding this development – I quote his reply of 15/8/24 'Your email raises very important points specific to that site, but also about development in general. Broadly speaking, I am in favour of more homes – as they are so desperately needed -

but at the correct price point and on appropriate sites. Building for profit, with no real appreciation or action regarding infrastructure is clearly wrong. Flooding is a factor that must always be given serious consideration now'. End quote There is also a threat to Seaton Wetlands. This is a very precious asset to Seaton where numbers of visitors have increased exponentially since it opened, and must be preserved at all costs. The disruption caused both during and after development would have an enormous impact on the wildlife at this very important site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

I believe the key to protecting Seaton from unsustainable and inappropriate development which will threaten so much of Seaton's way of life and future is to remove sites Seat_02, Seat_03 and Seat_05 from the emerging Local Plan. I believe that the site at Harepath Road that has been allocated for mixed use Industrial/recreation should also be removed from the emerging plan and returned to the Green Wedge so that the town can build on all the work that has been put in during that time into developing Seaton as a 'destination for Green Tourism'. Removal of this site would also ensure that any future retail/employment is based closer to the town centre to support it and therefore meet strategy SE06. I therefore request that the above mentioned sites be removed as potential development sites from the emerging Local Plan and return to Green Wedge status.

Full name: John Vieth

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I object strongly to further development to the North of Seaton, reducing the green wedge to Colyford.

A few years ago, similar proposals on this land were rejected after a great deal of investigation, review and cost. During these financially challenging times we cannot afford to 'go round the houses' again. It is a worthless exercise, the majority of the public don't want it and the area does not need it. It's a waste of money that we don't have.

This important green space forms a division between Seaton and Colyford. It provides a safe corridor for birds, bats and badgers. I have seen hares, deer, curlews, lapwings, egrets, foxes, rabbits, geese and pheasants on these fields. This important wildlife will disappear forever if these houses are built.

Please don't believe that there is a housing shortage in Seaton. This morning, on Rightmove, there are 248 properties for sale in Seaton. The prices range from £70k to £1m; the full spectrum.

Colyford cannot cope with any increase in traffic that this development will inevitably bring. Come and stand on Swan Hill (A3052), or at the junction with Harepath Road or Seaton Road by Colyford Post Office when 1100 pupils arrive at or depart the grammar school. You will witness the road being practically closed as they get on and off up to 15 buses twice a day. It's an accident waiting to happen.

Please do allow further development in this area, it is important for future generations and wildlife.

Full name: Rob Wallbank

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I've made some representations on this plan, but wish to add some pertinent points. These are comparing the existing site designation for land associated with Seaton 02 and 03 and refer to previous plans compiled by EDC

Then noting the current proposed plan regulation 19, the two proposals and statements are polarised. The first document states that great emphasis is placed on existing agriculture and farming in rural areas and the retention of green spaces and green wedges. Yet the regulation 19 has redesignated farming land and green wedges bring both into the proposed plan.

Security of land and land use as well as preservation of these special and rare spaces it crucial, in your own words, yet dismissed out of hand without discussion to anyone affected by these proposed changes and the considerable loss of amenity of these precious spaces.

Land designation is there to provide security to local populations knowing that it won't be built upon and wildlife, public view points etc are continued to be preserved for reasons set out historically and have remained so for many years.

I mention view points. The first document has two such points at the top of Barnards Hill Lane. One points east, which looks over the Axe valley to hills beyond, but view also looks south-east to the sea. This view point would look over Seat 02 and Seat 03 in the proposed plan, thus the statements to preserve these specific amenities, will be lost if

Seat 02 & 03 are built upon, robbing walkers and locals of a prime position above Seaton.

I urge EDC to seriously consider Seat 02 as not appropriate as it rejects all the previous land designation, rejects the positive needs of preserving view and vantage points, as well as rejecting the positive statements of preserving valuable farming land. I also draw on the other points I have made regarding loss of essential wildlife corridors, and increasing flooding to existing housing. This site should not be available for development.

Seat 03 is in conflict with much of the above so also should not be available to development.

I hope these observations are helpful in understanding my concerns and the proposed changes in land use that would permanently remove significant amenity benefits.

Full name: Rob Wallbank

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Seat

02 is proposed for 40 dwellings, with a wide buffer to the north and west. It is difficult to assess the density for his proposal as those properties in Mulberry Rise, Oakland close and Poplar Tree Drive (typo on the document corrected here), 40 houses would take up much of the site, and leave no wide buffer. The proposed size of this buffer is not specified in the document and therefore difficult to assess, but the available space and assuming similar density of building, would sensibly allow around 20 properties. The bat corridor is crucial and I predict a complete loss of this amenity if any houses are built on the site, let alone 20, but certainly not 40. This is an over optimistic number and will lead to over development of the site and a complete loss of the essential wildlife migration routes. By stating housing number in this policy, is dangerous, so since the corridor and buffer zones are vital, this allocated space must be set out clearly to avoid misunderstanding (at best), or high levels of abjections later when it becomes clear that the housing number takes priority over an interpretation of “buffer zones”. Access to Seat 02 is awkward unless the spur off Lime way is used. Otherwise Barnards Hill Lane will be a busy junction at the bottom and encourage more cars to use the lane to exit onto the A3052, much as they do now which is extremely dangerous and illegal. Such a proposal represents a significant loss to the area. Barnards Hill Lane is used by many local walkers as it provides a safe access to Holyford as well as a rare view over the to the Axe estuary and sea. If building work is granted, then it would need to be at maximum only the bottom half of the site only, to provide adequate bat migration, but also a sensible and appropriate gap between Seaton and the country side. The impact on the current flooding of this site would then be reduced allowing surface water to be diverted to Poplar Tree Drive and not towards Lime Way as it currently does. Single storey housing would be in keeping with the surrounding area and be more of desirable need to locals. It would reduce the visual impact of the development in its location. Developing this site (Seat 02), should be last resort bearing in mind the environmental impact in my view, and the suggestion of stating a buUer and reducing the available

building land to the southern half of the field, is a compromise providing environment issues can be overcome. Seat 03 is also affected by the bat corridor and I suspect both Seat 02 and 03 to come under very strong opposition from ecology reports. I object to any development on Seat 02, but if some have to be built, then this must be limited to the lower half of the field only to preserve wildlife corridors, essential agriculture, a demarcation between Seaton and the countryside, preserve a valuable viewpoint for many folk who walk up Barnards Hill Lane, and mitigate flooding into the properties below this site. It would be preferable to look elsewhere for building on existing brownfield sites first before losing this amenity for good. Seat 13a is a very sensitive site, and the Proposal states “Archaeological assessment through geophysical survey and field evaluation should be undertaken prior to the site being developed”. It should read “Archaeological assessment through geophysical survey and field evaluation should be undertaken to assess if a development is safe and practical without causing damage to Roman remains, prior to any progress with considering this site”. This is an area which has much historical amenity value, and would be lost if built over too near to it. I object strongly to the site being considered when other brownfield sites exist.

Full name: Rob Wallbank

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The purpose of this note concentrates on the local planning suggestions for Seaton and Colyford area, where the land identified as Seat 02, Seat 03 and Seat 13a have ignored the historic land designation set aside to differentiate Seaton from Colyford removing previous Green wedge designation, and serious impact to wildlife. I therefore object to the developments specifically Seat 02 and 13a but also Seat 03 for the obvious linking of Seaton to Colyford. The Regulation 19 plan sets out to provide statistics regarding the East Devon area, encompassing the entire district, but does not allocate statistics to individual areas; Seaton's demographic age group is much higher than the 30% quoted, and average earnings are therefore much less than the national average. Housing are mainly bungalows which represent a higher proportion of the housing type, mainly because of the age of the population, and as a consequence, employment in Seaton is much lower than the average, and thus distorts the overall statistics than needs to be considered in additional housing; Jobs attract people. No jobs means housing is not needed, or it simply promotes more commuter traffic to those parts where employment exists, clogging up roads increasing pollution. The statistics have placed value upon Historic Environments and Outstanding Natural Environments, which I welcome. Seaton is on the Jurassic Coast with very long links to the Roman times. There are many protected species, such as bats and bird migration to the Wetlands area, which makes the local plan for Seaton and that of Regulation 19 not only curious, but contrary to the proposed plans and ideals set out in the introduction. The proposal is to adopt this document and then local planning and developers to test conformity, but since this plan removes much of the objectives it sets out to preserve, and ignores key factors in planning (wildlife lost, currently used agricultural land, historic green spaces that separate housing areas, land known to excessive flooding, loss of agricultural land to name but some of the objections), then by allowing development to be adopted simply isn't good practice, and in fact is dangerous to local communities, wildlife, road and sewage treatment infrastructure, schooling, doctors, hospitals etc etc. Developers

should not be the people to test the policy and constraints of the land, it must be done at this strategic planning stage. I know that no one has undertaken flood risk assessments of Seat 02 and Seat 03; there have been no consultations with bat conservation, there have been no design checks on existing foul sewage disposal; the list could go on, but to set aside land is a failure to understand the land use and the local needs and constraints. There is already a sewage treatment plant in Seaton that cannot cope with the needs discharging waste into the sea, thus allowing a policy at this planning stage to building more homes will directly impact the coastal environment and is therefore negligent in this proposals. Blame will be pointed at South West Water, but in fact adopting a plan to allow building will be the cause, and this is East Devon's responsibility. At present there are a great number of vacant properties in Seaton. There are few local jobs and therefore to build will damage the environment, place excessive burdens on infrastructure. There are many properties that have been bought up as second homes, which damages the community, and the area, as it does not set out to achieve any of the perceived housing needs for locals.

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: DEVELOPMENT IN THE TOWNS AND VILLAGES The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution. Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
See response to Q2(b)

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See response to Q2(b)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I have no idea and am therefore neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ian Priestley

Organisation (where relevant): Colyford Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Sadly I write this having witnessed EDDC's planning committees February 2025 meeting. It leaves me thinking that this consultation is an enormous waste of time and tax payers money. It appears to be a box ticking exercise. Unfortunately the planning committee came across as either incompetent or corrupt or a mixture of both. The area SEAT-05 was being considered for planning when it hadn't even reached this consultation process. The committee did not know the site and the officers advised against a site visit and steered the Chair to change his vote to one in favour of development. Honestly with officers like this running EDDC what chance is there of any of the consultations sent in actually being read or taken notice of?

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: 1; SEAT 05 This is on the green wedge separating the newly formed Colyford village parish from Seaton town. It is there for a reason, to stop coalescence. There is already a development proposal (comment above) on the land being consulted on. This means you already have the few arguments for and the many arguments against, including this land in this local plan. Interestingly one of the strongest objections comes from within EDDC, as well as Colyford PC and Seaton town council. The area is of huge environmental importance and the EDDC wetlands countryside team know what damage to wildlife will occur when habitat and bat flight routes are destroyed. Tax payers money, spent by EDDC making the area a magnet for green tourism, will be wasted.

Colyford Burgesses own Colyford common below SEAT05 and we do not want to be flooded or see Stafford brook polluted. There is no guarantee the SUDS will work especially if 2 weather events closely follow each other. Seaton road is not fit to see an increase in traffic and the Seaton road /A3052 junction certainly isn't.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Seat_03 and Seat_05: Consistent with the recommendations of the Site selection report, should pre-commencement archaeological survey be required at this site?

Seat_13a: The site is north of, and immediately adjacent to, a sizeable Scheduled Monument: Roman and earlier settlement at Honeyditches – a heritage asset of the highest significance according to the NPPF. The list entry states that the monument survives as below ground remains and slight earthworks which have been recorded by way of excavation and ground survey. Romano-British villas were extensive rural estates and consideration should therefore be given to the potential for associated archaeology to exist within the surrounding areas. Conservation of the remaining rural setting should also be a priority. The proposed site allocation has the potential to result in considerable harm to the significance of this heritage asset. It would break the clearly defined urban edge of Seaton, projecting out into land adjacent to the Scheduled Monument and impacting on views of the wider landscape. While we recognise that some land to the north contains caravans at present, these have an ephemeral quality in the view and are low rise, such that the landscape beyond remains readily visible. Furthermore, the presence of development that harms the setting does not justify further cumulative harm. As information on the archaeological potential of the land has not been provided in support of the site allocation, it is unclear whether a proposed capacity of 39 dwellings would be achievable. This site allocation is therefore unsound as it is not justified (based on proportionate evidence relating to archaeology and setting impacts), it is inconsistent with national policy, and it is not effective as there are questions around deliverability.

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.: Seat_03 and Seat_05: Consider introducing requirement for pre-commencement archaeological survey.

Seat_13a: We recommend that this site allocation is removed from the Plan. Otherwise, as this site may contain significant archaeology, a desk-based assessment and potentially a site evaluation would be needed to justify a site allocation. Please refer to the Plan-making section of our guidance on Planning and Archaeology, in particular from p24. A more detailed understanding is also needed of potential impacts on the settings of heritage assets, and whether this could be minimised and mitigated.

Full name: Neil Butler

Organisation (where relevant): Natural England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic Policy SD05 Seaton (87) Seat_02 / Seat_03 / Seat_05 Policy PB04 on the Beer Quarry and Caves SAC requires that adverse effect on all pinch points is avoided. The site selection reports for the above sites state, however, that they are within pinch points and that a significant adverse impact is likely. The HRA rules out an adverse effect on integrity. Beer Quarry and Caves SAC Guidance says this: “Pinch point has been identified in the landscape between Seaton and Colyford and Colyford and Colyton. Further urban growth in this area could significantly impact on the movement of LHBs and potentially have a likely significant effect on the SAC population. Dark flight lines need to be maintained through these Pinch Points to ensure uninhibited movement into their LCZ and between other key roosts in the region. GHBs that have been ringed at BQ& C have been found at a roost at Charmouth (Vincent Wildlife Trust Pers Comms 2011)” beer-quarry-and-caves-sac-hra-guidance.pdf. In view of this, the HRA is far from clear how the principle of major development within the Seaton / Colyford pinch point will avoid a significant adverse impact on a European protected species. Mitigation wording in the policy is of course useful, but not sufficient if the fundamental principle of development in a pinch point would have an adverse impact. The HRA should therefore revisit this issue and provide an assessment of how the sites interact with the pinch points. Seaton 13a Land west of Axeview Road Site 13a is within the bat sustenance zone for Beer Quarry and Caves SAC. In line with all other sites in the Local Plan in this area the policy should also contain text which requires a wide buffer to the western boundary with tree planting /landscaping boundary and the standard wording used through the plan ‘In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.’

SD06

Full name: Philip Wragg

Organisation (where relevant): Sid Vale Association

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: We disagree with proposed housing development allocations as follows -

Land west of Two Bridges Road, Sidmouth, (Side_06a) - We object to this site because -
(i) This is outside the built up boundary of Sidford (ii) Implies a loss of National Landscape (former AONB), (iii) Will cause an increased risk of flooding on the A375 by the 'Two Bridges' which already floods and can be blocked by run off from the fields above and to the west in heavy rain. (iv) Encroaches into the 'green wedge' between Sidford and Sidbury so will cause coalescence of the built up areas contrary to Policy 3 of the Sid Valley's Neighbourhood Plan 2018 - 2032.

Sidford – land by Windsor Mead and Burnscombe Lane (Side_31) - We object to this housing development site -

(i) This is outside the built up boundary of Sidford, (ii) Implies a loss of National Landscape (former AONB), (iii) Over development of site and poor access (iv) this is a late 2024 addition to the proposed development site in the Sid Valley which was previously listed as 'rejected' in the original version of the proposed Local Plan.

Furzehill, Sidbury (Side_34) - We object as - (i) Implies a loss of National Landscape (former AONB), (ii) Originally presented as sites 34a and 34b with preference just for

development of the lower and smaller site 34a leaving 34b untouched. (iii) Risk of flooding from rainwater run off on to the A375 as identified by the Environment Agency. (iv) this expanded site is a late 2024 addition to the proposed development site in the Sid Valley which was previously listed as the smaller site 34a in the original version of the proposed Local Plan with 34b rejected.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The proposed new housing development sites - Sidm_06a, Sidm_31 and Sidm_34 should be deleted from the proposed Local Plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This part is not sound as the proposed housing development sites have lacked - (1) adequate and effective public consultation. (2) housing development is proposed outside the settlement boundary in 'National landscape' (former AONB), (3) will cause an increased risk of flooding, and, (4) increase the risk of settlement coalescence between Sidford and Sidbury.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The proposed new housing development sites - Sidm_06a, Sidm_31 and Sidm_34 should be deleted from the proposed Local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There has been inadequate public consultation with new 'previously rejected' sites being reintroduced to the Local Plan with no public consultation or approval.

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 verbally represent the views of the Sid Vale Association - the almost 180 year old amenity society for the Sid valley with approaching 2,000 members.

Full name: Alistair Macdonald

Organisation (where relevant): Blue Fox Planning Ltd

Other party name (if relevant): Persimmon Homes South West

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Whilst supporting the Plan in its proposed allocation of Land south-west of Woolbrook Road (Sidm_01), for the reasons set out at 4 (b), we believe that its effectiveness and therefore its soundness could be improved.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

South-West of Woolbrook Road", Sidmouth (Sidm_01).

Persimmon fully supports the intention to allocate this land for residential use and we can confirm that the site is available, for development. In addition, Persimmon has instructed a project team in order to bring the site forward for development as envisaged by the emerging Local Plan. This project team includes the following specialisms:

- Design/Master Planning
- Highways/Accessibility
- Drainage/Flood Risk Assessment

- Ecology
- Landscape and Visual Impact.

The work undertaken by Persimmon has further confirmed that the site is appropriate, achievable and deliverable for development and will deliver much needed new homes, including affordable. In addition, the site will also assist in delivering significant benefits and localised improvements for the wider area including in respect of enhancing sustainable travel modes and surface water flooding.

Notwithstanding Persimmon's support for the principle of allocating the site for development, we are concerned at the wording of Strategic Policy SD06 in that it states "This land is allocated for development of 127 new homes...".

We consider that this wording is both too definitive and inflexible in identifying specifically exactly "127 new homes" and, further, that it is likely to underestimate the true capacity of the site in terms of dwelling numbers.

It is important that planning policies, in allocating land for development, incorporate a degree of flexibility in prescribing the amount of development anticipated to come forward on a specific site if they are to be considered effective and positively prepared.

It is therefore common practice for allocation policies to include terms such as "approximately", "in the region of" and/or "around" when identifying levels of development that are likely to be delivered. The reason for such terminology is that the true capacity of the site is only likely to be understood at planning application stage once detailed survey and design work has been completed. A definitive figure of "127 new homes" runs the risk of being unnecessarily restrictive resulting in the Plan not making the best use of land.

It is noted that the emerging Local Plan adopts a less definitive approach in respect of many of its other proposed allocations. For example:

- Land to the south of Harepath Hill (Seat_03) - "This site is allocated for around 75 dwellings" (page 88)
- Land off Harepath Road (Seat_05) - "This site is allocated for around 130 dwellings" (page 88)
- Land west of Two Bridges Road, Sidford (Sidm_06a) - "This land is allocated for development to the north of Sidford to accommodate around 30 new homes." (page 89).

Other examples demonstrating this point exist throughout the emerging Plan and we therefore request that the same approach is used for Sidm_01 with suggested wording set out in response to 4 (c) below.

Perhaps more fundamentally, we are concerned that the emerging Local Plan fails to fully recognise the true capacity of the site at Woolbrook Road. This is currently considered to be 127 dwellings which is identical to the capacity set out at Regulations 18 stage. However, whilst the site boundary and land area remains identical, it should be noted that the Regulation 18 Plan, in addition to the 127 new homes also included a requirement for 0.5ha of employment development on the site.

The employment requirement has NOT been maintained into the Regulation 19 Plan which, logically, allows for a proportionate increase in the number of new homes to be provided by the allocation.

Persimmon has investigated the site capacity in detail and has concluded that the true capacity of the site, taking into account all known constraints, is approximately 160 dwellings.

The requested amendment to the capacity of the site should also be considered in the context of comments made on behalf of Persimmon in respect of Strategic Policy SP02: Levels of future housing development and, specifically, the stepped trajectory for the delivery of new homes. Persimmon is confident that the Sidm_01 site will be delivered in full during the first period of delivery set out in SP02; that is to say 2020/21 to 2031/32. It therefore follows that increasing the capacity of the site to that which can be reasonably accommodated would play an, albeit small, role in reducing the the level of change between the two delivery periods and reduce any criticism that may be made by others of the stepped approach.

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.: Consistent with the comments set out in response to question 4 (b), and in order to ensure that the Plan is found to be positively prepared, effective and justified, we request that policy SD06 be amended to read (changes in capitals)

"Land south-west of Woolbrook Road (Sidm_01) This land is allocated for development of AROUND 160 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. The development will need to maximise opportunities for localised improvements/ contributions to enhance sustainable travel modes".

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.: Persimmon is a national house builder and has vast experience in delivering new homes across the country.

Persimmon also owns the Land south west of Woolbrook (Sidm_01) allocation which is intended to deliver the majority of new homes identified for the Town and it is therefore considered that Persimmon's participation at the Hearing Sessions would be useful for the appointed Inspector(s).

Full name: Joseph Marchant

Organisation (where relevant): Context Logic Ltd

Other party name (if relevant): Messrs Ford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I write to you regarding the above-mentioned site as part of the Regulation 19 Consultation. The site is also referred to Sidm_08_041B in some documentation. The site was also referred to as Sidm_27 in the HELAA 2022. The site has been put forward by my client for consideration for housing allocation, and evidence has been provided to the Local Authority as to the requirement for this. In addition to the original Call for Sites, further evidence was supplied to the LPA on 10th June 2022. At that time, the site was referred to under FS-Case-419961866. Further to this, a consultation response to the East Devon Local Plan was provided to the HELAA of November 2022, with the reference Sidm_27, and the Local Plan reference LP_Sidm08_041B. Further to this, additional evidence and a request was supplied to the Panel Members and to the Policy Team on 11th April 2024, related to a further request, moving forward, to change the allocation to housing.

2.0 Representation to the Consultation Local Plan We note that on page 4 of the Summary Site Selection Report, the site was sifted out of the process for selection for housing allocation. The site's extant approval 18/1094/MOUT is the cited reason for being sifted out. We identify why this should be reconsidered, we have previously supplied evidence as to why the change in allocation is required to support 2 employment investment at Alexandria Industrial Estate, and secure an attractive proposal for a housing allocation at Sidford. The evidence and request for the allocation seeks to support the ambition to deliver a new access at the Alexandria Industrial Estate, which requires investment release from the Sidford Employment site. My client, Messrs Ford, own both sites. They currently have 36 businesses occupying accommodation at the Alexandria Industrial Estate.

3.0 Why the shift in drive to deliver Alexandria Industrial Estate over Sidford: Until the availability of the Alexandria Industrial Estate ransom strip, the Sidford employment Site was promoted for the employment growth. The Sidford Site appeared in the Draft Local Plan in 2012. It was Adopted as the allocated site in 2015. An application was submitted in line with the allocation in 2016, and refused. A reduced scale scheme was submitted in 2018 – it was also refused. The applicant appealed the refusal, and the Appeal was allowed in Aug 2019. Conditions were discharged from 2019 to 2022, alongside Reserved Matters for Scale and Appearance. Significant development commenced, and approximately a third of the site has been remodelled, with significant level changes associated with drainage betterment and watercourse remodelling. The area has been relandscaped, meadow seeded, there are new enclosures, with drainage changes and the planting of 2500 trees and hedge plants. These works have been done in accordance with Approval 18/1094/MOUT. This work was ceased once the ransom strip at Alexandria Industrial Estate became available. The works mean that application 18/1094/MOUT is extant. Current spending on the Sidford site, most notably the two EIA's and extended planning battles, resulting in Public Inquiry have taken costs to the present day to £2.5 million. Historically, the Alexandria Industrial Estate had been stifled from an ability to secure intensified development due to inappropriate access provision. This had stifled intensification and improvement to the site for 30 years. The LPA is aware from evidence previously provided that a ransom strip that would have enabled better access, was overpriced at a £1m asking price. (Evidence on this point was the subject of debate, and evidence in the 2012 Local Plan Inquiry, alongside cost analysis for a road construction, which was priced between £750,000 and £1000,000, dependent on design options). Following the passing of a former owner, the ransom strip land became available at the Alexandria Site at a reasonable price. Unfortunately, this did not occur until after the consent was achieved and works had started at the Sidmouth Employment Site. The first opportunity to purchase the ransom strip at a reasonable price was grasped by my clients, and has enabled the principle of improved access to a large part of the Alexandria Industrial Estate. The ransom was secured by my clients' in 2021. My clients', who own both 3 sites (Sidford and Alexandria), had always hoped to redevelop the Alexandria site and were frustrated by the ransom strip. Having secured the ransom strip, they immediately developed an application to transform this site. This was submitted in Sept 2022 and approved in Nov 2023, with no material changes to the original submission. Landscaping was a Reserved Matter and is presently submitted. All other Prior Approval Conditions are submitted for determination, or are already approved. The present-day costs for securing the ransom strip and the approvals so far for the Alexandria Industrial Estate have exceeded £250,000. From the chronological history referred to above, it can be demonstrated that my clients have not stopped with their endeavours to secure new employment development, albeit there is now a change in focus. The focus is now to redevelop the Alexandria Site in accordance with its approved application 22/2063/MOUT once all

Conditions are determined (approved) and monies have been raised from the complete or partial disposure of the Sidford site for housing. Up until the ransom strip became available, it was my client's expectation that the Alexandria site would be sold, potentially for housing as a brownfield site. The ransom strip purchase changed the fortunes of this site, subject to being able to raise capital from Sidford.

4.0 Why is the allocation of Sidford (Sid-08) so important and desirable: In order to promote delivery of employment space, it is now important to secure some change to the allocation of the Sidford site. Correspondence issued in April 2024 highlighted the potential. Correspondence was received from the LPA from Cllr Todd Olive, who was chairing the Council's Strategic Development Panel at the time (a blend of Officers and Members with a focus on guiding development at a time where needs were not met by adopted policy). On behalf of the Panel, he identified that we needed to wait until the considered process of the Local Plan in terms of future allocations, and we were advised that the Panel was aware of our requirement to see a shift in the allocation for the Sidford Employment Site. As mentioned, all Reserved Matters and Prior Approval Conditions have been disposed of in the case of the Sidford site, and most Prior Approvals have also been discharged for the Alexandria Site (some are submitted but not yet determined, others are approved). Also, there has been significant investment in extant works at Sidford. My client has been out to construction tenders and is therefore well versed in the costs associated with both schemes. The highway provision alone for Sidford is expected at £950,000, and it is not dissimilar at the Alexandria Industrial Estate. Other costs related to remodelling levels, new drainage, new landscaping, and new buildings means the schemes exceed £4m in both cases, and exceed the demand for employment. It is important to note, the existing Local Plan 2013-2031(outgoing) never expected the increase in employment space at Alexandria Industrial Estate. It is impossible for both schemes to be delivered with the additional costs required for the wider infrastructure and 4 employment accommodation. My clients accommodate the largest share of employment in Sidmouth in the Alexandria Industrial Estate and on the High Street, as such they are clear that there is insufficient demand for both sites. Alexandria Industrial Estate largely has tired accommodation, and the approved application 22/2063/MOUT details the significant benefits it would bring, including environmentally, socially, aesthetically, to drainage, and employment space availability and employment space quality etc. There has also been overwhelming public support for this scheme. Conversely, at Sidford, we are painfully aware that there has been the public preference to switch this site for 100% housing, hence the delay in securing the approval for the employment scheme. My client would support 100% housing allocation. A 100% allocation could secure funds to deliver the Alexandria Industrial Estate's scheme, but at 75% housing, there would be capacity from a capital receipt to deliver a significant proportion of the Alexandria proposals. My client therefore seeks a minimum of 75% site coverage for housing (approx. 52 units). Without some shift from

the LPA, it will be impossible to lever investment, and I would like to return the LPA's memory to the knowledge that it was my clients' long held expectation that the Alexandria site would be sold as part of the delivery of the Sidford site. With significant employment uplift now potentially available for the Alexandria site, it would be desirable to see employment investment on this site, and to see all or part of the Sidford employment site allocated for housing. There are 36 businesses, which are detailed in the Alexandria application, that seek improved employment space and growth. These businesses' preferred location is the Alexandria Site, and a shift in policy position in the Emerging Plan could enable investment on this site and potentially a more publicly desired mix of use at the Sidford Site. I appreciate that the LPA may not naturally balance the financial arguments related to a single ownership of both sites, but unless the LPA can engage with the need to create financial viability for one site supporting delivery of the other, then the potential for much needed employment investment will be stifled. Plus, the additional housing is surely welcomed. The LPA recognised the need for financial viability, and needed to sell the Knowle Council Offices to secure investment for new Council Offices at Honiton, and this has created a delivery opportunity. My client's approvals are all in place, and we now need assistance to create the Alexandria scheme. In the Consultation Draft Local Plan, I note that there are other allocations for employment and housing at Sidford. Whilst my client has no objection in principle to these allocations, it remains that his site offers a greater volume of build capacity, and in our view, it is unwise to stifle this capacity on the basis of giving no reconsideration to the Sidford Site Sidm_08. It seems to us remarkable that only 6 sites were sifted out from consideration in Sidmouth (page 4 Summary Site Selection Aug 2024), and that the Sid_08 was one of them, given the expressed need for a switch in the use of the site from extant employment to a housing allocation. We feel the switch 5 would also better complement the expected housing allocation on the opposite side of the road. The existing works (extant works) at Sid_08 have cost a significant sum, and would equally contribute to the landscape amenity and drainage betterment of a housing scheme. The site details in the approval result in a Development area within FZ1, and as such, all the land is capable of providing good housing land. My clients therefore object to the exclusion of their site from the Emerging Local Plan with respect to any housing allocation. For your background information, I enclose again the masterplan for a housing solution, which was supplied in April 2024. This visualisation indicates how the site could be fully developed with housing. There would also be a potentially workable option for my clients to retain approximately a quarter of the site for employment purposes. If land for employment was retained, it would be in the northeast corner of the site and could be no more than 25% of the site if my clients are to obtain sufficient resource to make good headway in the delivery of the Alexandria scheme. There has been significant interest in the site Sid_08 from housing developers, and from nursing homes, but there has been no interest from separate employment providers other than the employment created by nursing care or major

food retail (none of which align with the present (outgoing) policy position). The rent roll information has been previously supplied and clarifies why revenue is insufficient to make a case for capital investment on both sites. The spend to date for both sites (£2.5 million and £250,000) and the future projected costs to see one of the sites delivered (in excess of £4 million for either site) is a factor in why both schemes are not viable. The investment at the Alexandria Site is dependent on a more joined up understanding of how the Alexandria and Sidford sites are linked in terms of investment. We hope, in memory of the Council's own need to upgrade its office site at the Knowle to a new location, that it will understand the importance of this representation and allocate the Sidford site for housing. If the Council cannot support this request for allocation, we would hope that evidence can be placed before the Inspector in order that the Inspector can scrutinise the points made above and previous background.

Full name: Andrew Ross

Organisation (where relevant): Turley

Other party name (if relevant): Bloor Homes Exeter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Bloor Homes control Land at Sidford High Street, Sidmouth as previously submitted to the Council during previous plan making stages. The land controlled by Bloor Homes amounts to some 19.34ha and has been assessed during the preparation of the Local Plan with reference numbers Sidm_02 and Sidm_35. This land to the North of Sidmouth could provide a net residential area of around 6.4ha and up to 200 new homes, including affordable housing. Development at this site could also contribute substantial Green Infrastructure, including new areas of public space, providing additional amenity for this part of the town and linking into the wider designated landscape in this part of East Devon. Strategic Policy SD06: Sidmouth and its development allocations [OBJECT]

2.9 There is clear potential for more development to be accommodated at Sidmouth to meet local needs, where the plan for East Devon could and should be doing more to deliver elevated levels of new housing, including affordable housing.

2.10 It is not clear that the status and potential for development at Sidmouth has been reflected in the policies and allocations in the plan, where other lower tier settlements are being proposed for higher levels of development. This includes having regard to Sidmouth as an existing centre of population, with the second highest resident population in the District (only behind Exmouth), specific pressures on affordability (and so the need for further affordable housing delivery) and with demographics skewed towards an ageing population (with additional pressures on housing supply and the ability to provide housing for economically active residents to support the health and vibrancy of the town). In this respect it is not clear that the spatial strategy has been followed and is effectively informing the policies and approach for the plan, as a whole.

2.11 The delivery of just 333 homes over the 15 years of the plan period at Sidmouth (as housing trajectory at Appendix 2 of HOU-001) is not a proportionate response to the role and function of Sidmouth as a key main centre within East Devon.

2.12 The Council has within the plan acknowledged that further land (located within designated landscapes, including the National Landscape) will need to be released for residential development. Sidmouth is a constrained settlement, surrounded by the designated National Landscape and other constraints (including Coastal Protection zones), with a lack of sufficient suitable development opportunities within the existing settlement, and/or on previously developed land. However, these constraints need to be balanced with the settlement's high sustainability credentials, it is therefore an area of suitable for additional growth, to support and in accordance with the spatial strategy at SP01.

2.13 The evidence that supports the plan has shown that development on greenfield sites at and around the town of Sidmouth (and in other locations) is necessary and justified in order to meet needs arising in the District during the plan period. This includes development on land within designated landscapes, including the National Landscape.

2.14 At Sidmouth the draft plan has chosen to allocate one larger and two smaller sites for new housing at the town (representing a total of 172 homes, at a capacity of 127, 30 and 15 homes respectively). A range of other sites have been discounted as being unsuitable, or less preferable, than those that have been selected.

2.15 The excluded sites include land being promoted by Bloor Homes to the North of the town (at Sidford High Street), comprising LP_Sidm_02 and LP_Sidm_35. The basis for the exclusion of this site, is not clear, on the basis that it is an otherwise suitable and deliverable site, and offers the opportunity for significant new strategic open space (as a public park), which would be an asset to the town and which would help to mitigate impacts that might otherwise occur in respect of the landscape in this area. This provision is not proposed or possible as part of development associated with the sites selected as part of the LP consultation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To elaborate on issues raised and respond as appropriate during hearings.

Full name: Neill Chippett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Not legal because it does not meet the necessary safety and access requirements.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The field on Burscombe Lane Sidm_31 needs to be removed from the plan

1. Extremely difficult to respond online.

2. Not legal, inadequate access to field.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Unsound because 1. The road Burscombe Lane is prone to subsidence. 2. Access too narrow. 3. No room for pavement. 4. Potential flooding issues.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

1. Failure to cooperate with Highways.

2. Failure to cooperate with residents.

3. Failure to cooperate with National Landscapes.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is vital to protect any areas that are AONB or National Landscape. Common sense and logic need to be voiced and not legal terms which many people find impossible to understand.

Full name: Gillian Croney

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid

rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

I do not believe that it is possible to provide adequate modifications to make Sidmouth-31 a viable development. The only acceptable solution is to reject this site and focus on more suitable sites elsewhere. For just 15 houses - it makes much more sense to leave this field as National Landscape and build elsewhere. Otherwise once these 15 get built you'll then set a precedent to build some more next door and so on until the countryside is lost forever. Countryside which brings thousands of visitors to Sidmouth every year. We are meant to be protecting the local wildlife & countryside not destroying the delicate ecosystem that we currently enjoy.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I feel very strongly about the need to block this development and believe that I need to be at all hearing sessions to be fully knowledgeable about future developments and to feedback my concerns. There is mention of a protest group specific to Sidmouth-31 for which legal representation is being investigated - which I intend to join adding another reason to request participation.

Full name: Alan Cunningham

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all

house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

I do not believe that it is possible to provide adequate modifications to make Sidmouth-31 a viable development. The only acceptable solution is to reject this site and focus on more suitable sites elsewhere. For just 15 houses - it makes much more sense to leave this field as National Landscape and build elsewhere. Otherwise once these 15 get built you'll then set a precedent to build some more next door and so on until the countryside is lost forever. Countryside which brings thousands of visitors to Sidmouth every year.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I feel very strongly about the need to block this development and believe that I need to be at all hearing sessions to be fully knowledgeable about future developments and to feedback my concerns. There is mention of a protest group specific to Sidmouth-31 for which legal representation is being investigated - which I intend to join adding another reason to request participation.

Full name: Helen Dimond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Insufficient land allocated for housing (see comments for SD10)

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.: Allocate more land for housing

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As for all my other comments

Full name: Richard John Eley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In respect of Sidmouth, I consider that the identification of the BUAB should have preceded site selection. I also do not think that the site either side of Fortescue Road should have had the area intended for community open space in The Byes deleted. This was undertaken without the consent or knowledge of the applicant, and I would like to see the legality of this procedure questioned and examined. The deletion arose from a mistake, as was conceded in a SPC document, but this mistake was then repeated. I very much doubt that this was legally compliant.

In the case of the Sidbury allocation at Furzehill, this site was selected by the SPC because it did not have an adequate access and would not therefore obtain planning consent. I do not believe this is a legitimate mechanism for site selection. Confirmation of this is available on Youtube.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The Fortescue Road site has never been scored or assessed and has therefore not been considered at all by the SPC. Instead, officers independently and without authorisation from the landowner/applicant, submitted a very different proposal which was much less attractive and deliverable.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

I think all submissions should be treated equally and fairly, and I think all mistakes, which are bound to occur, should be admitted rather than denied. They should then be corrected in order to allow all sites to come forward and be fairly considered.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The Fortescue Road site should be reconsidered as a matter of urgency by the Strategic Planning Committee, as should the Furzehill site. I do not think it is proper for sites to be allocated on the basis that they cannot be delivered.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I think all submitted sites should be considered, and officers should not be allowed to unilaterally and very significantly, and without the knowledge, let alone agreement, of the applicant.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like the legality and fairness of the procedures adopted for Sidmouth and Sidbury to be explored.

Full name: Ian Philip Hornby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2(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 use of an online portal discriminates against the elderly in an area where 37% of the population is aged over 60.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

1) The site is within an area of National Landscape, with Beacon Hill local nature reserve, managed by the RSPB, with its Dartford Warblers and Nightjars and much other wildlife less than a mile away. Core Hill deciduous woods are much closer.

2) The junction of Burscombe Lane with the A3052 main road to Exeter is dangerous for large vehicles, and far from ideal for small vehicles limited visibility and tight corners. Burscombe Lane itself has a narrow single lane pinch point between boundary stone walls.

3) I am concerned about water runoff from the site during periods of heavy rain. I live in Corefields and get surface water running into the garden from the field and then forming a small stream down the path at the side of the house and across the front lawn during such periods, which happens several times a year. I dislike the situation as it is and certainly do not wish the situation to get worse building on the site will reduce its ability to absorb rainfall. I also understand that the local sewage system struggles with existing levels of demand.

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.:

2) A redevelopment of the junction? Difficult in the extreme in such a tight space - 3) Substantial drainage works (increasing risk of flooding downstream?)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

So I can more fully explain the issues with water runoff from the site.

Full name: Gordon Jenkins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The allocation of Sidm_31 and its access via Windsor Mead is based on a late, superficial and incomplete consideration by the Highway Authority (Devon County Council), which has not been subject to public consultation until this stage. The Highway Authority's justification for use of Windsor Mead ignores any consideration of the junction of Windsor Mead with the A3052, which does not meet the requisite standards set out in the Manual for Streets (DfT et al 2007) in respect of minor arm visibility splays, which are less than 10m.

I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which "could be developed" which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be "squaring off the built edge". This "built edge" dates back to housing built in the 1960s when regulations were different and the issues you should be considering are

current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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.: Policy SD06 Sidm_31 should be removed from the Local Plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details 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 recommendation to access Sidm_31 via Windsor Mead has ignored the poor (less than 10m) minor arm visibility splays, which do not meet the minimum criteria set out in Manual for Streets (ibid). A link between Sidm_31 and Windsor Mead cannot be achieved without the purchase of land from two Windsor Mead properties; if these plots cannot be secured by negotiation, the local authority would need to use its CPO powers on behalf of the developer.

To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development .

Access - Access via Burscombe Lane was quoted as a key reason (quite rightly) for the development being refused previously. This lane is very narrow allowing only single car access, is prone to subsidence and extremely dangerous to exit onto Sidford High Street. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be

positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area.

Transport - Other potential building sites in Sidmouth fall within easy access to public transport. Sidmouth_31 does not have bus stops close by meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one.

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.: Policy SD06 Sidm_31 should be removed from the Local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

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.: Yes, but the recommendation to access Sidm_31 via Windsor Mead was inserted into the Regulation 19 Local Plan on the basis of an '11th-hour' email exchange between EDDC and DCC, which means it is not being subject to scrutiny until now. Not good.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Francesca Johnson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There has been very limited consultation with arbitrary decisions made on the choice on Housing and Employment sites. The original EDDC plan presented in 2022 showed proposed and rejected development sites in the Sid Valley. Subsequently in October 2024 and after, significant changes a new site was introduced without consultation as follows – Sid_31 – Sidford- adjacent to Windsor Mead – This was listed in the original plan as a ‘Rejected Site’ but then popped up without consultation as a new Housing site in September/ October, 2024. Sidm_31 – Sidford – land by Windsor Mead and Burnscombe Lane. This is outside the built up boundary of Sidford. This implies a loss of National Landscape (former AONB), and is an over development of a small site with poor access. because due process was not followed and proper consultation was not made - and also because many areas within Sidmouth that are close to amenities and not National Landscapewhere 15 houses could be built - this development should be removed from the plan.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Sidmouth_31 from the plan and focus on land close to Alexandria trading estate instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: For the same reasons as above. Proper consultation was not carried out.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Nobody locally was consulted - and property owners purchasing houses next to this site during 2024 were told the building proposal had been rejected.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This build site will really destroy the area where I live.

Full name: Francesca Johnson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

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2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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or paragraph. Please be as precise as possible.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all

house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

I do not believe that it is possible to provide adequate modifications to make Sidmouth-31 a viable development. The only acceptable solution is to reject this site and focus on more suitable sites elsewhere. For just 15 houses - it makes much more sense to leave this field as National Landscape and build elsewhere. Otherwise once these 15 get built you'll then set a precedent to build some more next door and so on until the countryside is lost forever. Countryside which brings thousands of visitors to Sidmouth every year.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I feel very strongly about the need to block this development and believe that I need to be at all hearing sessions to be fully knowledgeable about future developments and to feedback my concerns. There is mention of a protest group specific to Sidmouth-31 for which legal representation is being investigated - which I intend to join adding another reason to request participation.

Full name: Julie Kent

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There seems to have been little consultation with the residents of Sidford relating to the inclusion of this site for housing. The policy on National Landscape says that the boundaries are set by the Secretary of State and cannot be changed through the Local Plan process(12.7).

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of this site for housing is inconsistent with the policies set out in the draft plan. Those policies relating to National Landscape, Areas of Strategic Visual Importance and Flood risk management.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site should be removed from the Plan.

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There seems to have been little consideration of Transport and Infrastructure aspects relating to this site. Access unsuitable from Windsor Mead as the acquisition and destruction of two private gardens would be necessary. Access via Burscombe Lane is also unsuitable due to the narrow width of the lane. Both exit onto the busy A3052 at poorly constructed junctions. Assessment of Infrastructure has

not been carried out - footpath and pedestrian access is inadequate, sewage and flood risk has not been taken into account. Environmental degradation would occur through the destruction of a section of Devon hedge, excavation on site, lighting and pollution of the dark skies. Visual impacts would be negative as views from Trow Hill, Salcombe Hill of housing on this site would be affected. The protection of the landscape and biodiversity within the Sid Valley would be adversely impacted by development on this site which is on rising land within the National Landscape.

Full name: Elaine King

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development . Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac. Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders. Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned. Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps

have been take to prevent this - extra building should not be allowed. Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point. Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes. View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods. Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

I do not believe that it is possible to provide adequate modifications to make Sidmouth-31 a viable development. The only acceptable solution is to reject this site and focus on more suitable sites elsewhere. For just 15 houses - it makes much more sense to leave this field as National Landscape and build elsewhere. Otherwise once these 15 get built you'll then set a precedent to build some more next door and so on until the countryside is lost forever. Countryside which brings thousands of visitors to Sidmouth every year. We are meant to be protecting the local wildlife & countryside not destroying the delicate ecosystem that we currently enjoy.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I feel very strongly about the need to block this development and believe that I need to be at all hearing sessions to be fully knowledgeable about future developments and to feedback my concerns. There is mention of a protest group specific to Sidmouth-31 for which legal representation is being investigated - which I intend to join adding another reason to request participation.

Full name: Charles King

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development . Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac. Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders. Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned. Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps

have been take to prevent this - extra building should not be allowed. Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point. Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes. View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods. Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To develop

Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development . Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal

and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac. Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders. Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned. Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been take to prevent this - extra building should not be allowed. Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point. Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes. View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods. Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid rules about positioning of reflective surfaces etc add substantial cost to any building

project at Sidmouth_31. This is another reason why other sites should be prioritised instead.

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.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

Full name: Sheila & Stephen Maycock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Specifically re section 14 Site selection Sidm_31.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. I live at Windsor Mead, in one of the houses previously built in the 1960's/70s on an adjacent piece of land and appreciate the wide ranging views from my property across the Sidbury/Sidford non coalescence area. Any new building on site 31 would not drastically impact on those views and would afford similar views to newly built properties.

2. If properties were built in keeping with the low rise nature of existing properties this would reduce any impact on the area.

3. I note Highways have yet to be consulted. Burscombe Lane is the most direct route to any new development, which already has extended access to the A 3052 in the form of a triangle to manage access and egress.

4. There is a suggestion that access could also be via Windsor Mead, which makes far less sense driving vehicles on quiet, narrow, residential streets to reach the end of a culdesac with no current way through to the site. The strip of land that would need to be crossed is, I believe, owned by 14 and 13 Windsor Mead.

5. The egress from Windsor Mead onto the A3052 is tricky. High hedges make it difficult to see out, visibility isn't clear as cars and lorries come quickly around the corner from the right & we often have to edge forward then quickly reverse back up the hill to avoid traffic speeding around the corner on the right. Visibility of cars coming from the left up the hill isn't great either. In order to turn left larger cars are prone to swing out into the opposite lane. There are often cars parked on the roadside at Windsor Mead, near the

junction, which causes more problems with cars turning into Windsor Mead. Additional traffic use of Windsor Mead to access 15 new homes would only exacerbate these issues. Additionally the width of Winsor Mead at the junction with the A3052 is inadequate for 2 cars to safely turn in and out of WM together.

6. As a local resident I am aware that drainage from the site is poor. During times of high rainfall there is a large amount of water that finds its way off the field in question, across the garden of 14 Windsor Mead, causing large torrents of water to flood down the road.

Full name: Alistair Rice & Nita Patel

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The allocation of Sidm_31 and its access via Windsor Mead is based on a late, superficial and incomplete consideration by the Highway Authority (Devon County Council), which has not been subject to public consultation until this stage. The Highway Authority's justification for use of Windsor Mead ignores any consideration of the junction of Windsor Mead with the A3052, which does not meet the requisite standards set out in the Manual for Streets (Off et al 2007) in respect of minor arm visibility splays, which are less than 10m.

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.: Policy SD06 Sidm_31 should be removed from the Local Plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details 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 recommendation to access Sidm_31 via Windsor Mead has ignored the poor (less than 10m) minor arm visibility splays, which do not meet the minimum criteria set out in Manual for Streets (ibid). A link between Sidm_31 and Windsor Mead cannot be achieved without the purchase of land from two Windsor Mead properties; if these plots cannot be secured by negotiation, the local authority would need to use its CPO powers on behalf of the developer

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.: Policy SD06 Sidm_31 should be removed from the Local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

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.: Yes, but the recommendation to access Sidm_31 via Windsor Mead was inserted into the Regulation 19 Local Plan on the basis of an '11th-hour' email exchange between EDDC and DCC, which means it is not being subject to scrutiny until now. Not good.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin & Pam Perfect

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As residents requiring vehicular and pedestrian access via Windsor Mead to Sidford High Street, we understand that Devon County Council has recommended that a proposed development of 15 homes under the emerging Local Plan designated for the horse field between Burscombe Lane and Windsor Mead should be granted access via Windsor Mead, in preference to providing access via Burscombe Lane.

We would make the following observations re suitability of Windsor Mead to take extra traffic:

1. Windsor Mead is a thin estate road with awkward/substandard junctions serving its various offshoots, as well as providing access to the rear of Sidford High Street.
2. Vehicular passage is often impaired by inconsiderate parking on or near to its various junctions, and the lower part is regularly used for parking by residents of nearby Sidford High Street, visitors, delivery trucks and contractors working locally.
3. Access from Windsor Mead onto Sidford High Street westwards can be quite dangerous as there is an absence of visibility splay down the hill (to the East) due to a high bank. This means vehicles need to edge into the main road to see if the road is clear before they can proceed onto Sidford High Street up the hill in a westerly direction - this is a potentially a dangerous junction, especially as adherence to the 30mph limit is not exactly universal.
4. Similarly, vehicles trying to access Windsor Mead from Sidford High Street (from either direction) cannot proceed safely if there is a vehicle approaching the junction down Windsor Mead - again this is potentially dangerous. Vehicles parked in close proximity to the bottom of Windsor Mead can pose an additional hazard.

5. Adding extra traffic movements emanating from 15 additional homes would, in our opinion, potentially exacerbate these current access problems.

6. The junction at the bottom of Burscombe Lane appears much wider, does not appear to have impaired visibility splay onto the main road in either direction, and currently provides access to far fewer residential properties than the Windsor Mead estate. Please take these observations into consideration in determining this part of the Local Plan, and confirm receipt.

Full name: Jane Stonham

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing concerning the plans for policy Sidmouth_31 and the access for this proposal. The access from Burscombe Lane and the alternative Windsor Mead are both narrow with very poor visibility and though the traffic speed is at 30 mph the narrowness of Sidford high street and speed and quantity of traffic let alone heavy goods vehicles means safety would be compromised and cause further congestion in this restricted area. Also sewage facilities in this area are an unknown quantity (SW water have no record of drains) which are old and barely cover this area let alone more housing. Access to the field is very restricted through private property or a single thoroughfare and the building encroaches on an area of national beauty. There are other sites more suitable and with better access and facilities Thank you for your consideration of these points. I would be interested in being at the hearings discussing this plan

Full name: Dr. M. L. Street

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Local Plan Sidmouth 31 – Land Off Burscombe Lane The application is for building in a zone designated as a protected zone known as “Natural Landscapes”, previously AONB. These areas should only be built on as a last resort when all other areas not part of “Natural Landscapes” have been considered. Some would argue that they should not be built on at all. Most landscapes are made by humans but nature does not have straight lines or have regular blocks. To make the site look more uniform by filling in to make a more regular block is a very poor argument and rather it would make the site look less natural. Also it will increase the likelihood of extending the building line in the future beyond the public footpath and in to the next field. The field in question has probably not been ploughed since the 2nd World War and could well be classed as an ancient meadow. Since it is private land and has been heavily grazed, it is difficult to examine but could well be rich in flora. The two hedge lines, one next to the public footpath and the other along Burscombe Lane both have the criteria needed to qualify for protected status. They are both very old but more importantly, they contain a very diverse flora. The hedgerow along Burscombe Lane contains the plant Dog`s Mercury which is recognised as a marker for identifying an ancient hedgerow. Access to the site would most likely damage this hedgerow.

2. The access and exit to the site from Burscombe Lane is only just one vehicle wide at one point, and is narrow along the whole length of the field to be built on. There is no public footpath and to be able to create these would damage the hedgerow and create an “urban” feeling in a rural site. Access to the A3052 from Burscombe Lane is already difficult and would be exacerbated by the increased travel.

3. Although not as steep as land further down Burscombe Lane, the hard landscaping on the site will add a large amount of water in to the brooks feeding the River Sid and increase the risk of flooding in the town. The grassland in the field will currently hold water which will mitigate against flooding.

4. The height of the proposed buildings is not in keeping with the mostly single storey bungalows in the adjacent areas and they are inappropriate for an area within the “Natural Landscapes”.

Full name: Martin Thurgood

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: DEVELOPMENT IN THE TOWNS AND VILLAGES The Policies fail to address Objective 2 of The Vision, that is, tackling the climate emergency, Objective 6, high quality development, and Objective 9, encouraging walking & cycling. For Objective 2, it fails to recognise that Exeter is the major draw for employment and that most journeys will be made between there and the new housing areas. Placing all new development close to Exeter is essential to achieving Objective 2. Objective 6 will not be met by isolated developments on the peripheries of existing settlements. Only large-scale development can provide for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. For Objective 9, permitting 'edge development sites' for new housing at existing communities fails to address the Objective. It is unrealistic to expect people to walk or cycle given the distances and the natural terrain. To give but one example, development on the edges of Ottery St Mary are too far for people to walk to the central shopping area (and other facilities) and the steep valleys further severely mitigate against foot and cycle travel for a number of the locations. Moreover, off-street vehicle parking in the central area is already used to capacity and your proposals fail to address the consequences or provide for any positive resolution. Policies should be radically redrafted to address such matters. In particular, it should advance the proposed second new community, WS01, as the solution and increase its size such that development on the edges of existing settlements are unnecessary.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
See response to Q2(b)

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See response to Q2(b)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See response to Q2(b)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I have no idea and am therefore neutral on the point: but you do not give me that option.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

SD07

Full name: CORAL CURTIS

Organisation (where relevant): Grass Roots Planning

Other party name (if relevant): BROADCLYST LVA LLP (LVA)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land West of Whimble Road, Broadclyst – Brcl_12 Broadclyst contains a wide range of key everyday facilities including primary (Broadclyst Community) and secondary (Clyst Community College) schools, two pubs (New Inn and Red Lion), social club, a local shop and post office (Broadclyst Stores), doctor's surgery, church (St John the Baptist), village hall (Victory) and the Broadclyst Sports Centre. All of these facilities are accessible from the proposed site. The site has limited constraints for development and the technical work undertaken to date has not identified any significant issues that would preclude the site from development, and the technical team has prepared evidence to underpin the proposed masterplan. The proposed masterplan for the site seeks to deliver a mixed-use development of up to 145 dwellings (including affordable and self or custom build units), 0.6ha of land providing offices and light industrial employment space (Use Class E), extensive open space and ecological enhancements, along with the proposed new highway, site entrances and supporting infrastructure. The residential development will likely comprise a mix of 1, 2, 3 and 4 bedroom properties of varying styles, ranging from a small block of apartments to detached dwellings. Development will both be front-on and side-on to Whimble Road, and it is anticipated that the design would be more traditional in appearance and utilise materials found in the local area. The employment areas proposed are located within the east of the site on the former Winter Gardens land, and are proposed to be designed to adopt a barn like style to assimilate them into the more rural environment, as opposed to converting

the existing buildings. Two accesses are proposed to be taken from Whimble Road approximately 90m apart – this is to provide separate access for the employment and residential uses. It is anticipated that pedestrian and cycle connections will be made to the existing Public Right of Way (PRoW) network on Town End and Green Tree Lane. 51% (5.55 hectares) of the site is provided as formal public open space for both existing and future residents. This includes a community parkland with junior grass football pitch to the north, ecological areas, a new play area, and allotments. Furthermore, informal public open space is proposed including a central green spine running north-south through the centre of the site. Drainage in the form of two attenuation basins are proposed within the north and centre of the site, to hold surface water runoff before discharging it at a greenfield run-off rate into an existing ditch. The benefits of the scheme are wide-ranging and substantial, and include the following:

- Provision of affordable housing
- Provision of market housing
- Provision of custom and self-build homes
- Delivery of an employment allocation
- New public open space and a community parkland, in excess of the policy requirements
- Biodiversity Net Gain in excess of the Government's 10% target
- Improvements to Whimble Road
- Jobs in construction We have also examined other technical matters including highways safety, flood risk and drainage, ecology, landscape, heritage, trees, air quality, and health, and have identified no adverse effects would outweigh the benefits of the scheme. The masterplan, therefore, responds to the constraints and opportunities of the site, and seeks to provide a generous landscaped edge to the north of the site to ensure a suitable transition to the rural hinterland beyond. Furthermore, it is clear that the development is deliverable, and provides a highquality, well-balanced, sustainable community. We will also seek clarification with planning policy officers regarding the proposed allocations map including the areas of Green Space shown. Conclusion We support the emerging Spatial Strategy and welcome the site's (ref. Brcl_12) inclusion as a draft allocation to help meet the identified housing and employment needs. We do, however, ask that the Council carefully considers the constructive comments provided in relation to endeavouring to meet the full housing need for the district at this stage, and other more specific policy requirements. It has also been demonstrated and is recognised by East Devon District Council that Land west of Whimble Road, Broadclyst (ref. Brcl_12) is a suitable, sustainable, accessible and deliverable site for residential and employment development. Furthermore, it is anticipated that an outline planning

application, with all matters reserved except for access, will be submitted in April 2025. Based on the details provided within these and previous representations, we, therefore, hope to see the allocation for the site maintained – once the Local Plan Examination begins, a planning application will be before the Council, which will demonstrate the site's deliverability to the Planning Inspectorate to underpin the allocation of this land.

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 RESPOND, AS REQUIRED, TO ANY QUESTIONS IN RELATION TO POLICY SD07 AND IN PARTICULAR SITE BRCL_12.

Full name: CORAL CURTIS

Organisation (where relevant): Grass Roots Planning

Other party name (if relevant): BROADCLYST LVA LLP (LVA)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic Policy SD07 sets out the development allocations at Broadclyst. This states the following: “The sites/areas listed below, as identified on the Policies Map, are allocated for development. Land west of Whimble Road, Broadclyst (Brcl_12) combined with Land to east of Town End, Broadclyst (Brcl_29) Development of these two sites, on the eastern side of the village, will need to come forward to an agreed Masterplan that provides for a comprehensive development scheme for both land areas. Vehicle access to the combined sites will need to be from Whimble Road with vehicle and pedestrian access from Brcl_12 linking through and into Brcl_29.” While we generally support this approach to development across the two land parcels given the relationship between the two sites and the facilities within the wider settlement, LVA currently only has control over Land west of Whimble Road (ref. Brcl_12). Notwithstanding, the proposed masterplan for the site has carefully considered the link between both sites and how they could complement each other. It also includes an indicative suggestion of how Land to east of Town End (re. Brcl_29) could come forward alongside the wider Brcl_12 site, to ensure they dovetail together and the development of Land west of Whimble Road (ref. Brcl_12) does not fetter proposals coming forward on the adjacent Brcl_29 land. LVA is generally supportive of this and would be willing to work with the adjacent landowner to allow for vehicular access for Brcl_29 to be delivered via the LVA site. LVA has a positive track record of working collaboratively with other stakeholders and always seeks to enable the best possible spatial planning solution. Strategic Policy SD07 goes on to state that: Area Brcl_12 – is to accommodate around 100 new homes and 0.6 hectares of employment land. Built form shall be focused on the land to the

north west of Winter Gardens and south of Lake Farm with lower density development forming a frontage onto the road from Burrows Cross within the field to the north west of Winter Gardens. To the north of Brcl_12 there is scope to provide open space and habitat and other open space areas. We support the general provisions of this policy for Land west of Whimble Road, Broadclyst (ref. Brcl_12), including built form being focused on the land to the north west of Winter Gardens and south of Lake Farm, with lower density development forming a frontage onto the road from Burrows Cross within the field to the north west of Winter Gardens, and the provision of open space, habitat and other open space areas to the north of Brcl_12. These are elements that are featured and met through our proposed masterplan for the site. Notwithstanding, as set out and demonstrated in previously representations to the Local Plan, we consider that the site can deliver up to 145 dwellings (including affordable housing and custom-self build plots), while still accommodating the other required and important aspects of the scheme. These include 0.6 hectares of employment land, access from Whimble Road, as well as a community play area. Significant areas of public open space are also included that are well in excess of what would be required by policy and will in effect deliver a large area of publicly accessible parkland for the whole village to enjoy. This has been informed by technical work including highways, ecology, landscape, heritage and drainage work, all of which underpin the masterplan design. Furthermore, Highways Officers have confirmed that the access design is sufficient to accommodate this number of homes and the employment provision. We, therefore, consider that this is the optimal solution for the delivery of housing at Broadclyst that would see a multitude of benefits being realised without harm being caused. We, therefore, respectfully ask for the number of homes to be accommodated on the Brcl_12 site to be increased to 145 dwellings, particularly given the Council is only planning for 80% of the district's overall housing requirement, and this would assist the Council in getting closer to delivering the full requirement now rather than in the future and would assist in providing a degree of contingency should other allocations not come forward or achieve a lower quantum of development.

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 RESPOND, AS REQUIRED, TO ANY QUESTIONS IN RELATION TO POLICY SD07 AND IN PARTICULAR SITE BRCL_12.

Full name: Michelle Bailey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This area, combined with others which were put forward in the Local Plan for development within Broadclyst would see an increase in the housing population by approx. 15%. This is far in excess of the housing needs put forward just a couple of years ago, when the Parish were first putting together their Neighbourhood Plan. I believe at that time there was a request to consider where 30 houses could be sited and after lengthy consultation through the Neighbourhood Plan suitable areas were identified and others discounted. This particular area was strongly opposed by local residents as an area for housing development due to its location and the impact on the local environment. This proposal seems to be at odds with the Neighbourhood Plan by showing very little consideration to the work the Parish has already done with regards to local consultation which has now spanned several years. I would implore EDDC to review this and ensure any proposals are not at odds with this – after all the Neighbourhood Plan is the voice of the village!

If you look at feedback within the previous Local Plan consultation (where many provided their feedback) you will note:

Broadclyst - Increasing boundary by 50% will change character of village Proposed sites in Broadclyst are beyond settlement boundaries The BUA boundary for Broadclyst in the Broadclyst Neighbourhood Development Plan and the adopted EDLP does not include the preferred sites LP_Brcl_09, LP_Brcl_29 and LP_Brcl_12, but the proposed EDLP seems to have redrawn the boundary (now referred to as a Settlement Boundary) to include these sites. There is no justification to this redrawing and it is misleading and intended to deceive so as to provide justification for development on these 3 preferred

sites in accordance with paragraph 3.75 of the proposed EDLP. The original BUA boundary for Broadclyst should be retained when considering development.

Grade 1 Agricultural Land The land in question is Grade 1 agricultural land which by definition should be the most productive type of land for farming and needs to be protected as such. The land is currently used for a mixture of animal grazing and market gardening. By putting this forward as an area for development, are EDDC saying that this is no longer important? This does seem at odds with the EDDC Development Policy which states that such developments are not in the interest of food security into the future. Once sold for housing, it's gone.

Much of the lower lying land in question is prone to flooding and with a high-water table is building on this land really suitable? It is very likely to cause further flooding in the surrounding areas and for nearby properties particularly as parts of the land in question are higher than these properties. Whilst the proposal suggests the site is flat, this is simply not true.

There is a lack of provision for waste water and sewerage in the vicinity and without significant investment the current pumping station which often backs up will not cope with any additional burden. There have been multiple occasions where even with little rainfall South West Water have had to intervene to clear the ditch leading pumping station for several hours at a time. Increasing the levels of sewerage increases the risks associated with releasing nasty phosphates into the surrounding area and will have a direct impact on the River Clyst and its wildlife inhabitants as the villages waste water heads out of the village.

Loss of habitats and wildlife Before any development goes ahead a full and comprehensive review of the habitats and wildlife in the area needs to be done to determine its impact. There are red listed birds, foxes, rabbits, a number of small mammals and insects, protected news (great crested newts are known and reported to be within the pond area within the development area but also in the surrounding properties) as well as bats all living within the fields being put forward for development. The loss of the fields and hedgerows will have a devastating effect on these. There is a pond area within the proposed development site next to this one (not owned by the Winter Gardens land owner or the National Trust) which must be protected, along with their surrounding territory and routes and evidence to demonstrate this is being considered by the developer should be requested.

Some of the fields adjacent to the development are used for farming by others, such as for grazing sheep. The development is likely to have an adverse impact on the ability for these fields to be used for such purposes therefore further impacting local farming. Noise, light pollution as well as an increase in rubbish is a very real concern for the welfare of these animals in these fields.

Adverse impact on the historical setting of Broadclyst Broadclyst as a village is home to a number of listed buildings and has conservation areas (as highlighted in the rejection of other proposed housing calls for land also put forward as part of the Local Plan consultation).

Surrounding the Winter Gardens site itself, there are a number of listed buildings and the curtilage for some of these properties is adjacent to the proposed development. Besides Lake House and College Cottage which were highlighted by EDDC, there is Lake Farm, Markers Cottage, Symes Cottage, Hackworthy Cottage and Heath Gardens all of which have had very strict planning constraints put in place to restrict development to them. It is imperative that the Listed Building Conservation Team are consulted as part of these proposals to ensure the historic nature of these properties are protected. As highlighted previously, some of the proposed site for development, particularly the area near the surrounding properties is much higher up thereby likely to have an adverse impact on their outlook. In the Local Plan feedback it was noted 'Heritage commentary - Site is 20m from a grade II listed building which would need to be considered'.

Besides the listed buildings, many houses within this area of the village are of a more rustic and unique appearance given their age and it is important the development if permitted is sympathetic to this.

The houses within the Maple Road area have many restrictive covenants in place due to them being built on National Trust land. Can the same level of covenants be applied to this development to ensure future proofing against unrestricted changes to the area?

Part of the appeal for residents within this area of the village was the rural / countryside views, low levels of light and noise pollution. This will all disappear and devalue many of the surrounding houses. No more starry nights!

Highways and traffic One of the fundamental concerns is highways and the ability for the local roads to cope with an increase in traffic. A development of this size is likely to see in excess of 350 cars being used on the surrounding roads. Roads that simply can't cope as they are. Given the proposed location this will very likely have a direct impact on the Whimple Road leading towards and through either Station Road (past Clyst Vale) towards Cranbrook, or through Dog Village. Given the daily chaos at school drop off and pick up times this will only get worse. Unless the developers and highways can come up with a better highway's solution then there will likely be further delays for traffic in the area as well as a much-increased risk for residents and local schools' pupil's safety. Added to this there will be an increased level of pollution.

It is with interest that I note on the LVA's consultation that they suggest that the current public footpath could be used as a combined cycle path. This is a nonsense. The public footpath goes into a private track before joining onto Town End - there is no lighting. The track is solely maintained by the residents who live along the track. The track outflows into Town End where if you turn left you head into the built up hedge, single track lane without any lighting. If you turn right, there is a single track and a light several metres down the road before there are no further lights. There are no adequate footpaths. This is a dangerous proposal and needs to be challenged. Using Town End for people or bikes should not even be considered or encouraged. Increased footfall is of real concern for the pond area which will pose a significant threat to the great crested newts and other wildlife.

Parking and traffic congestion pinch points There will be an increase in demand for parking in the village as the Winter Gardens development's location is likely to see residents driving into the village to either access the local services or the primary or secondary school due to the lack of pathways from the area and on the surrounding roads. There are currently many residents living within the village boundary driving to the primary and secondary school for school drop off and pick up because of the lack of pathways or where they have very young children or need to get off to work or off to after school activities promptly. The current parking most days is very dangerous, causes delays and much stress to parents who use the narrower areas of Town Hill and Town End as a cut through to avoid the congestion around Dog Village. This is likely to mean more parents will be forced into Dog Village.

Increased demand and lack of transport links The local buses are struggling to cope with current demand where buses are irregular and over full at peak times, the burden on this service is likely to increase. How will these issues be mitigated? The bus stops are currently along the main B3181 which are a reasonable walk from the proposed site but again without better pathways to facilitate access to these this may prevent people from using them. There are no alternative transport links e.g. railway within easy walking distance of the site. People will therefore be largely forced to drive to neighbouring villages to access these links.

Resident and Pupil Safety Whilst alluded to above, the Winter Gardens development location, poses a real challenge in terms of road safety for pedestrians as there is a lack of pathways along the Whimble Road, along Woodbury View and Town End. Town End is currently accessed via a narrow single track lane with high hedging so without removing this there is no room for pathways. Along Town End most houses front onto the roadway and there is a lack of space to incorporate pathways without narrowing the road even further. Given the current issues with parking along the road, pedestrians are already at high risk walking along this road due to its narrowness and the number of school parents parking along it for drop off and pick up. Woodbury View and Whimble Road face similar challenges with on road parking from residents and a lack of pathways. At present, emergency services or delivery lorries struggle to access properties at peak traffic times.

There are significant challenges within close vicinity of the Clyst Vale Community College and Broadclyst Community Primary School due to the current levels of traffic and lack of pathways; this development would only add to that. It is worth noting much of this area is not covered with street lighting at present particularly along the Whimble Road and Town End, so provision needs to be made for this.

The likely increase in traffic and lack of adequate and safe cycle paths is a cause for concern. Unless some assurances can be made to improve the provision within the area there is a real risk of an accident happening and we are likely to see the use of bikes reducing.

The surrounding area sees a number of livery yards so again there will be an increased risk to local horse riders accessing local roads to exercise their animals.

After much resident debate, the exercising of dogs on the village playing field has been banned, with dog walkers being encouraged to access wider areas surrounding the village. Many therefore walk away from the village centre to access one of the designated walking areas by crossing the Whimble Road onto an unpathed roadway (Elbury Lane). There is a local bike park within this area too; therefore increasing traffic in this area will further endanger any young people who wish to use it. There is currently a public footpath which runs through the proposed site and needs to be retained. The proposal to use the adjacent field for recreation purposes is of significant concerns given the terrestrial habits of the great crested newts present on the site.

Demand for local services Both the current Primary and Secondary schools are at capacity. The Primary school is oversubscribed and with its Outstanding Ofsted rating this is likely to continue. This is likely to mean that new residents to the area are likely to be unable to obtain places immediately in either school and will be forced to access other schools in the surrounding area thereby increasing traffic leaving the village and burdening outlying schools.

In the Local Plan feedback DCC Education confirmed: 'Broadclyst Primary School is very popular and fills up with out of area children. Development within Broadclyst would mean that there would be a push back to other schools. The current primary school could not support the level of development proposed -36.8 ha, and could not be extended further. Additional new secondary provision required to support any development'

The Broadclyst doctors' surgery is overfull and is currently being forced to take patients from both Whimble and Cranbrook due to the lack of services in those locations. Unless something is done to improve the situation within those areas, this situation will only get worse. There is no scope to extend the current surgery building.

Whilst there are some youth services in the village, there have been some challenges in Broadclyst with regards to youth behaviour and vandalism perhaps in part driven by the lack of youth services. The local sports centre post Covid is certainly not back to its pre Covid offer of activities and is running without a receptionist. What investment will be developer provide to improve these services to help keep our young people engaged? A playpark and a field which have been suggested by the LVA is not sufficient.

What provisions and support will the developers provide to support an increased need for elderly residents? Will any of the housing being proposed be suitable for the elderly? Currently much of the work done locally to support the elderly through Clyst Caring is managed by volunteers which are often hard to recruit. As above, the lack of pathways from this area will pose a real challenge to any new elderly residents accessing the centre of the village where this centre is managed.

The village currently has a small provision of amenities such as a local shop with post office, hairdresser, takeaway, charity shop and social club, however, whilst on paper this sounds attractive and sufficient to support more housing, the reality is that these can be hard to access as parking currently for any is at a premium. Often the village car park is overfull, resulting in the surrounding roads being parked in hindering access for residents to their homes or places such as the doctors' surgery being inaccessible.

Whilst the proposal may have bring benefits in terms of increased footfall to the New Inn public house adjacent to the site; it is likely to inhibit their ability to put on 'noisier' events particularly of an evening which many current residents enjoy without upsetting and getting complaints from residents in the area. One of the appeals of this pub currently is its rural location and that it is slightly more 'countrified'. When larger events are put on, parking becomes a challenge and people park on the Whimple Road. With an estate being built opposite, this problem, will quickly become the their problem and cars will inevitably park within this new estate. I understand the public house do not support this development.

Housing density and green spaces The proposed development seems very ambitious in terms of its scale and the density of housing proposed when added to the neighbouring proposal (site 12). Looking at developments in outlying villages and towns, many now face significant challenges due to being crammed in and the lack of provision made for simple things such as parking. How will EDDC satisfy themselves that this is being considered?

There is one central play park for the village which can only be accessed by limited pathways from this proposed area. It would be prudent to ensure sufficient green spaces / play areas are developed within the site.

In summary Fundamentally, without significant investment in the area surrounding the proposed site, it is not suitable for development. If it goes ahead, who will pay for these improvements? What guarantees will there be to ensure this happens knowing how it has failed in other developments locally? Will allowing this development set a precedent for further development in the village in the future?

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.: Removal of the sites in entirety would be the best outcome; failing that a significant reduction in the number of houses being proposed for the area and significantly greater recognition that habitats will need to be protected with substantive mitigation put in place to protect the protected species within the site e.g great crested newts. Additional protection of the historic landscape with consultation through the Conservation team ensuring that any development is in keeping with the surrounding area and recognition any development should not be to the detriment of Lake House or Lake Farm which are within 20m of the proposed development. Recognition and mitigation of the significant burden the development will have on the surrounding infrastructure and services which will not cope with the volume of house being proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Julie Chance

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The following material considerations apply: Impact on Amenity - Noise from construction and traffic whilst constructing. Noise from occupation and traffic would impact on the environment and the right to enjoy the habitat. 100+ dwellings would lead to many more occupants with the ownership of vehicles. Environmental Considerations - the construct and habitation from the development would lead to a loss of biodiversity and should be surveyed by an appropriate body. The area is situated within a flood risk. An appropriate survey should be carried out. At the parish council meeting it was advised that properties in this area could not get adequate insurance. This would disadvantage inhabitants. The construct would lead to greater flooding. The air and water quality should be appropriately surveyed as the increased burden could contaminate the water quality, such as sewage. The air quality would suffer with the increased traffic during construct and habitation. The biodiversity would suffer in regards to the songbird population and wildlife that has had the benefit of using this land and the loss of there habitation. Increased traffic from sewage demand. Highway Safety and Transport - the road access would lead to safety concerns in that the road to Whimple would need considerable upgrade with speed monitoring. There are no footpaths on this road. Increased risk of heavy lorries being on the roads during construct and for sewage plant.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site is not fit for for purpose. It

needs a Flood risk assessment and and environmental impact assessment including air quality.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It appears not to be sound as there hasn't been the necessary checks and balances for this site. The parish council do not seem to be listening to the parish. The recent parish council meeting suggested that we had no choice but to accept this development was happening.

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.: Full assessment in respect of flooding, air and environmental impact. Impact on Infrastructure. Impact on schools, surgeries, and quality of life.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The councillors at the recent 13 March 2025 public consultation meeting seemed to start from a position of bias, claiming that the development was 90% going to happen. The meeting minutes are not yet available but the chairman appeared unwilling to capture and/or feedback legitimate material considerations back to EDDC. 1 councillor has a conflict of interest owning land which they would benefit from planning permission in this locale. 1 councillor was concerned with social equity should the build go ahead but seemed to suggest that there was no inclusion

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Alan Drake

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: These development areas were investigated as part of the 'Neighbourhood Plan' And were overwhelmingly rejected.

This development will destroy the habitat for the protected Great Crested Newt population of the pond at the centre of the site.

This development will destroy yet more 'Grade 1' agricultural land, reducing the countries food security.

Developing this elevated, flood prone site, will cause flooding and problems in the surrounding lower lying population areas.

This development will be directly in-front of the historic Grade 2 listed 'Lake House'. Views of and from this important village landmark, will be obscured by development on the proposed site due to its elevation with respect to Lake House.

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.: Prioritise development on 'Brown Field' sites NOT Grade 1 Agricultural land.

Protect the Great Crested Newt population by NOT building near it.

Do not develop flood prone sites as developments of this type cause flooding issues in other areas not previously affected. This site has a VERY high winter water table.

Any developments should not have a detrimental effect on the existing historic character of the village.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The Broadclyst population have been asked to comment / provide feedback over and over again regarding this unwanted large scale development.

The entire consultation has been designed to put off people from commenting by ignoring all their previous comments and asking them to provide feedback time and time again.

All the comments from the MANY previous consultations MUST be looked at and included in this and any future requests for 'feedback' on this proposal.

The 'Legal' type wording of this feedback form is again designed to be off-putting to the majority of the residents of Broadclyst. This results in a skewed view of residents true opinions.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: James Gaisford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I have wish to bring to you attention Material Considerations in respect of the draft policy on Strategic Policy SD07: Development allocations at Broadclyst.

And in particular, my comments relate to Land west of Whimple Road, Broadclyst (Brcl_12) combined with Land to east of Town End, Broadclyst (Brcl_29).

Infrastructure and Services

The current sewage arrangements do not cater for the village at the moment. In the period Floodmapper has records for, 2021-2023, raw sewage has been discharged in, or near (~3mi.), Broadclyst 178 time(s) and into the River Clyst. In addition the pumping station near Lowdens in the village spills multiple times a year. The proposed development would need to provide a solution to upgrade the capacity.

The GP Surgery is currently full and it has taken me two weeks to obtain an appointment. The proposed development would need to address how the extra residents would have access to healthcare.

The Junior school is also full and is unable to absorb any new Pupils

Environmental Considerations

The water table in the land under proposed development is very high and in the winter there is lying water on the ground. The proposed development would need to address where this water goes to.

Highway safety and transport.

There is a traffic logjam every day at the school and a pinch point on Station Road where it meets Slaparse lane. The road here is a single car wide and you have all the schoolchildren leaving Cyst Vale Community College. The development will need to take into account the increased traffic in this area and the safety of the children.

Full name: Lorna Mason

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: see pdf file

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: see pdf file

Full name: Lorna Mason

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3(b). If no, please give details 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 methodology for identifying and selected housing development sites at Broadclyst has caused real concern and worry for residents. There were 370 unhappy or dissatisfied comments in the initial consultation process regarding site LP Brcl 12 and 246 for LP Brcl 29. For context, for LP Brcl 12 this was five times the number of objections than the next most unpopular site (Whimble 11). LP Brcl 12 had twice the number of objections than even the proposed new town near Clyst Honiton. Despite this, the initial report following the ‘sifting of sites’ process by EDDC, following the public consultation, stated that had been enthusiasm from council officers for development at these sites, and not a single mention that so many objections had been raised by members of the public. EDDC has since faced public criticism for holding closed doors meetings when making their initial site selections. I criticised this part of the process in one of their public meetings and was subsequently berated by the chair of the council. Councillor Rylance told me immediately after my representation that what I had said was “not cool”. We have since complained about her completely unprofessional behaviour. Residents continue to feel that the initial part of the process was lacking in transparency. How can so many people raise concerns and yet officers of the council can be “enthusiastic” about development about these very same sites? Was the public consultation simply a box ticking exercise for EDDC we wondered? We felt that we were being deliberately ignored. Plans to build almost 124 homes on the combined sites at LP_Brcl_29 and LP_Brcl_12 represents significant over-development of the village. We feel that without substantial mitigation, which might not actually be possible in many instances, these sites cannot contribute to sustainability. Inadequate pavements, high quality agricultural land, heritage concerns, single track roads, insufficient highway capacity, oversubscribed doctors and schools, flooding- all of these concerns have been raised about the sites in Broadclyst, and these very same factors were cited as reasons for EDDC rejecting development at other sites. This made no sense to residents in Broadclyst. The initial EDDC summary assessment made no mention of overhead

power lines, or the existing severe traffic bottle necks at either end of our village onto the B3181, waterlogged roads in winter that are impassable or a GP surgery that cannot expand its current premises. I have witnessed raw sewage overspill onto the fields at Heath cross pumping station which is adjacent to these sites. I have photographic evidence of this. I also understand that there is no plan to upgrade the existing Victorian sewage infrastructure. When I questioned one of the engineers from Southwest water about the prospect of 124 new houses, when he was dealing with the latest one, his comment to me was “The pipes will never cope – it would need a serious amount of new infrastructure.” Residents in Town End in Broadclyst have seen flash floods in recent years, and this too is adjacent to Broadclyst 29. I have video footage of surface water gushing into our property and flooding it. This is a huge concern for us if development at this scale goes ahead. We recognise that Broadclyst is a particularly attractive village when considering housing development but we still dispute that the scale of what is being proposed meets The National Planning Framework requirement for delivering sustainable development.

The below supporting text, together with images, provides evidence of the severe congestion regarding traffic and lack of footpaths. In our opinion, the volume of traffic generated by the sites cannot be accommodated on the local highway network without detriment to road safety. There are two access points from the B3181 into Broadclyst village. To the west of the village, it is single track country lanes which access the village, and the latter is the proposed sites for development. In our opinion, there is no sustainable access because there are no formal footpaths. Maintaining Supply and Delivery Broadclyst is also on the edge of the electricity supply network for the area. With the new planning laws requiring low carbon heating and provision of EV charging, the required electricity demand for a development of this size is unlikely to be readily available in such a rural location and the distribution network would need significant reinforcement to be able to meet the needs of the development. There are also overhead power cables in the Southern section of LP_Brcl_12. Supporting a prosperous rural economy Broadclyst itself is surrounded by country roads, many of which are single track in places and often waterlogged or impassable in Winter. We think it is essential that pedestrian access to both schools is significantly improved although we are worried that in some places, there is no room for pavements. At present there is a lack of pavements connecting LP_Brcl_29 and LP_Brcl_12 to both of the schools and the bus stop, and similarly there is insufficient pedestrian access connecting LP_Brcl_09 to Clyst Vale College and the bus stop. Unless people feel safe walking to school or to catch the bus, it's far more likely that they will drive. This is currently what is happening already with many of the children who attend the schools, even when parents live within the village itself. In the most recent edition of our Parish magazine, there was an article about PC Tim Walsh's visit to Town Hill to observe traffic around the Primary school and

understand the challenges presented by “a very busy primary school run”. It also states that he has written a report outlining his concerns to DCC’s Highways Department and asking for a site meeting. School collection times result in congestion because the local roads were never designed to cope with current traffic volumes. Again, some of the roads going towards the schools are single track, for example the country lane between Town End leading to Burrow Road. The existing lanes often flood in Winter and many are very badly rutted. Adding more cars will make this situation much worse and will not contribute to building a more sustainable community. Improvements to the roads to help cyclists must happen if development is to be sustainable. There are no cycle lanes in the village itself to the main commuter routes to Exeter, and no cycle lane provision on Station Road whatsoever. As mentioned, many of the current lanes are single track, so there is already a conflict between cyclists and cars. There is a joint cycle lane/pedestrian pavement on the B3181 between Broadclyst and Exeter but it is poorly maintained and often so overgrown it forces cyclists onto the main road whenever they encounter branches or people walking.

Sustainable Development in Rural Areas One of the biggest concerns of residents is that increasing the size of the village will put intolerable pressure on already struggling local services. We feel that development on this scale, far from enhancing the vitality of our community, is likely to be detrimental. Without remedial action, a swell in population will be especially difficult for the local primary and secondary schools, and the GP surgery. We believe it’s critical to engage both schools in discussion around their capacity issues and have a plan for where the extra children will go prior to approving the proposed development sites. What assurances can we be given that the local surgery will receive the funding it needs to accommodate all the extra patients in Broadclyst village and that developers will engage appropriately with what needs to be delivered? **Flood risk** Many residents are concerned that part of site LP_Brcl_12 is in a flood risk zone. During periods of very heavy rain, water saturates these fields making them particularly boggy underfoot. In line with sections 159 and 160 of The National Planning Policy Framework we would like to see an assessment of whether the run-off from surface water, if this site were developed, could potentially increase flood risk of neighbouring properties in Town End and on roads leading up to Burrow Farm. These properties are already prone to flooding and residents are worried that development at this site will make their situation worse. In Autumn 2023 a flash flood caused the length of Town End to be flooded with water entering properties. Development adjacent to this road is bound to make this phenomenon more common in future. **Achieving well-designed places** Broadclyst is a beautiful village, surrounded by National Trust Land. We are concerned that development on this scale could be detrimental to the intrinsic character of the village, particularly the historic Eastern side of Broadclyst, abutting the proposed sites. This part of the village has many listed and thatched buildings. In

particular, with reference to site LP_Brcl_29, any development here would have a direct impact on Lake House which is Grade 2 Listed. The land proposed is also on an elevation that could dominate the surrounding environment. If development is allowed to go ahead, we suggest it must be in keeping with the historic setting and adhere strictly to the design codes set out in The Parish Neighbourhood Plan. Habitats and Biodiversity In line with National Planning Policy Statement 180, we believe that any residential development in the countryside often has a harmful impact on biodiversity. Residents are concerned that development at sites LP_Brcl_29 and LP_Brcl_12 would be on grade 1 agricultural land. Also on sites LP_Brcl_29 and LP_Brcl_12 there are a number of red and amber listed bird species, some specific to farmland habitat such as skylark and linnet. Bats also use the hedgerows to navigate and the dark skies as cover from predators. Any development at these sites will be detrimental to these species by removing specific habitat, removing their navigation method and increasing the ambient light.

There is a pond on site LP_Brcl_12, the loss of which would be detrimental to wildlife. We would like to see this feature maintained. One of the nearby cottages is a designated site for Great Crested Newts. In the Cylst Vale Regional Park consultation document there was specific mention of the Winter Gardens site (LP_Brcl_12) as being an important habitat for invertebrates. We therefore would like to see a full environmental and biodiversity impact assessment, commissioned prior to development being agreed, and a proper plan for mitigation if development is allowed to go ahead. There are a number of significant habitats near the proposed sites including Ashclyst Forest and Elbury Farm, the first is nationally important for butterflies and the second for rare fungi and Barn Owls. We also feel that given the numbers of bats that have been seen in the Town End area, a survey focussing on this species in particular would be beneficial. In 2023, Land Vale Alliance instructed Grassroots Planning (a private consultancy firm) to provide an opinion on whether an "Environmental Impact Assessment" was necessary ahead of LP_Brcl_12 going to the planning application stage. They came to the conclusion that no such assessment was necessary. We wonder how such an opinion can ever be considered to be unbiased, when its the company that stands to cash in, instructing and paying the fee for another firm to conduct such an assessment? They made the following points which we completely disagree with;

- no highway safety issues
- sufficient capacity to accommodate extra traffic
- good provision of walking and cycling routes to and from the site to public transport and schools (not unless they are prepared to put in a pavement and cycle lane

the length of Whimble Road and also acknowledge the local schools are both way over their capacity)

- no anticipated issues with regard to flood risk
- no significant environmental impact on landscape and visual resources Thy went on to comment that "The existing facilities within Broadclyst may experience some increase in usage but this is unlikely to be significant given the scale of the development...and is likely to benefit the local economy through increased use of existing services". They don't live here. We do. We cannot understand how any such statement could be made and they have clearly not consulted with residents about the existing pressures on services and infrastructure .

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: see pdf file

Full name: Simon Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

When my wife and I first moved to the village five years ago, one of the first things we did was attend the village fete and thought it was brilliant that the Broadclyst Neighbourhood Plan was on display and we had a democratic say on the plan. It is my opinion that East Devon District Council (EDDC) has failed in the duty to respect the Broadclyst Neighbourhood Plan, particularly in relation to housing allocations.

The Parish has already met its housing commitments through significant development at Tithebarn and West Clyst, as outlined in our Neighbourhood Plan, which was designed to reflect the needs and wishes of the community. Despite this, EDDC has proceeded to allocate an additional 100 houses at Wintergardens, contrary to the principles of localism and in disregard of the carefully considered planning framework established by our Neighbourhood Plan.

This action is flawed for the following reasons:

- **Community Planning Efforts:** The Neighbourhood Plan represents the voice of our community and should be a key document in local planning decisions.
- **Sustainable Development:** The Parish cannot sustainably support additional housing developments without overwhelming local infrastructure and amenities. Pinhoe and Broadclyst surgery cannot cope with the current significant increase in patient list size. Broadclyst is at capacity and cannot cope with this further increase.

- **Overloading Parish Infrastructure:** The decision to allocate 100 additional houses at Wintergardens places undue strain on local infrastructure, schools, healthcare services, and roads.
- **Undermines Public Trust:** The allocation disregards community consultation and compromises the trust between Broadclyst Parish Council, its residents, and EDDC.
- **Neglects Community Engagement:** The community's concerns and the Parish Council's objections have been ignored, eroding public trust in the planning process.
- **Failed to Respect the Broadclyst Neighbourhood Plan:** EDDC has disregarded the established housing allocations for Broadclyst Parish, undermining the local democratic process.
- **Contains misleading statements:** I think that your statement that "some support for the site to be allocated is evident" is completely misleading. You make no reference to EDDC public consultation process on this site, where over 300 people said they were dissatisfied or unhappy about development here. Please know that this plan is hugely contentious and unpopular amongst local residents.
- **Flawed rationale:**
 - o It seems only EDDC strategic planning committee, the owner of the land and LVA are in support of this development, the former to meet housing targets and the latter to make money.
 - o EDDC officers originally recommended 70 dwellings at Broadclyst 12a, as anything bigger would be "detrimental" to the village more generally. Any further development in Broadclyst will put an unsustainable strain on roads, services and schools. There isn't anyone in the village who would dispute this.
 - o Parish housing needs have been met several times over in the past decade with developments at Cranbrook, Tithebarn and Westcyst. Therefore these houses are superfluous to requirements, and it is purely for profit.
- **Bio-diversity impact:** how can building 140+ homes on green fields, result in a 10% increase in bio-diversity? Building houses here will adversely affect the local bat population which use this area. It will also affect the rookery that is opposite this site. This is a farmland area with bio-diversity, that needs to remain as it is. You can significantly increase the bio-diversity by taking positive action on the current site, as it exists, without adding unnecessary buildings to the site.
- **Increased flood risk:** Flooding is a major concern of residents living adjacent to the proposed site. These fields are frequently saturated, and often flooded, during the autumn and winter period. The fear is that adding more concrete and tarmac to the area will only increase the risk of flooding on the site and to the local community if this plan is approved.

- Increased risk of serious injury: adding more traffic to the Whimble Road, without sufficient walkways has the potential to significantly increase the risk of accident or injury to people who have to walk the lane.
- Covenants: There are local covenants on what residents can and cannot do to their properties, and need to seek permission when they do make certain changes to maintain the integrity of the village. Building these houses do not maintain this integrity and will have a significant detrimental impact.

For these reason's East Devon District Council should immediately reverse the allocation of 100+ houses at Wintergardens, and recommit to honouring the democratic process with the Broadclyst Neighbourhood Plan in all future planning decisions.

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.: When my wife and I first moved to the village five years ago, one of the first things we did was attend the village fete and thought it was brilliant that the Broadclyst Neighbourhood Plan was on display and we had a democratic say on the plan. It is my opinion that East Devon District Council (EDDC) has failed in the duty to respect the Broadclyst Neighbourhood Plan, particularly in relation to housing allocations.

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This action is flawed for the following reasons:

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- **Sustainable Development:** The Parish cannot sustainably support additional housing developments without overwhelming local infrastructure and amenities. Pinhoe and Broadclyst surgery cannot cope with the current significant increase in patient list size. Broadclyst is at capacity and cannot cope with this further increase.
- **Overloading Parish Infrastructure:** The decision to allocate 100 additional houses at Wintergardens places undue strain on local infrastructure, schools, healthcare services, and roads.
- **Undermines Public Trust:** The allocation disregards community consultation and compromises the trust between Broadclyst Parish Council, its residents, and EDDC.
- **Neglects Community Engagement:** The community's concerns and the Parish Council's objections have been ignored, eroding public trust in the planning process.
- **Failed to Respect the Broadclyst Neighbourhood Plan:** EDDC has disregarded the established housing allocations for Broadclyst Parish, undermining the local democratic process.
- **Contains misleading statements:** I think that your statement that "some support for the site to be allocated is evident" is completely misleading. You make no reference to EDDC public consultation process on this site, where over 300 people said they were dissatisfied or unhappy about development here. Please know that this plan is hugely contentious and unpopular amongst local residents.
- **Flawed rationale:**
 - o It seems only EDDC strategic planning committee, the owner of the land and LVA are in support of this development, the former to meet housing targets and the latter to make money.
 - o EDDC officers originally recommended 70 dwellings at Broadclyst 12a, as anything bigger would be "detrimental" to the village more generally. Any further development in Broadclyst will put an unsustainable strain on roads, services and schools. There isn't anyone in the village who would dispute this.
 - o Parish housing needs have been met several times over in the past decade with developments at Cranbrook, Tithebarn and Westcyst. Therefore these houses are superfluous to requirements, and it is purely for profit.
- **Bio-diversity impact:** how can building 140+ homes on green fields, result in a 10% increase in bio-diversity? Building houses here will adversely affect the local bat population which use this area. It will also affect the rookery that is opposite this site. This is a farmland area with bio-diversity, that needs to remain as it is. You can

significantly increase the bio-diversity by taking positive action on the current site, as it exists, without adding unnecessary buildings to the site.

- **Increased flood risk:** Flooding is a major concern of residents living adjacent to the proposed site. These fields are frequently saturated, and often flooded, during the autumn and winter period. The fear is that adding more concrete and tarmac to the area will only increase the risk of flooding on the site and to the local community if this plan is approved.
- **Increased risk of serious injury:** adding more traffic to the Whimble Road, without sufficient walkways has the potential to significantly increase the risk of accident or injury to people who have to walk the lane.
- **Covenants:** There are local covenants on what residents can and cannot do to their properties, and need to seek permission when they do make certain changes to maintain the integrity of the village. Building these houses do not maintain this integrity and will have a significant detrimental impact. For these reasons East Devon District Council should immediately reverse the allocation of 100+ houses at Wintergardens, and recommit to honouring the democratic process with the Broadclyst Neighbourhood Plan in all future planning decisions.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This action is flawed for the following reasons:

- **Community Planning Efforts:** The Neighbourhood Plan represents the voice of our community and should be a key document in local planning decisions.
- **Sustainable Development:** The Parish cannot sustainably support additional housing developments without overwhelming local infrastructure and amenities. Pinhoe and Broadclyst surgery cannot cope with the current significant increase in patient list size. Broadclyst is at capacity and cannot cope with this further increase.

- **Overloading Parish Infrastructure:** The decision to allocate 100 additional houses at Wintergardens places undue strain on local infrastructure, schools, healthcare services, and roads.
- **Undermines Public Trust:** The allocation disregards community consultation and compromises the trust between Broadclyst Parish Council, its residents, and EDDC.
- **Neglects Community Engagement:** The community's concerns and the Parish Council's objections have been ignored, eroding public trust in the planning process.
- **Failed to Respect the Broadclyst Neighbourhood Plan:** EDDC has disregarded the established housing allocations for Broadclyst Parish, undermining the local democratic process.
- **Contains misleading statements:** I think that your statement that "some support for the site to be allocated is evident" is completely misleading. You make no reference to EDDC public consultation process on this site, where over 300 people said they were dissatisfied or unhappy about development here. Please know that this plan is hugely contentious and unpopular amongst local residents.
- **Flawed rationale:**
 - o It seems only EDDC strategic planning committee, the owner of the land and LVA are in support of this development, the former to meet housing targets and the latter to make money.
 - o EDDC officers originally recommended 70 dwellings at Broadclyst 12a, as anything bigger would be "detrimental" to the village more generally. Any further development in Broadclyst will put an unsustainable strain on roads, services and schools. There isn't anyone in the village who would dispute this.
 - o Parish housing needs have been met several times over in the past decade with developments at Cranbrook, Tithebarn and Westcyst. Therefore these houses are superfluous to requirements, and it is purely for profit.
- **Bio-diversity impact:** how can building 140+ homes on green fields, result in a 10% increase in bio-diversity? Building houses here will adversely affect the local bat population which use this area. It will also affect the rookery that is opposite this site. This is a farmland area with bio-diversity, that needs to remain as it is. You can significantly increase the bio-diversity by taking positive action on the current site, as it exists, without adding unnecessary buildings to the site.
- **Increased flood risk:** Flooding is a major concern of residents living adjacent to the proposed site. These fields are frequently saturated, and often flooded, during the autumn and winter period. The fear is that adding more concrete and tarmac to the area will only increase the risk of flooding on the site and to the local community if this plan is approved.

- Increased risk of serious injury: adding more traffic to the Whimble Road, without sufficient walkways has the potential to significantly increase the risk of accident or injury to people who have to walk the lane.
- Covenants: There are local covenants on what residents can and cannot do to their properties, and need to seek permission when they do make certain changes to maintain the integrity of the village. Building these houses do not maintain this integrity and will have a significant detrimental impact.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lucy Neal

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Too many homes for the size of village: Broadclyst should not be considered a Tier 3 settlement.

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.: Broadclyst should not be considered a Tier 3 settlement.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Broadclyst cannot support a development of this size. Key issues: * Doctors surgery cannot cope with any additional patients as it is already at capacity. * Primary school is oversubscribed and cannot take additional students. Any children from this development will either have to travel further afield, or it will push other children from nearby areas into other schools which also do not have space. * Access routes to this development are along small roads. In particular the access to here from the A30 would be via a very small back lane to Cranbrook which is not well maintained, has a significant number of potholes and very few passing places. * This land often floods or is waterlogged over winter * The sewage system cannot fully cope with existing housing without adding additional. * There are no footpaths from here to either primary, or

secondary schools. The route to the secondary school in particular is alongside a dangerous road which is unlit.

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.:

Broadclyst cannot support a development of this size. Key issues: * Doctors surgery cannot cope with any additional patients as it is already at capacity. * Primary school is oversubscribed and cannot take additional students. Any children from this development will either have to travel further afield, or it will push other children from nearby areas into other schools which also do not have space. * Access routes to this development are along small roads. In particular the access to here from the A30 would be via a very small back lane to Cranbrook which is not well maintained, has a significant number of potholes and very few passing places. * This land often floods or is waterlogged over winter * The sewage system cannot fully cope with existing housing without adding additional. * There are no footpaths from here to either primary, or secondary schools. The route to the secondary school in particular is alongside a dangerous road which is unlit.

This should be modified to reduce the allowed total number of housing to enable the village to support the new number of housing and at a lower density.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Broadclyst cannot support a development of this size. Key issues: * Doctors surgery cannot cope with any additional patients as it is already at capacity. * Primary school is oversubscribed and cannot take additional students. Any children from this development will either have to travel further afield, or it will push other children from nearby areas into other schools which also do not have space. * Access routes to this development are along small roads. In particular the access to here from the A30 would be via a very small back lane to Cranbrook which is not well maintained, has a significant number of potholes and very few passing places. * This land often floods or is waterlogged over winter * The sewage system cannot fully cope with existing housing without adding additional. * There are no footpaths from here to either primary, or secondary schools. The route to the secondary school in particular is alongside a dangerous road which is unlit.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mark Phillips

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic Policy 07 is unsound for the following reasons. It ignores the Neighbourhood Plan, agreed by a majority (88%) of Broadclyst residents. The Neighbourhood Plan included new housing development commensurate with the size of the village, but SD07 goes way beyond this and is not appropriate for a village the size of Broadclyst. Although it has been suggested that Broadclyst must take some development, Broadclyst has already had huge development, specifically the settlements of West Clyst and Tithebarn, creating new centres of population. SD07 proposes further development alongside the main part of the village that would increase its size by about a third. EDDC stated that development above 70 homes would be “detrimental,” yet the current plan is for twice this number.

There are major traffic concerns. Development of this scale will bring a large number of cars, which the roads cannot cope with. The main route for Exeter or northward on the B3181 goes past Clyst Vale Community College, where there is a bottleneck. There is a section of road with no pavement which students have to walk along on their way to school, already it is dangerous and with increased traffic it will be more so, particularly at peak school/commuting times. The main route to London Road (for the Science Park, Exeter Airport, Honiton and M5) is Station Road; this is already crowded, with bottlenecks at Clyst Vale Community College and the bridge at Broadclyst Station, made worse by buses and the large number of haulage lorries. The route to Cranbrook is Crannaford Lane, which is narrow and mostly only a single lane, yet is already busy with large numbers of cars going between Broadclyst and Cranbrook, often at high speed. All access roads to the proposed site are thus stretched beyond capacity, and cannot take an increase in the number of cars. Also, the entrance to the site would be from Whimble Road, which is narrow and cannot, in its present state, accommodate large construction vehicles turning in.

The SD07 site already suffers significant flooding, and development will exacerbate this problem. The problem of flooding in this area has been getting worse every year, and given the climate crisis, this trend may be expected to accelerate. Even if measures are taken to protect the site itself from flooding, it is likely that surrounding areas, particularly Town End, will be affected.

The village infrastructure cannot cope with development on this scale. The doctor's surgery is overbooked - it is extremely difficult to get an appointment with a doctor in the village, and there is no space for enlargement of the present facility. The primary school is full. Sewage is a major concern. There have been frequent leakages from the pumping station near Winter Gardens, and when there is flooding in winter it is common to see tanker lorries lined up to take away the sewage that threatens to overwhelm the sewerage system. The sewerage cannot cope as it is - more housing at this site would be completely unsustainable. It should also be pointed out that leakage will eventually find its way into the local watercourses; recent citizen science initiatives studying the River Clyst and the Crannybrook have shown high levels of phosphates (data from Westcountry Rivers Trust), and it is reasonable to assume that leaking sewage is at least partially to blame.

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.: Modifications that would go some way to making the plan sound are:

Measures to address the traffic concerns, including but not limited to traffic calming measures on Whimble Road and Crannaford Lane, increased passing spaces on Crannaford Lane, a pavement on the stretch of Whimble Road by Clyst Vale Community College for children walking to school, a wide splay at the entrance to the site on Whimble Road to allow construction vehicles to enter safely.

Flood prevention measures, particularly to ensure that there is no effect on existing dwellings.

The sewerage must be upgraded to cope with the extra development. The sewerage is insufficient at present, and any new development must include a plan for an upgrade that will guarantee that the sewerage will be able to cope with the scale of the development.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Clare Ratcliffe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to object to the possible planning permission which will be sort by LVA for farmland on the East side of the village of Broadclyst. The Neighbourhood Plan, which cost a lot of money to prepare, did not include Winter Gardens as suitable for residential building so was not earmarked for residential building by Broadclyst Parish Council but it has been Identified by speculators (LVA) who have little interest in local needs but more of how much money they can make. There are better places to build and have been built in Broadclyst Parish which have been more than enough for the quota that EDDC wants. The area and number of houses proposed would be detrimental to the village of Broadclyst which is already struggling to cope with sewerage, flooding, traffic, schooling and healthcare. The land at Winter Gardens is productive farmland and is home to healthy biodiversity and if so many houses and ancillary buildings are built on it for car dependant people these things will be lost.

1. Sewerage; I have experienced lorries pumping sewerage out several times. Several villagers have had problems with sewerage backing up into their properties.

2. Flooding; There have been floods around Winter Gardens making adjacent roads impassable and on the land making the footpath difficult to negotiate. Also there is flooding every time it rains in Green Tree Lane making insurance difficult for some houses there. As I write there is standing water on a nearby road even though it has not rained for some time. 3. Roads; Planners don't know how many walkers (dog walkers and school children) and mobility scooters use the road between Woodland Road and Elbury Cross. More housing will make it even more busy and precarious than it is now even though there is a 30 mph speed limit. Already there is a big problem, particularly during term time, at the road junction onto Station Road by the secondary school and

between there and the B Exeter/Cullompton road where it is very narrow which will be even worse when the building for 15 houses is completed on Whimple Road
23/1537/MOUT

4. Schools and healthcare.; Both the primary and secondary schools are full and there is no room for expansion. It is difficult to get an appointment with a doctor and no room for expansion nor money for more doctors and healthcare staff.

God save our farmland remembering that it will be more and more difficult to grow food if we covered it with concrete and tarmac. Please don't let our village be ruined.

Full name: Melanie Schwarzin

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To whom it may concern

I write to you today as a very concerned resident of Broadclyst Village. I have been living in the village since 2011 and i am extremely worried about the pending development at the Winter Gardens .

The village is situated in a very small historic location and I am horrified that this location has been put forward for potential development.

And here are my reasons....

The whole site and surrounding area is susceptible to immense flooding which already causes many problems and angst to the residents of the village trying to navigate their day today living. (please see photographic evidence provided)

The number of houses proposed will be extremely detrimental to an over stretch infrastructure . The Doctors surgery is not able to cope with the amount of people in the village already (some of the residents are very elderly are heavily reliant on this service and struggle to get an appointment) The schools are full and residents are having to send their children else where outside the village .

The situation of the proposed site is surrounded by small country lanes with no pavements which is already extremely hazardous for the residents to navigate especially small children walking to school. And the lanes are used by disabled residents in mobility scooters, cyclists, horse riders, dog walkers and farm machinery and delivery vans making it ALREADY difficult to access and get around particularly around Dog Village which is a bottle neck nightmare .

There has already been planning passed for 15 houses (23/1537/MOUT) which is already going to be difficult for a weak infrastructure to cope with .

SEWAGE SEWAGE SEWAGE !!!

I would also like to inform you that our sewage is up to max capacity with lorries pumping sewage out regularly and not coping at all !

The sewage problem will only be exacerbated . SEWAGE mixing with FLOODWATER will be a monumental environment disaster for the community .

I implore you to give very careful consideration to not pass this plan as this village is already struggling to survive as it is.

The points i have raised are very valuable points indeed and our elderly residents and parents of young children are seriously frightened and anxious and peoples mental health is being compromised !

Full name: Nathaniel Vanstone

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To whom it may concern,

As extremely concerned neighbouring residents and business owners at Little Loxbrook Farm, Broadclyst there are some very serious and worrying environmental and safety issues regards the proposal of 142 homes to be built at Winter Gardens. Firstly I would like to thank you for the opportunity to share our views and as we have lived at Little Loxbrook Farm since 2012. Since moving to Broadclyst and building a very successful equine business we have seen many things change and had to adjust to the increased flood risk and wreckless traffic speeds on the road between Cranbrook school and Little Loxbrook Farm. As you will see from the pictures and videos I have attached with a Google map screenshot also highlighting the fields and the stretches of road which fully flood due to our ever changing climate and more extreme wet weather events happening more frequently we are becoming more unviable. (You say you want local businesses to be successful and benefit?) The water levels rise so quickly in the river and are getting worse by the year with the water table barely 1 meter below ground level in a dry summer. I have two serious concerns which need very important consideration, firstly having been in the groundworks and building trade for over 25 years I know that the area proposed at Winter Gardens for 142 homes will have to have a huge rain water drainage provision with the volumes we have experienced getting worse especially the huge amount in a short period of time. Where is this RAIN WATER going to be dispersed without overflowing and mixing with the already stretched SEWAGE infrastructure that services Broadclyst which may I point out is already being pumped out by tankers probably because of the water table issue which can never be changed. The pressure 142 homes will put on local wildlife, Surrounding land, Existing residents and also the New Homes proposed will be disastrous and totally wreckless. In regards to traffic I recently had a security camera system fitted which is set off by passing cars on a

weekday roughly 900 times a day, its a country lane where I've seen walkers, cyclists, horseriders and other motorists run off the road by the speeds and pure ignorance and total disregard for the local people of Broadclyst and the businesses that support the historic village. It's become so dangerous we have personally had injuries caused by drivers and its only getting worse. There are also not many days now where there isn't a high speed police chase that passes our doors and one day soon I am extremely concerned there will be a fatality. The road conditions are horrific with potholes with no access for any pedestrian, cyclist, horserider or motorist to avoid a speeding driver. The roads around Broadclyst Secondary school and primary school can be at a standstill at school start and finish times with roads blocked, children dodging traffic and impatient rat run users (soon to be an accident with the lack of pavements and parking for both the schools) I put this to you that any houses built at Winter Gardens will destroy Broadclyst, its surrounding environment and the ground itself is not capable of taking the increased pressure from RAINWATER and EXTRA SEWAGE let alone the TRAFFIC and PUBLIC SAFETY.

[There are additional video file which could not be uploaded to commonplace which can be found in the Local plan inbox if required, they are videos of flooding in the area.]

Full name: Donna Crabtree

Organisation (where relevant): National Trust

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land west of Whimble Road, Broadclyst (Brcl_12) combined with Land to east of Town End, Broadclyst (Brcl_29) This policy identifies land to the east of Town End (Brcl_29) for 24 new homes and 0.1 hectares of employment land. This site is owned by the National Trust as investment land that was donated specifically to fund conservation work on the Killerton Estate. At Reg 18 stage, the National Trust commented on the proposed allocations and suggested that there should be a policy requirement for a holistic masterplan which incorporates both sites, to ensure the design and layout of this area is comprehensively planned. The National Trust is therefore pleased to see that site allocations Land west of Whimble Road, Broadclyst (Brcl_12) and Land to east of Town End, Broadclyst (Brcl_29), have been combined under Strategic Policy SD07 (Development allocations at Broadclyst), and that a site Masterplan is a requirement of the policy. However, the National Trust considers that further amendment to the policy should be considered to combine the housing and employment requirements of the site, to reflect the Masterplanned approach. Currently, the requirements for employment land are set out separately for each area. Area Brcl_12 is set out to accommodate approx. 0.6 hectares of employment land, and Area Brcl_29 is set out to accommodate approx. 0.1 hectares of employment land. In a Masterplanned approach, it is likely that the required employment land would be combined and delivered in one location within the wider site. Therefore, it is considered that the policy should clearly reflect this, rather than separating the requirement. It is noted that the policy requires a pedestrian access to Green Tree Lane and/or Town End to be delivered. It is considered that this combined allocation should facilitate active transport links, including cycle connectivity, and therefore consideration should be given to updating the policy wording to support appropriate cycle connections through the site, to the village, and onward to wider sustainable links to green infrastructure such as the Clyst Valley Regional Park, and ensuring cycle/pedestrian priority.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of 100 dwellings in Broadclyst, as outlined in the East Devon District Council (EDDC) Regulation 19 Local Plan, raises significant concerns regarding the adequacy of local infrastructure. The National Planning Policy Framework (NPPF) (2023) emphasises the need for local planning authorities to ensure that necessary infrastructure is in place to support new development. Paragraph 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale, and quality of development, and make sufficient provision for infrastructure, including transport, education, health, and community facilities.

4.1. Healthcare Provision The proposed development is likely to exert considerable pressure on local healthcare services. Broadclyst and surrounding areas currently experience strain in accessing primary healthcare services, with existing GP practices operating at or near capacity. The NPPF (paragraph 92) stipulates that planning policies and decisions should provide social, recreational, and cultural facilities and services that the community needs, including ensuring an integrated approach to considering the location of housing, economic uses, and community facilities and services. Without clear commitments to expanding healthcare facilities, the allocation of additional housing poses a risk of exacerbating waiting times and reducing accessibility for residents.

4.2. Education Capacity The demand for school places in Broadclyst has steadily increased due to ongoing development. The Broadclyst Neighbourhood Plan (2023) highlights concerns regarding school capacity, particularly at Broadclyst Primary School, which is already under pressure. The NPPF (paragraph 95) asserts that local authorities should plan for sufficient school places and work proactively with education providers. However, there is currently no clear evidence that sufficient investment is planned to expand educational facilities to accommodate the additional pupils that

would result from the proposed housing allocation. Without such assurances, there is a significant risk that children will need to travel outside the parish for education, placing further strain on transport infrastructure.

4.3. Transport and Highways Infrastructure. Broadclyst's road network, particularly along Station Road and the B3181, already faces congestion issues. The addition of 100 dwellings is likely to increase vehicular traffic, compounding congestion and road safety concerns. The NPPF (paragraph 110) requires that developments ensure safe and suitable access for all users and that opportunities to promote sustainable transport modes are maximised.

4.3.1. Strategic Policy SD07 of the Regulation 19 Local Plan sets out a Masterplan-led approach for the proposed development at Broadclyst. This approach is essential to ensuring comprehensive and sustainable infrastructure planning. The policy states that development should come forward only as part of an agreed Masterplan for the allocated sites, which must incorporate necessary highway and transport improvements. Without a robust Masterplan, there is a risk of piecemeal development that does not adequately address cumulative transport impacts.

4.3.2. The Broadclyst Neighbourhood Plan identifies the need for improved pedestrian and cycling infrastructure, yet there is no indication that necessary upgrades will be delivered alongside the proposed housing. Additionally, public transport services in the area are limited, further reinforcing car dependency and increasing carbon emissions, which contradicts the sustainability objectives outlined in the NPPF (paragraph 104). It is therefore critical that the Masterplan includes:

4.3.3. Strategic improvements to road infrastructure to mitigate increased congestion.

4.3.4. Enhanced pedestrian and cycle connectivity to align with the sustainable transport objectives of the Local Plan.

4.3.5. Expansion of public transport options to ensure residents can access essential services without reliance on private vehicles. Failure to adhere to the Masterplan approach outlined in SD07 could result in severe infrastructure deficiencies, reducing the quality of life for both new and existing residents.

4.4. Sewerage Infrastructure and Capacity Issues

4.4.1. A significant concern for the Winter Gardens site allocation and any future strategic housing development in Broadclyst is the capacity and resilience of the existing sewerage system. There are known issues and a history related to blockages and an overall lack of capacity; Broadclyst Parish Council has been given to understand that South West Water / Pennon Water has expressed no inclination to upgrade the existing system, some of which is Victorian. Given the anticipated additional volume

from 100 new homes, any new development must incorporate robust sewerage infrastructure improvements.

4.4.2. In line with NPPF paragraph 20(b), which requires strategic policies to plan for water supply and wastewater infrastructure, any site allocations must demonstrate that they will not exacerbate existing deficiencies. Additionally, NPPF paragraph 169 states that sustainable drainage systems should be incorporated to reduce flood risk and manage wastewater effectively. Therefore, all major housing developments should be required to provide site-specific wastewater and drainage strategies that ensure capacity enhancements are in place before occupation.

4.5. Chapter 4: Conclusion and Recommendations Ensuring the delivery of genuinely affordable housing is central to Broadclyst Parish’s vision for a sustainable and inclusive community. Rising house prices and increasing demand have made it difficult for many local residents—particularly young families, key workers, and those on lower incomes—to secure housing within the parish. Without intervention, there is a risk of long-standing residents being displaced, undermining the strong community identity that defines Broadclyst. The Broadclyst Neighbourhood Plan (NP) sets out ambitious but locally focused policies to address this challenge. By requiring a higher proportion of affordable homes in new developments and prioritising local occupancy, the Broadclyst NP seeks to ensure that housing remains accessible to those with strong ties to the parish. These homes will be integrated within well-designed, mixed-tenure developments, supporting social cohesion and enhancing Broadclyst Parish’s character. The plan also promotes rural exception sites, self-build opportunities, and adaptable housing to cater to the diverse needs of the community, including older residents and those requiring accessible accommodation. However, for development in Broadclyst to be truly sustainable, as required by the National Planning Policy Framework (NPPF), it is essential that housing delivery is infrastructure-led and community-focused. The Parish Council urges East Devon District Council (EDDC) to ensure that all housing allocations are accompanied by appropriate investment in infrastructure and public services. This includes:

4.5.1. Expansion of healthcare services, including additional GP capacity, to accommodate the growing population.

4.5.2. Investment in local schools to ensure sufficient capacity for new residents.

4.5.3. Enhancement of road infrastructure and sustainable transport options, including improved cycle routes and public transport connectivity, in line with the Masterplan approach set out in Policy SD07.

4.5.4. Adequate wastewater and sewerage provision, particularly for developments such as Winter Gardens, to prevent further strain on an already overburdened system. Furthermore, policies should fully integrate NPPF guidance to ensure sustainable, well-

balanced growth. The Devon County Council Local Cycling and Walking Infrastructure Plan (LCWIP) should be embedded into all new housing allocations to promote sustainable travel options from the outset. By aligning with the broader East Devon Local Plan while reinforcing local priorities, Broadclyst Parish is committed to delivering high-quality, affordable housing that supports its long-term sustainability. Without these infrastructure commitments, the proposed allocation of 100 dwellings risks placing an unsustainable burden on local services, contradicting the principles of sustainable development set out in national policy. Through proactive planning and ongoing community engagement, these policies aim to create a future where housing remains accessible, well-supported, and environmentally sustainable, ensuring that Broadclyst Parish continues to thrive as a place where people of all backgrounds can find a secure and affordable home.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Broadclyst Parish Council supports sustainable housing growth that meets local needs while safeguarding our environment and heritage. We urge East Devon District Council to ensure that development is infrastructure-led, community-focused, and aligned with the principles set out in the Broadclyst Neighbourhood Plan. Furthermore, policies should fully integrate NPPF guidance to ensure sustainable, well-balanced growth. Additionally, we recommend that the Devon County Council LCWIP be fully considered in all new housing allocations to ensure sustainable travel options are embedded from the outset.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Introduction Broadclyst Parish Council welcomes the opportunity to respond to the housing allocation policies set out in the East Devon Local Plan 2020-2042 (Regulation 19). We recognise the need for well-planned, sustainable housing development that meets local needs while protecting the parish's distinctive rural character, heritage, and natural environment. Our response is framed within the principles of sustainable development as set out in the National Planning Policy Framework (NPPF, 2023), particularly paragraphs 7-14, which outline the presumption in favour of sustainable development.

We note that significant growth is focused on the West End, including Broadclyst Parish. While we support planned growth, there must be guarantees that infrastructure—including roads, public transport, education, healthcare, and green spaces—keeps pace with housing delivery. NPPF paragraph 20 emphasizes the need for strategic policies to provide an integrated approach to housing and infrastructure planning, ensuring that developments are viable and deliverable.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

BrcL_12 and BrcL_29: Due to a number of grade II listed buildings and a conservation area in close proximity to the site allocation, we consider it important that development is sympathetic to local character and conserves and enhances the settings of designated heritage assets.

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.: BrcL_12 and BrcL_29:

Suggested additional policy text: “Through its layout, design and landscaping, development should respond sympathetically to the rural and historic character of the village, and should conserve and enhance the settings of designated heritage assets.”

SD08

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): WainHomes (South West) Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD08

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.:

Strategic Policy SD08: Development at Budleigh Salterton proposes to allocate the site – Land at Barn Close, Budleigh Salterton (Budl_02) – for residential development of 35 new homes

Our client fully supports the allocation.

Budleigh Salterton is classified as a Local Centre containing all 11 of the local facilities and services and three of the eight strategic facilities and services categorised by the Council. The Town has good range of services and facilities, notably more than any other Local Centre settlement and has strategic significance as a location for higher levels of future housing development. This makes it ideally placed to support additional residential development and a development of 35 dwellings, and the associated infrastructure would be fairly modest in scale and nature in terms of the Town as a whole and the scheme would be in scale with Budleigh's role and function.

The proposal is not considered to be 'major development in the National Landscape' for the purposes of NPPF 2024 para 190. The Cornwall South Coast Central AONB Management Plan outlines key indicators for determining whether a development is 'major' in its impact on the landscape. These include factors such as visual harm to the AONB/NL's scenic quality, erosion of its special qualities, incompatibility with the surroundings, and conflicts with the local community's economic and social needs. A Landscape and Visual Impact Assessment (LVIA) has been conducted to evaluate the

proposed development's impact. The site, visually well-contained by its topography, existing built form, and mature vegetation, is expected to have only minor adverse visual effects on surrounding areas. The development layout and mitigation measures, such as increased planting and buffers, are designed to soften the visual impact and blend the new dwellings with the existing settlement, particularly over time as vegetation matures.

The development, located within Budleigh Salterton, a Local Centre with a good range of services, would provide 35 new homes, including 12 affordable units. The proposal is in scale with the town's needs and would not cause significant harm to the surrounding landscape or National Landscape Designation. The development is compatible with its surroundings, with careful consideration of building materials and design to reduce visual intrusion. In addition to addressing the housing crisis in East Devon, the scheme would provide economic benefits, including job creation and increased local spending. Overall, the proposal meets the requirements of the Development Plan, and it is concluded that the development does not constitute a "major development" as defined in paragraph 190.

DELIVERABILITY

The site is subject to a live planning application in full detail for 35 new homes. This demonstrates that the allocation is fully deliverable with a willing developer able to bring the site forward early as part of the Council's Five Year Housing Supply.

At the time of writing no technical issues have been identified through the consultation process that would prohibit delivery of the site, including no objections from County Highways to the proposed vehicular access arrangements.

Following a meeting with the Town Council the application is proposed to be amended to include provision of a footway connection across the front of the adjoining site to provide pedestrian and cycle connections to the Town and its facilities.

In terms of potential sensitive impacts on Heritage and the National Landscape (NL) the application is supported by both an Archaeological and Heritage Assessment (AHA) and a Landscape Visual Impact Assessment (LVIA).

HERITAGE IMPACTS

No particular archaeological potential or designated heritage assets are identified within the site.

The closest heritage asset to the site is the post-medieval Grade II* Tidwell Manor to the north east and the AHA concludes that, even in winter, trees on the edge of the site will screen it from views from the north east. Further the orientation of the Manor house is away from the site, focussed south eastwards along a shallow valley which historically contained a formal landscape. The site visit confirmed this orientation away from the site, as well as more recent trees surrounding the main house and that the site's development would not affect its significance.

Other Grade II listed buildings lie at a greater distance or are screened by surrounding structures and topography and none would be affected by change within the site.

The AHA concludes there would no adverse heritage impacts arising from the proposal.

NATIONAL LANDSCAPE IMPACTS

As set out above an LVIA has been completed to assess how the proposed development could potentially affect landscape and/or visual amenity and also identifies features of the proposals which will assist in mitigating adverse landscape and visual impacts.

From a visual perspective, the site is visually well-contained due to the nature of the surrounding topography, the presence of built form to the west and south, and mature boundary vegetation to the eastern boundary. Where the site is visible, it is observed within the context of existing settlement of Budleigh Salterton with housing abutting the site to the south and further houses partially under construction to the west.

The site layout (see page 5 of the attached document) shows an increased set back of development from the northern boundary of the site which has allowed for an increase in open space and opportunity for further tree planting to aid in filtering views of the site from the wider NL landscape to the north.

A retained buffer to the western boundary and increased buffer to the eastern boundary ensures the retention of the existing mature vegetation and creates the opportunity to enhance these boundaries with increased planting which will also particularly assist in filtering views of the site. The landscape study concludes that:

“Visual effects have been assessed as no higher than Minor Adverse at Year 1 and Year 15 from those receptors on adjacent road routes (B3178), East Budleigh Footpath 4 and users of Bear Lane (a ‘other route with permitted access’). At Year 15, after maturation of the proposed mitigation planting, would soften the appearance of built form and help assimilate the Proposed Development into its settlement edge context.

"Views from private residential dwellings have not been tested in the field and therefore this LVIA has provided a commentary on the predicted magnitude of change as a result of the Proposed Development. The greatest change is expected to be experienced by those adjacent to the boundary of the main development area (dwellings at Hooker Close to the direct south of the Site, and dwellings at Evans Field to the direct west of the Site) who will experience a Moderate change.

"Regarding the East Devon National Landscape, the extremely limited spread of landscape and visual effects identified within the LVIA and summarised above would result in a negligible effect (emphasis added) upon the National Landscape Designation whilst the relevant special qualities would also be unaffected as a result of the Proposed Development."

Visually, the proposed dwellings at the site would be characteristic of other housing in the locality, including scale and massing, with careful choice of materials, which would ensure that the new dwellings blend well into their surroundings. Each dwelling is to be set within substantial grounds, assisting in creating a low-density development. Substantial planting as part of the scheme would help to provide a soft transition between the urban form and the rural setting beyond. It is therefore considered that the new housing would be in-keeping with their surroundings. The site would be seen in the

context of the surrounding development, with the backdrop of vegetation, which would reduce the visual appearance of the site on the surrounding landscape.

Based on the assessment in the LVIA the scheme complies with the other part of NDP Policy H4 in that the proposal would conserve and enhance the NL.

JUSTIFICATION FOR DEVELOPMENT WITHIN THE NATIONAL LANDSCAPE

The whole of Budleigh Salterton, including the application site is within the East Devon NL. There are no sites in the Town capable of delivering market and affordable housing of anywhere near the scale required to address identified needs. Therefore, any development seeking to meet the housing needs of the town would have to be located on greenfield site adjoining the BUAB and would, by definition, be within the NL.

An Affordable Housing Statement submitted with the application identifies an acute affordable housing need for both East Devon – with 5,939 households on the housing register as of 1 October 2024 – and Budleigh Salterton – 76 households on Devon Homes Choice seeking affordable housing in Budleigh with 25 in priority bands A, B and C. Analysis of waiting times and bid levels for affordable housing in Budleigh, together with higher house prices in Budleigh compared to other locations in the District, demonstrates there is an ‘exceptional need’ for the provision of new affordable homes at Budleigh within the NL. On the basis of the emerging affordable housing policy requirements the site would provide 12 new affordable homes which would make a modest but nonetheless important contribution to this deficit.

If sites within the NL were excluded from allocation in the emerging local plan not only would overall housing numbers fall short of the required figures, but future development would also be disproportionately located across the district and would not meet local need at those settlements within the NL.

WainHomes fully endorses the Council for acknowledging the need to allocate sites within the NL.

Full name: Helen Dimond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD08

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Gross under provision of housing for a town the size of Budleigh and not according with the spatial strategy (See comments for SD10) . As the inspector said in the report on the current Local Plan Budleigh 'risks becoming the preserve of affluent retirees which cannot be healthy or sustainable '

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.: Allocate more land for housing

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As before and fed up with filling this in!

Full name: Brenda Duplock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD08

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

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.: Wu

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.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

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.: Why is it so difficult to make objections to this plan?

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

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.: Why is it so difficult to make objections to this plan?

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

Full name: Chris Edser

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD08

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: concerns: New houses have been built in Evans Field; new houses are planned for the area between Bedlands Lane and Knowle Road.

- where are the plans to (a) expand the primary school, to cater for the additional pupils? (b) upgrade the sewer, water and electricity infrastructures? (c) widen Barn Lane to allow traffic in both directions? (d) provide a safe footpath from Evans Field to Bedlands Lane? (e) development of Bud-02 should not start without the developer committing to a safe path to the primary school - the Evans Field to Bedlands Lane path is still outstanding after 3+ years.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: see reasons stated in 2(a) above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: provide firm commitment and plans to mitigate the points raised in 2(a) above.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: susan gebbie

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD08

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
harm to pebblebeds, heritage, countryside and wildlife, infrastructure of local amenities such as schools and doctors insufficient, sewerage and water not sufficiently robust

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Deb Shatford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD08

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There is insufficient infrastructure in Budleigh to support these new houses. There is already a 3 week wait for a doctors appointment, the roads are in poor condition and further traffic would contribute more to this. The school children are in portacabins. The sea has almost daily sewage spills from South West Water, as sewers unable to compete with demand, especially if we have small amount of rain. Additional houses would make this even worse.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

SD09

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Acorn Property Group

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

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.:

ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP

1 INTRODUCTION Acorn Property Group is a very well-established, locally based housing developer and land promoter with interests across the district. Acorn Property Group has helped to facilitate new homes, affordable housing and other uses in the area. They are an independent development and regeneration specialist that has, successfully created a range of residential-led refurbishment and new build schemes. Specifically, Acorn Property Group has interests in land at Hillhead, Colyton, which is an allocated site in the Emerging Local Plan which is suitable for residential development. Given the nature of their long-standing delivery of housing in the district, Acorn Property Group is an important local stakeholder within interests in the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations.

CHAPTER 5. DEVELOPMENT IN THE TOWNS AND VILLAGES

Strategic Policy SD09: Development Allocations at Colyton Acorn Property Group supports the development allocations for Colyton listed in Strategic Policy SD09 and identified on the Policies Map, particularly Land at Hillhead (site reference Coly_02) for which they have existing land interests. Acorn is the housing developer who will build out the site and deliver the housing specified. The inclusion of Coly_02 for residential-led development is clearly supported as it represents a logical approach to development and growth to the south of Colyton (in an un-designated landscape) noting the constraints that exist elsewhere in the settlement. The specific policy allocating Coly_02 states; “Land at Hillhead (Coly_02) This site, to the west of Colyton, is allocated for 49 new homes. In order to ensure no adverse effect on the integrity of the Beer

Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Approach roads to this site are narrow, largely ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 single width, and as such highway improvements may be needed with potential rerouting needed through the site.” On these technical points we would ask it to be noted that:

- Appropriate ecological mitigation will be provided to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC will occur.
- Whilst noting highway improvements are suggested within the policy, studies undertaken by the applicant confirm that the site is entirely deliverable from a highways perspective. DCC Highway comments in the site assessment work undertaken by the Council confirms that appropriate access can be delivered to the site. As such, the allocation of the site for residential development is sound and supported by appropriate officer assessment in the submitted evidence base.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Acorn Property Group

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

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.: see attached

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: see attached

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: see attached

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Helen Parr

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Chap 5 Development in the Towns and Villages

SD09 Development allocations at Colyton- Land at Hillhead(Coly 02) 49 houses
Objection- No employment provision Approach roads narrow, largely single track. Risk of effect on bats at Beer Quarry and Caves SAC Inadequate sewage system Primary School provision at Colyton and Seaton inadequate to accommodate expected numbers of children this development will generate.

Land adjacent to the Peace Memorial Playing Fields (Coly 06a) 12 dwellings Objection- No employment provision Part site in flood plain of River Coly. Site has been earmarked by CPC for a new school for over 20 years, is a central site, has two car parks, space for sports and play space on the Peace Memorial Playing Fields, and is next-door to the Preschool Nursery and Youth Centre. The existing school site is landlocked and children are being taught in mobile classrooms. This site could be sold and developed for housing which would part fund the new school.

Full name: Alison Mary Stenning

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This site is adjacent to the pre-school nursery and youth centre, long established by Colyton Parish Council as the only central site for a new Primary School as the current school is land-locked and cannot expand further. With 72 new houses being built in Colyton, where are the children going to be educated? DCC have agreed this site should be retained for a Primary School when they have the funding (I can provide the evidence after the consultation has closed).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Another site has been offered to EDDC in the Green Wedge above Courtney Drive in the Old Orchard. It could accommodate at least 60 houses .

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It's taking away Colyton's ability to prepare for future generations. There's nowhere else for a Primary School to be built. It was earmarked by the Parish Council more than 20 years ago for a new Primary School. Now that the CeramTec site has gone with 72 new houses being built, where else can one be built?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I think this is vital for Colyton and its future generations.

Full name: Alison Mary Stenning

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

1. Area of Great Landscape Value protected by the NPPF
2. Great Crested Newts breed in the attenuation pond in the field across from Clay Lane. Building and development work would harm them and their habitats which are protected by law.
3. Foraging ground of Grey Long-eared bats on the Red List of Endangered Species. There are only around 1000 of these mammals in the whole of the UK with a maternity roost just over 1000 metres away in Colyford. Radiotracked and registered over the past few years, they then fly down Burnards Field Road.
4. Beer Quarry and Caves SAC and bat activities over this field include foraging and the provision of connectivity between designated roosts for both the Lesser Horseshoe Bat and the Greater Horseshoe Bat, as well as the Key Lesser Horseshoe Bat Sustenance Zone (the area which includes critical foraging and commuting habitat for the bats). The Key Lesser Horseshoe Bat roost at Coles Mill is around 1,075 metres away, whilst the roost at Alaska Farm, Colyford is around 1,200 metres from the site. Colyton Rest House in the cemetery at the end of Burnards Field Road is a suspected mating site of Greater Horseshoe bats.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy

or paragraph. Please be as precise as possible.: This is an unsuitable site to develop for obvious reasons and cannot be modified to make it legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- 1.No consideration of the inevitable Ecological damage.
2. 20 houses were built at Seaway Head as a Rural Exception Site for Social Housing for local people and it is a blot on the landscape above the 200 foot contour specified by the Government Inspector not to be built above to preserve the setting of the historic town of Colyton and its conservation area in the late 1980s and which 92% of residents voted for in agreeing with the Colyton Parish Neighbourhood Plan (the other 8% were from Colyford who have since formed their own Parish Council) . There is no street lighting in this development and neither could there be in the proposed development because of the bats.
3. It's an unsustainable development on the skyline and can be viewed from across the Axe Valley and the Coly Valley, both in the East Devon National Landscape (AONB).
4. Lack of employment opportunities in Colyton will result in commuters. It would destroy Love Lane and Fair View Lane (Colyford) as commuters seek access to the A3150.
5. It's isolated from the town centre at the top of a very steep and narrow hill so residents would use cars. Colyton already has a traffic problem due to the medieval layout of its roads.
6. Lack of basic infrastructure - Primary School placement shortages and tiny GP practice.
7. Accessible only from single track lanes which run with surface water. Clay Lane is little more than a footpath whose banks keep collapsing.
- 8.High risk of flooding due to clay soil and too far from River Coly to drain surface water.
9. Blind bend at junction of Old Sidmouth Road and Hillhead which cannot be improved upon.
9. The properties at Burnards Field Road to the northwest of the site are at a considerable lower level and are at risk from flooding. The gardens already flood regularly and there are privacy and security concerns.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This is an unacceptable site for development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Mainly environmental protection and infrastructure planning. Another site has been offered to EDDC in the Green Wedge above Courtney Drive in the Old Orchard which is closer to the town centre, the river, sewage works and the main road B3161 without building above the 200 foot contour or destroying wildlife habitats. It could accommodate at least 60 houses and would not be visible from afar. It would constitute a natural development of Courtney Drive and would not stick out like a sore thumb.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am determined the proposed development is unlawful.

Full name: Ian Priestley

Organisation (where relevant): Colyton Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

2;COLY2 ,Its location, despite being within the Colyton parish boarder ,will have the most impact on COLYFORD village. The quickest way to the main road(A3052) Tesco and the proposed other outlets in Seaton is along 2 narrow lanes down one of which walk 1000 Colyton grammar school children twice a day. The residential sections of the Fairview lane and Gully shute are narrow and would become dangerous if this crazy proposal ever came to fruition. It would also have a visual impact across the Axe valley as the site is at the top of a hill and would make it the highest built up area in the whole valley. Concentrate on relocation the Colyton primary school and use its footprint to build houses,which ,I believe, is Colyton parish council's wish.

Full name: Sasha Haines

Organisation (where relevant): Colyton Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

2.6 Site Coly 02a and 02b does not comply with modest and sensitively planned development to meet the needs of the local community. The site is too big for Colyton's needs, there is no evidence to support it's size, particularly as there are currently 72 houses being built on the old CeramTec factory site. The sites are also insensitive to Colyton's valley setting in that it extends over the historic 200ft contour line and up to the skyline.

2.7 The sites do not bring better facilities, Colyton needs a new Primary School and updated sewage facility. No mention of these is in the proposed plan. Where is the East Devon water cycle survey?

2.8 There is no plan to expand community facilities such as the Primary School, nor the infrastructure such as a desperately needed update to the sewage system.

2.10 The plan makes no measures for job creation or help with a resilient economy. There are no jobs to support this number of houses, making this site unsustainable. Site Coly 06a This is the only viable site for a new Primary School. Devon County Council supports this. To build on it would go against 2.7 and 2.8 in that it would prevent better facilities for Colyton. Colyton cannot support the proposed number of houses without a new Primary School. The plan does not comply. Site Coly 02a and 02. 3.2 These sites are not in a sustainable location. There are no jobs, supermarkets, dentists or Secondary Schools in Colyton these will necessitate more cars and more travelling. This will increase pressure on local roads which are already inadequate. Also the Primary School is too small to take the projected increase in children from these sites, as well as

the sewage system already being inadequate. These sites do not fulfil the criteria laid down in the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: We feel it is necessary to remain informed.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land adjacent to the Peace Memorial Playing Fields (Coly_06a) - We are supportive of the requirement for a detailed Flood Risk Assessment, and the identification that flood zone 3 land may offer scope for open space, but should not form part of gardens, car parking, and other features associated with individual plots. This is a clear policy requirement which will ensure that issues around permitted development and ownership do not compromise flood conveyance and storage.

SD10

Full name: Sara Davies

Organisation (where relevant): Lymptstone Water Quality Group

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The proposed developments at Lymptstone - 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 Lymptstone 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(b). If no, please give details 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 Lymptstone (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(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 Lymington on the Exe Estuary, and our review of regulatory requirements and best practice standards.

Full name: Nick Yeo

Organisation (where relevant): 3West Group Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

[Summerfield Planning on behalf of 3West Group Ltd] 3West Group support Strategic Policy SD10 and specifically the proposed allocation of the Land north west of Strawberry Hill, Lympstone (GH/ED/73).

An outline planning application for the site for up to 42 dwellings (application reference: 24/0301/MOUT) received resolution to grant planning permission at the EDDC planning committee held on the 19.11.2024.

The planning application site location plan is attached for reference.

The planning decision is pending agreement of a Section 106 Legal Agreement which at the time of writing is at an advanced stage with a planning decision expected to be issued during April 2025.

A reserved matters planning application has been prepared and is awaiting submission.

As a result of the comprehensive programme of work undertaken in support of the planning submission and approval of the planning application by EDDC, the site is proven to be deliverable.

We can confirm that construction work is forecast to commence during 2025 (subject to the timely grant of reserved matters planning) and therefore the site is able to make a valuable contribution to EDDC's 5 year housing land supply.

We fully support the inclusion of the Land north west of Strawberry Hill, Lymptone (GH/ED/73) in the Regulation 19 plan as housing allocations.

The site remains a very good candidate for allocation in the emerging Local Plan, and this is supported by the technical work and masterplan's prepared to support the planning application.

Due to the imminent grant of Outline planning permission, we are able to demonstrate the deliverability of both sites to meet the Local Plan objectives. Furthermore, the site is able to make a meaningful contribution to EDDC's 5-year housing land supply.

We trust our comments will be fully taken on board and the allocation of the site is confirmed.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be available at the hearing session to provide further clarification or respond to any site specific queries from the Inspector or third parties.

Full name: Nick Yeo

Organisation (where relevant): 3West Group Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

[Summerfield Planning on behalf of 3West Group Ltd] 3West Group support Strategic Policy SD10 and specifically the proposed allocation of the Land at Gilbrook, Woodbury (Wood_10).

An outline planning application for up to 60 dwellings (application reference: 23/2166/MOUT) received resolution to grant planning permission, at the EDDC planning committee, held on the 19.11.2024.

The planning application site location plan is attached for reference.

The planning decision is pending agreement of a Section 106 Legal Agreement which at the time of writing is at an advanced stage with a planning decision expected to be issued during April 2025.

A reserved matters planning application has been prepared and is awaiting submission. As a result of the comprehensive programme of work undertaken in support of the planning submission and approval of the planning application by EDDC, the site is proven to be deliverable.

We can confirm that construction work is forecast to commence during 2026 (subject to the timely grant of reserved matters planning) and therefore the site is able to make a valuable contribution to EDDC's 5 year housing land supply.

The site remains a very good candidate for allocation in the emerging Local Plan, and this is supported by the technical work and masterplan's prepared to support the planning application.

Due to the imminent grant of Outline planning permission, we are able to demonstrate the deliverability of both sites to meet the Local Plan objectives. Furthermore, the site is able to make a meaningful contribution to EDDC's 5-year housing land supply.

We trust our comments will be fully taken on board and the allocation of the site is confirmed.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be available at the hearing session to provide further clarification or respond to any site specific queries from the Inspector or third parties.

Full name: Nick Yeo

Organisation (where relevant): 3West Group Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

3West Group support Strategic Policy SD10 and specifically the proposed allocation of the Land north west of Strawberry Hill, Lympstone (GH/ED/73).

An outline planning application for the site for up to 42 dwellings (application reference: 24/0301/MOUT) received resolution to grant planning permission at the EDDC planning committee held on the 19.11.2024.

The planning application site location plan is attached for reference.

The planning decision is pending agreement of a Section 106 Legal Agreement which at the time of writing is at an advanced stage with a planning decision expected to be issued during April 2025.

A reserved matters planning application has been prepared and is awaiting submission.

As a result of the comprehensive programme of work undertaken in support of the planning submission and approval of the planning application by EDDC, the site is proven to be deliverable.

We can confirm that construction work is forecast to commence during 2025 (subject to the timely grant of reserved matters planning) and therefore the site is able to make a valuable contribution to EDDC's 5 year housing land supply.

We fully support the inclusion of the Land north west of Strawberry Hill, Lymington (GH/ED/73) in the Regulation 19 plan as housing allocations.

The site remains a very good candidate for allocation in the emerging Local Plan, and this is supported by the technical work and masterplan's prepared to support the planning application.

Due to the imminent grant of Outline planning permission, we are able to demonstrate the deliverability of both sites to meet the Local Plan objectives. Furthermore, the site is able to make a meaningful contribution to EDDC's 5-year housing land supply.

We trust our comments will be fully taken on board and the allocation of the site is confirmed.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be available at the hearing session to provide further clarification or respond to any site specific queries from the Inspector or third parties.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMLIII Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We support the allocation of Mr and Mrs Parks' land at GH/ED/72a - Land at Meeting Lane for housing. The site is available and suitable for housing development. However, the Local Plan Review preferred options consultation which ran between November 2022 - January 2023 identified a much larger area of land at Meeting Lane, Lypstone (LP_GHED/72) as a preferred choice site allocation for 131 new homes and 0.52 hectare of employment land as illustrated on the plan extract below. This followed an assessment by the Council of all potential development sites within Lypstone which concluded in respect of all the land at Meeting Lane (GH/ED/72) that it is, "Well related to settlement and limited sensitivities. Good pedestrian access. Whilst in the existing coastal preservation area very limited views to the sea". Then in September 2024, in a report to the Strategic Planning Committee the entire allocation was proposed to be deleted with the following explanation, Whilst the west field is slightly contained within a 'bowl' with a ridge to north, the east field is open and more exposed. Views of site generally show an undeveloped, wooded skyline, but lightly settled on SW edge where there are existing dwellings. Within Coastal Preservation Area. Overall, a high/medium landscape sensitivity to new development". The following month however, in a report to the Strategic Planning Committee of 29 October 2024, it was recommended that the southern part of the western field only should be allocated, with an explanation as follows: "If whole site is not suitable for allocation, could a smaller part be allocated? Yes – potential to allocate the south western part of the site for development, adjacent to existing dwellings and better contained within the existing landform than the rest of the site. Around 1.5 hectares is potentially suitable for around 42 dwellings (indicated on map below) but need to consider impact on Nutwell Park to west including Grade II* Nutwell Court, and the location within the Coastal Preservation Area". Consequently,

the Reg 19 version of the plan only proposes a part of Mr and Mrs Parks' land which is available for development despite the Council's most recent assessment (in September 2024) only identifying the eastern field as "open and more exposed". There has been no explanation as to why the whole of the western field would not be suitable for allocation. Indeed, the western field currently contains two existing very large, modern agricultural barns adjacent to its eastern boundary which is its highest point. A residential development across the whole of the western field would be far less prominent within the landscape than these existing barns. Given that the currently proposed level of housing at Lypstone is, as has been identified above, significantly below the levels at some of the other Local Centres and even either lower or not dissimilar to the scale of housing proposed at many of the lower tier Service Villages, we consider that there is an opportunity to correct this anomaly by allocating more land at Meeting Lane, including at least the whole of the western field which the Council's own evidence appears to support. As evidenced by the findings of the Council's own assessment, the development of the whole of the western field would not adversely affect the objectives of the Coastal Preservation Area policy and would be capable of respecting the setting of the adjacent Nutwell Park. We object to the omission of the wider western field as a proposed allocation because it makes Strategic Policy SD10: Development allocations at Lypstone neither Positively Prepared nor Justified.

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.:

However, this soundness issues could be remedied by extending the GH/ED/72a - Land at Meeting Lane allocated site to include the whole of the same field. The allocation of the whole of the western field would enable an increase in the number of dwellings within the allocation, which we suggest should be increased to in excess of 60 dwellings. Mr and Mrs Parks have been working with a local SME housebuilder and have undertaken technical and planning preparatory work which has confirmed the deliverability of the western field to provide homes that are in keeping with the surrounding area, provides connectivity to footpaths and bus stops and provide open space for people's wellbeing. We can also confirm that all of the land originally identified by the Council at the preferred options stage remains available and deliverable for development.

Full name: Joseph Marchant

Organisation (where relevant): Context Logic Ltd

Other party name (if relevant): Messrs Ford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

[Effectively a call for sites entry putting forward their site in Lympstone - Submitted on behalf of client regarding land to the rear of Dawlish Park Terrace, Lympstone, EX8 5AA. Sites ls13l1n.]

Consultation Response to the East Devon Local Plan 2020-2042 (Regulation 19 Consultation) - Site Reference: ls13l1n, Land to the Rear of Dawlish Park Terrace, Courtlands Lane, Lympstone, EX8 5AA, plus additional Land Title DN752646

1.0 Background Representations

1.0.1 I write to you on behalf of the owners of Land Titles DN752646, DN473230, and DN499527, regarding the opportunity to give Representation as part of the Regulation 19 Consultation to the Local Plan 2020-2042. Part of the land which I write to you about was submitted as part of the Call for Sites in February 2021. The site that was submitted included 2 Title Numbers: DN473230 and DN499527. An email receipt from the Local Plan process was generated on 5th February 2021 at 11.34, reference ls13l1n.

1.0.2 In the Site Selection Report for Lympstone, it is noted that reference is not made to the above-mentioned site, ref ls13l1n, that was put forward. In principle, the land that was submitted can deliver 5+ dwellings. The land has mains water, foul drainage, power, and telecommunications available, and can achieve good access.

1.0.3 Since the time of the Call for Sites, neighbouring land has also become available. Land Title DN752646 is now offered for inclusion in the Local Plan.

1.0.4 The land is part of an existing urban block at the southern end of Lymptstone, and is one of the closest sites that was put forward in the context of the largest private employer in the village, Lymptstone Manor. The site is well connected to transport hubs.

2.0 Representations to the Consultation of the Local Plan

2.0.1 It is noted that the Preferred Site allocations for Lymptstone largely include sites that complete existing urban blocks, and that site Lymp_01 offers no greater capacity for development than that offered at the rear of Dawlish Park Terrace.

2.0.2 With regard to landscape value, historic environment, ecology, and flood risk, the land presented by my clients is suitable for development.

2.0.3 Lymptstone is a highly desirable location for allocation given the number of available services, and in particular, the availability of good transport and cycle routes. Key employment and leisure facilities can be accessed via the public transport and cycle connections. Within the village, there are employment opportunities, the largest private employment opportunity being 3 Lymptstone Manor. To cater for employment opportunity and staff demands, close to Lymptstone Manor, it would be desirable to see existing brown field sites within walking and cycle distance of the Manor promoted in the Local Plan. My clients' site is the closest site to this significant employer.

2.0.4 The total area of the site now being put forward, including Title Number DN752646, could now achieve additional dwellings. The site is brownfield, and therefore should be a priority for development opportunity.

2.0.5 There is nothing about the character of the site which would compromise its ability to deliver housing, and given that existing housing surrounds the site, there would be no contextual adversity created by development of the land being put forward.

2.0.6 Given the need for diverse housing options, this site should be considered for allocation. The allocation and development of this site would improve the amenity of the land, which at present, is empty, previously developed land, and does not contribute to amenity value at present.

3.0 Summary

3.0.1 Attached are the 3 Land Titles relevant to the single block of land, which has been previously developed, and which is now empty, and which should be allocated for having development.

3.0.2 The attached Title Numbers DN473230, DN499527, and DN752646, show the names of the owners who seek allocation.

3.0.3 The Site is capable of development with no adverse impact, and sits in close proximity to the most significant private employer within the settlement, making it a desirable and sustainable site for allocation.

Full name: Helen Dimond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are 3 sites allocated ,including one in Woodbury Parish (GH/ED/72a) on which Lympstone Parish Council was barred from making representations at the Strategic Planning Committee of East Devon District Council when this allocation was considered. The site is on rising ground on the approach to the village, in the Coastal Preservation Area and adjacent to the listed Nutwell Park. The three sites add up to 92 houses which together with the site at Courtlands Cross give a total of 192 houses . This far exceeds the stated aim of Policy SP01 of development for Local Centres 'that meets local needs and those in the immediate surroundings.

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.: Omit site GH/ED/72a from the allocations

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Helen Dimond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are three sites allocated including one in Woodbury Parish (GH/ED/72a) on which the Parish Council was barred from making any representations. The three sites add up to 92 houses which together with the site at Courtlands Cross give a total of 192 houses . This far exceeds the stated aim of Policy SP01 for development for Local Centres 'that meets local needs and those of the immediate surroundings) Sidmouth a Main Centre has site allocations for 157 dwellings and Budleigh Salterton only 35(this was increased from an original estimate of 25 for the site) These allocations are both less than for the village of Lymptone . The allocations are not in accord with the Spatial Strategy . The inspectors report on the current Local Plan relating to Sidmouth,Seaton and Budleigh stated that 'The Plan's strategy risks (such) coastal towns becoming the preserve of affluent residents which cannot be healthy or sustainable. This is even more the case in this plan. This relates back to my comments for SP01

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.: Omit site GH/ED/72a and find additional sites in Sidmouth and particularly Budleigh Salterton

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to make sure I do as much as I can to ensure an appropriate level of development for Lympstone

Full name: Dave Jones

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Not compliant with the following:

Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1, SD10 and SD11 development from the Local Plan. South West Water demonstrably cannot be trusted to address the issues and even if they try, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, and add to sewage pollution of local rivers, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The sewage situation is so out of control it's actively harming local people and the natural environment. Allowing more development before this is fixed is completely unacceptable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy does not take into account the already acknowledged failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: EDDC has completely failed to act upon feedback given by local people and parish councils.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mark Robert Moffat

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The developments around Lypmstone at least do not appear to be sustainable. There is a lot of development already underway in Exmouth and Lypmstone with little regard as to whether the infrastructure can support it. Secondary schools are close to or beyond capacity and no plans for how additional health care would be provided are apparent. The majority of the traffic originating in the area passes through the Sandygate roundabout, which is at 84% capacity already. Already, during the main commuter times, it can easily take half an hour to travel the four and a half miles between Lypmstone and the Sandygate roundabout. If the intention behind the new Dinan way bypass is to increase the flow of traffic onto the A376, then this will only make the situation worse. The proposed developments Exmo_23, Lypm_01, Lypm_07, GH/ED/72A and GH/ED/73 also demonstrate a lack of awareness of the local infrastructure. Although Lypmstone does have a small railway station, the railway runs alongside the river Exe estuary, so any new development has to take place to the East of the station, outside the current built up area boundary and at considerable distance. In this situation, it is highly unlikely that the occupants of any new development would use rail travel to any significant extent. Due to being bounded by the estuary on the western side, all traffic entering and leaving Lypmstone must use or cross the A376. Increasing the size of Lypmstone village by such a large proportion, with no possibility for alternative routes of entry or exit can do nothing but increase congestion both within the village and on the A376 itself. Sites GH/ED/72a and GH/ED/73 are both situated within the Coastal Preservation Area. Allowing development there goes against EDDC's own policies and has the potential of damaging a site of international importance for wildlife. The inclusion of GH/ED 72a is vexing for Lypmstone as, although it is immediately adjacent to and will negatively impact Lypmstone village, putting pressure on local facilities, it is actually within the neighbouring parish of Woodbury. It was very noticeable that, although Lypmstone parish councillors and our representatives on EDDC were prevented from speaking on it at the strategic meeting, Woodbury

councillors were allowed to not only speak on this site, but also to speak about one of the sites within Lympstone and not even adjacent to their own parish.

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.: Lymp_07 is within

Lympstone yet has been included within the allocation for Exmouth. No good reason appears to have been given for this and the impression given is that over time, there will be a coalescence, resulting in the loss of Lympstone as a separate entity. This is a very large development in relation to the size of Lympstone. It has the potential to increase the flooding risk, being upstream of the village and situated on a clay subsoil. If development were to take place here, extensive attenuation measures should be in place. With the exception of Lymp_01, all of the proposed sites within and adjacent to Lympstone are more than 800m from existing key services and will result in increased car use. With the A376 being so congested already and only likely to get worse, sites should have been allocated in locations with at least the potential to increase infrastructure to meet the growing need.

Full name: jane moffatt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

GH/ED/72a and GH/ED/73 should be located in a different site which is not in the coastal preservation area as seem on map 5a of the local plan and part of the pebblebed heath. These would fragment and isolate habitats and destroy wildlife corridors, contrary to paragraph 13.23. of the local plan. The wildlife corridors in these sites in particular take wildlife from the Exe estuary at Lypstone up to the pebblebed heath and common. These sites will be detrimental to irreplaceable habitats, veteran trees and species rich in hedgerows across the site contrary to paragraph 13.9 Both sites are upstream of the worldreknowned Exe estuary mudflats and the loss of infiltration in an area which regularly floods will then flow from these sites down into those mudflats destroying habitat. This is in conflict with policy AR01B.

Both these sites would increase the need for car travel and increase congestion on the A376. Lypstone as a small village has been targeted for housing using the excuse that it has a railway station. In truth, the majority of journeys to work, school and weekly shop is done by car. The increase in traffic congestion is in conflict with paragraph 11.2.

Lypstone being on the River exe only has one direction out and exclusively onto the A376. The access lanes already flood regularly making the village inaccessible. These sites in particular will exacerbate the flooding and access issues. The access to the A376 would be at Harefield cross which has already experienced 2 serious accidents this month alone. The A376 is at capacity and building along this road is not sustainable.

The decision to include 72a is a controversial one for the parish of Lypstone. It is in Woodbury parish and the detriment it will bring to Lypstone village by putting pressure

on already full services and infrastructure such as school, doctor, parking, flooding etc is against policy 0L05 and even worse, lymptone parish council and our EDDC councillors were banned from speaking at the strategic meeting for these sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site GH/ED/72a and GH/ED/73 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Peter Strouts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The two developments for 42 houses are nearly a mile from the centre of the village, meaning they are not served by the local rail service or the cycle path, nor convenient for the school, shops etc. This is against a net zero policy, as it would increase car use. They are located off very narrow country lanes, where visibility is very poor. There is no doubt that any access would be unsafe. I cycle my children every day to school along these roads, these developments would end my ability to do this. Pushing myself and more residents to have to use the car, a net zero target is laughable with this.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove these allocations for development. Certainly both 42 house developments must be axed.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Lymptone proposals are not sustainable developments and therefore not sound. They are in areas of poor access, Harefield cross onto the A376 is unsafe to use by car, Meeting Lane has a blind corner and already two large logistics buildings that block the road for one time when they are being accessed. The resident who lives in this field is young and yet drives to the primary school from here. There is not sufficient parking at the local primary school so they all park on Greenhill Avenue's pavements, making it

unsafe for children to actually walk to school. These developments will worsen the amount of car use in the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the proposed developments, especially the two 42 house sites on Meeting Lane and Strawberry Hill.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is making Lympstone unsafe for residents who rely on these roads to cycle to school and increasing car use. Why not put the houses in another village, where the effect is less pronounced?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As these development plans in Lympstone are not acceptable.

Full name: Sophie Thompson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

GH/ED/72A and 73 lie in a coastal protection zone which is a sensitive landscape from a character and visual impact perspective and adjacent to pebble bed heaths. Policy OL03 states no development in Coastal Protection areas so this feels at odd with that. It is also adjacent to the Exe estuary RAMSAR.

The sites also include veteran trees and species that are important for nature conservation in the hedges, contravening other EDDC policy.

Impact these designations and fragment habitats and wildlife corridors. Contravening paragraph 13.23. These connect protected estuary wildlife with pebblebed heaths. We are in a catastrophic situation in the UK with habitat loss and biodiversity decline and these type of blanket changes have severe impacts that are widespread.

In addition, these roads experience regular flooding and can be impassable after a storm event, further development would exacerbate this.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I suggest that GH/ED/72A and 73 and LYM 07 be removed from the Local plan area designations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Thorne BA DipTP MRTPI(Rtd)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land South of Underhill Close The site within the respondents' ownership is shown on the Lymptone Inset Map forming part of the Reg. 19 Consultation. It lies to the west of Housing allocation site Lympt_01 between that site and the railway embankment. In the previous Reg.18 Local Plan Consultation map it was shown as Lympt_16 and shaded in blue (referred to in the key as 'Planning Permission Granted') and within the settlement boundary of Lymptone. (See below). Over 50% of the land is hard surfaced tarmac which was laid out as a car park during local works by a statutory undertaker.

In a site selection report to the Council's Strategic Planning Committee of September 3rd 2024 it was stated that the respondents' site LYMP_16 (0.3ha) was not identified as a potential housing site in the Housing and Economic Land Availability Assessment (HELAA) on the grounds that it fell below the size threshold. However the introduction to the HELAA states that the criteria for inclusion is a minimum size of 0.15ha with capacity for 5 dwellings. The respondents' site should therefore be properly considered as a housing site with potential for delivery of 5 dwellings. The adjacent Lympt_01 site was described in the same report as follows: "Fairly level garden and field adjacent to Lymptone. Site adjacent to Coastal Preservation Area and features multiple small parcels of land with some garden areas. Mature trees across site, mature hedgerows throughout. Nevertheless, small scale site with existing dwellings around provide a built context, and overall, low landscape sensitivity to new development." The aerial photograph from that report is reproduced below. The respondents' site containing the car park is in the bottom left hand corner.

The previous owners of the respondents' site made representations to the Regulation 18. consultation in January 1993 (Copy attached) supporting the designation and

settlement boundary and making the case for the suitability of Lymp_16 for housing development in the same manner and density as Lymp_1. This latter point was not given adequate consideration or weight. On the regulation 19. Consultation inset to the Policies map, without any prior consultation, justification or explanation, a new and illogical rectangular inset has been drawn around the respondents' site, excluding it from the settlement boundary. On this plan it has been colour coded green as part of the 'Green Wedge' between Lymptstone and Exmouth but is otherwise unmarked. The previous colour coding acknowledging it as land with 'planning permission granted' does not appear. The circumstances of the site are that it benefits from planning permission for redevelopment (Granted on appeal on two occasions) and has been acknowledged by successive Planning Inspectors as capable of development with a negligible impact on the Green Wedge and Landscape Quality, to be in a sustainable location, and to read as infill which would relate very well to surrounding housing. In the decision on the first appeal (1st March 2022) APP/U1105/W/21/3282445 The Inspector wrote: "The development would read as infill and would relate very well to surrounding housing, falling inside a notional building line across this southern extent of the village." " .. the scheme performs well against the sustainability objectives set out within the Framework." "...the site would be suitable for the proposal, having regard to the development plan's approach to the location of housing."

As it meets the relevant criteria the site has been submitted for inclusion on the Council's register of brownfield land.

In the Interim the LPA has also, in advance of any formal acceptance of the Lymp_1 allocation, already granted planning permission for two detached dwellings on the westernmost part of that site. In a report of October 2024 in making that decision the Council considered a report containing the following statement: (Officer's report to the planning committee of 23rd October 2024 recommending that permission for two detached dwellings be granted on part of the LYMP_01 site.) "Overall, whilst there is some conflict with the adopted local plan, it is considered that due to the sustainable location of the site, the need for new housing, and the resolution to promote the site as a preferred allocation in the emerging local plan, the principle of development of this site is acceptable. The proposed dwellings are considered to be acceptable in terms of layout, scale and appearance and would not result in any significant harm to the character and appearance of the area or the Green Wedge designation to justify refusal of the application. The proposal is accompanied by detailed landscaping proposals which include maintaining the southern hedgerow at an appropriate height along with additional planting which would help to soften the impact of the development in localised and wider views." The report contained no comment from the Council's

Landscape Officer and went on to suggest that the previous grant of planning permission at appeal on the respondents' site (Lymp_16) demonstrates that development can be accommodated within the green wedge and outside the settlement boundary without harm. It should be further noted that the means of access to the two house development in question uses Underhill Close, rather than that from Underhill Crescent envisaged in the Lymp_1 allocation.

The respondents object to the unsound approach to housing allocation in the Regulation 19. Consultation which does not meaningfully address the requirements of the NPPF and emerging Government Policy, or take an appropriate approach to the sustainable delivery of housing.

- The Respondents object to the failure of the Regulation 19. version of the plan to give full and proper consideration to the deliverability of the projected housing land allocations therein in the context of the statutory requirement to provide BNG uplift in the context of development proposals.
- The respondents object to the over-reliance on agricultural and other open land to provide future housing sites whilst demonstrably failing to identify and promote the development of more sustainable brownfield land. In particular there has been a failure by the LPA meet its statutory duty to maintain and publish annually a register of Brownfield land. (This has not been done since 2021).
- The respondents consider the LPAs approach should show greater to support housing delivery on smaller brownfield sites, including Lymp_16 which, are demonstrably deliverable, sustainable, accessible and ready for development, as part of their Housing Land Identification.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The respondents object in the strongest possible terms to the illogical, unjustified and arbitrary change to the settlement boundary line resulting in the exclusion of site Lymp_16 from the Lympstone boundary. This line should revert to the position on the regulation 18 map.

5th March

Full name: Mary Turner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Chapter 5, Development in the Towns and Villages" POLICY SD01 and SD10
(development proposals off Meeting Lane, Lymptstone.

- I do not believe this policy is sound. The infrastructure does not exist to support these developments and they risk damaging important wildlife habitat (particularly for bats) and negatively impacting flood risk due to run off from increased hardstanding.

GH/ED/72a and GH/ED/73 should be located in a different site. This site sits within the coastal protection area and is also adjacent to the pebblebed heath. The little cation of these sites would cause fragmentation to and the isolation of habitats. Wildlife corridors are an important element for wildlife and their destruction is contrary to paragraph 13.23 of the local plan. Wildlife corridors around these sites offer important routes for wildlife to travel between the Exe estuary at Lymptstone up to the pebblebed heath and the common. They are irreplaceable habitats containing veteran trees and mature, species rich hedgerows across the site contrary to paragraph 13.9.

Both sites are upstream of the world renowned RAMSAR Exe estuary mudflats which would result in the loss of filtration in an area which regularly floods. Damaging run-off would then flow from these sites down into the mudflats and this would be destructive to this world renowned RAMSAR habitat. This is in conflict with policy AR01B.

The allocation of both these sites in the local plan is contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe RAMSAR area around the village of Lympstone is visited by tourists and ornithologists from all over the world and it is vitally important that they are protected longterm.

Congestion of the already overused A376 would be increased by the additional traffic.

Lympstone is a small village and although it has a train station the majority of journeys to work, school and weekly shop are done by road. The increase in traffic congestion is in conflict with paragraph 11.2.

This development is unsustainable, and residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6.

Lympstone has only one direction out by road, via the A376. The access lanes already flood regularly and can make the village inaccessible. These sites in these locations will exacerbate these flooding and access issues.

The decision to include 72a is controversial since it is far from the village of Woodbury despite being in Woodbury parish. In practice residents would need to cross the A376 and navigate several miles of lanes to reach Woodbury services, so residents would inevitably put additional pressure on already full services and infrastructure such as school, doctor, parking, flooding etc. This is against policy OL05.

Site LYMP_07

LYMP_07 is upstream of Lympstone on the main rainwater catchment area of Wotton Brook. The subsoil here is of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Lympstone Village. This is in conflict with POLICY ARO1B.

LYMP_07 has been assigned in the local plan in contravention of strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe area around the village of Lympstone is a world renowned RAMSAR site on the Exe estuary which is visited by tourists and ornithologists from all over the world.

To develop LYMP_07 would isolate and fragment habitats, destroying vital wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. These areas include veteran trees and species rich hedgerows and runs contrary to PARAGRAPH 13.9.

LYMP_07 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development which would require residents to travel. People would need to travel far further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too steep and too far from a town centre for people to allow most people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The use of Exmouth facilities and services would lead to coalescence of Lympstone and Exmouth, contrary to POLICY OL05 of the local Plan. The Village of Lympstone and town of Exmouth have fought hard over decades to protect both settlements from coalescence.

Chapter ‘ Our outstanding landscape’

The following sites LYMP_07, GH/ED/72a and GH/ED/73 have been assigned in the local plan contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas.

The Exe estuary is an important ecological site with rare and protected species.

Full name: Christopher Wintrell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

Full name: Christopher Wintrell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: A fe

Full name: Lucy Tyrrell

Organisation (where relevant): Lympstone Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Compliance with the National Planning Policy Framework (NPPF, revised 12 December 2024) The plan does not enable the delivery of sustainable development in accordance with the NPPF, specifically paragraph 8, which defines three interdependent and mutually supportive objectives - economic, social and environmental. 8 a) an economic objective - “to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;” The plan does not identify sufficient land of the right type in the right place, nor does it identify or coordinate the provision of infrastructure. All the development in Lympstone is proposed to be located on agricultural land, which will impact the local economy. No new transport connections or infrastructure improvements sufficient to support the increase in population are planned. b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and The Plan does not meet the social objective of ensuring a range of homes to meet needs.

Lympstone parish requires 2-3 bedroom starter homes, ‘affordable’ for a young family on an average Devon salary, so that youngsters growing up in the area can remain here; as well as bungalows which meet the downsizing needs of our older population. The planning applications we have seen to date do not meet this housing requirement (3 bungalows are offered at GH/ED/72a). Services are at capacity, Lympstone’s GP surgery is full, ECC secondary school in Exmouth is full, therefore secondary school students will have to travel to Exeter. The A376 is the only A road between Exeter and Exmouth.

No new bus or road routes to Exeter are planned, nor any upgrade to carriage stock on the ALRUG railway line. c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.” Biodiversity net gain improvements are not able to be fully met on development sites in Lympstone due to the high existing biodiversity value of the land. Waste and pollution will increase as there is no evidence of water quality risk assessments for any of the sites - despite water pollution being a critical issue in Lympstone which is located on the Exe Estuary, a SSSI and RAMSAR site. Water quality here in Lympstone is intrinsically linked to flood risk, biodiversity, human health, and the local economy (tourism and shellfish business in Lympstone).

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

GH/ED/73: The Site selection report notes the close proximity and potential impacts on two grade II listed assets to the north, including the Gulliford Meeting Burial Ground – a heritage asset for which remoteness and tranquillity are a contributor to significance. We therefore request that the policy responds to address these issues, including by requiring a generous landscaping buffer to the northern boundaries of the site to mitigate impacts on these assets and their rural settings. This will ensure the policy is justified and consistent with national policy.

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.: GH/ED/73:

Suggested additional policy wording “Development should be appropriate to the rural setting and should conserve and enhance the settings of nearby designated heritage assets, including through a generous landscaping buffer to the northern boundary of the site”.

SD11

Full name: Nick Yeo

Organisation (where relevant): 3West Group Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

3West Group support Strategic Policy SD10 and specifically the proposed allocation of the Land at Gilbrook, Woodbury (Wood_10).

An outline planning application for up to 60 dwellings (application reference: 23/2166/MOUT) received resolution to grant planning permission, at the EDDC planning committee, held on the 19.11.2024.

The planning application site location plan is attached for reference.

The planning decision is pending agreement of a Section 106 Legal Agreement which at the time of writing is at an advanced stage with a planning decision expected to be issued during April 2025.

A reserved matters planning application has been prepared and is awaiting submission. As a result of the comprehensive programme of work undertaken in support of the planning submission and approval of the planning application by EDDC, the site is proven to be deliverable.

We can confirm that construction work is forecast to commence during 2026 (subject to the timely grant of reserved matters planning) and therefore the site is able to make a valuable contribution to EDDC's 5 year housing land supply.

The site remains a very good candidate for allocation in the emerging Local Plan, and this is supported by the technical work and masterplan's prepared to support the planning application.

Due to the imminent grant of Outline planning permission, we are able to demonstrate the deliverability of both sites to meet the Local Plan objectives. Furthermore, the site is able to make a meaningful contribution to EDDC's 5-year housing land supply.

We trust our comments will be fully taken on board and the allocation of the site is confirmed.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be available at the hearing session to provide further clarification or respond to any site specific queries from the Inspector or third parties.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
Please see attached representations.

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.: In order to address queries in relation to the delivery of this site.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): GB House and Son

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

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 emphasise the suitability and availability of our client's land in Woodbury for residential-led development and employment development.

Full name: Ollie Thorogood

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Jackson-Stops

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed Allocations in 'Local Centres' The proposed distribution of residential allocations across the five Local Centers are set out below:

[table mentioned can be seen in the attached PDF]

In the context of the other four settlements within the 'Local Centre' category, Woodbury is set to provide a much higher contribution of dwellings. The provision of 216 dwellings in Woodbury is more closely aligned to some of the expected delivery within some 'Main Centres', a higher category within the settlement hierarchy, notably Sidmouth which is expected to provide 172 dwellings, and Seaton which has a respective figure of 284 dwellings. www.carneysweeney.co.uk Whilst this can be explained to an extent by certain settlements having landscape and topographical constraints that limit the amount of growth, it provides an indication that Woodbury is among the most sustainable settlements within East Devon that can accommodate and deliver the development that is needed, where it is needed. We support the spatial strategy that seeks to accommodate development in Woodbury to meet local needs and those in the immediate surroundings.

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.: Woodbury is among the most sustainable settlements within East Devon that can accommodate and deliver the development that is needed, where it is needed.

We support the spatial strategy that seeks to accommodate development in Woodbury to meet local needs and those in the immediate surroundings.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Ollie Thorogood

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Jackson-Stops

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Introduction This representation is submitted in response to the East Devon Local Plan 2020-2040 Regulation 19 Consultation, on behalf of our clients, Jackson-Stops. Our clients are the advisors to the owners of land at Globe Hill, Woodbury, which is shaded in red on the Site Location Plan enclosed at Appendix 1. Whilst the site has not been identified as a potential allocation in the Draft Local Plan, the site lies adjacent to the west of Draft Allocation Wood_06. This representation should be read in conjunction with the following supporting drawings:

- Sketch Plan Previous consultation on the emerging Local Plan has taken place between January and March 2021, November 2022 to January 2023, and more recently between May and June 2024. During each of these consultation periods, additional housing sites have been submitted, assessed and since been proposed in this Regulation 19 Local Plan consultation. The site subject to this representation has not previously been promoted through the Local Plan process. Rather, our client's focus has been promoting the site subject to Draft Allocation Wood_06 which has been positively reviewed by Officers and Members of the Strategic Planning Committee, culminating in its draft allocation. Given the positive response to Wood_06, our clients wish to propose their adjacent land as suitable for development and deliverable within the plan period. The land can be brought forward at an early stage within the plan period to meet the objectives of Woodbury to support development "that meets local needs and those in the immediate surroundings". Significantly, Wood_06 was considered acceptable to be chosen as a draft allocation due to its proximity to shops and facilities in the settlement centre, as well as a primary school. Furthermore, the site was seen to have limited ecological and landscape impact. The same can be said for the site subject to this representation. www.carneysweeney.co.uk Policy Context for Plan-Making Provisions

for plan-making are set out within the NPPF and NPPG. Plan makers are required to take account of the following points when preparing their Local Plan: Under the transitional arrangements of the December 2024 NPPF, the new Local Plan will be considered under the provisions of the December 2023 NPPF. National Planning Policy Framework (December 2023) Paragraph 31 states that “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be ... focussed tightly on supporting and justifying the policies concerned and take account of relevant market signals.” Paragraph 35 identifies the tests of soundness as being: a) Positively prepared: As a minimum, seeking to meet the area’s objectively assessed needs and informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with sustainable development. b) Justified: An appropriate strategy based on taking account of reasonable alternatives and proportionate evidence. c) Effective: Deliverable, based on effective joint working on cross-boundary strategic matters, evidenced in a Statement of Common Ground. d) Consistent with national policy. Site Location The site is located at the western extent of the village of Woodbury, lying adjacent to the proposed allocation referenced Wood_06. The draft allocated site, Wood_06, also benefits from a resolution to grant planning permission, subject to the completion of a S.106 Agreement. It is therefore anticipated that Wood_06 will be developed in the short term, within the first 5 years of the Local Plan period. The site subject to this representation can be accessed directly from Wood_06 and is therefore an achievable and deliverable development site that can contribute to meeting housing needs in the short term.

www.carneysweeney.co.uk The site can accommodate circa 21 residential dwellings and a large area of open space providing informal recreational opportunities. This level of development is consistent with the level of growth envisaged in Local Centres. Woodbury itself is a prime settlement, capable of accommodating residential growth. It is stated in the Role and Function of Settlements Report, published by East Devon District Council, that Woodbury is one of 15 villages that “offer a range of accessible services and facilities to meet the day-to-day needs of their residents and nearby rural areas, with reasonable public transport”. The Report also found that Woodbury plays an important local role in the provision of employment and community facilities. The sustainability credentials of Woodbury are such that the Regulation 19 Draft Local Plan identifies the settlement as a ‘Local Centre’, meaning it is required to support development to meet the needs of the village and its wider network in the immediate surroundings. With this collated evidence, the Council seeks to allocate five sites in Woodbury, totaling around 216 new dwellings throughout the plan period.

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.: Allocate the site put forward by Jackson-Stops in addition to Wood_06

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Will Ridalls

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Simon Stokes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As we have set out above, we still consider the proposed housing provision is too low and the opportunity to bring sites forward that maximise the opportunity to deliver housing earlier in the Plan period should be further considered. As the Regulation 18 and 19 site selection processes have identified there is significant capacity at for a range of smaller sites to come forward across the identified settlements that can benefit from existing infrastructure and accessibility. Land north of Castle Lane, Woodbury (previously Wood_24)

Our client's site at Castle Lane, Woodbury represents such an opportunity which regrettably was not given proper consideration during the site selection process, largely because of the unduly negative and inaccurate site assessment. We firmly believe that the site was not given proper consideration. A number of previous representations have been made to the Council, including by the landowner Simon Stokes on the 26th June 2024 [in response to the further draft local plan consultation], planning agent David Seaton on the 11th January 2023 [responding to the Regulation 18 Consultation], planning agent Nicole Stacey on the 13th January 2022 [sent in light of Strategic Planning Committee meetings], and Simon Stokes, on the 27th September 2022 [sent in light of Strategic Planning Committee meetings].

These previous comments have each raised concerns regarding the site assessment exercise that the Council have undertaken, however, whilst some matters raised have been 'noted', they do not appear to have been taken into account in the site selection

report for Woodbury (SAL-048), dated February 2025. This report concludes that the site was not allocated due to the high/medium landscape sensitivity and other more preferable sites at Woodbury. This is strongly disagreed with, as set out below. The Site Selection report for Woodbury continues to repeat DCC Highway comments that have since been rebutted, stating that the site is “relatively remote” and “without the ability to link to the footway along Castle Lane”. Whilst the report includes a note regarding an opportunity for a link to Webbers Meadow, as has previously been promoted, the assertion of being relatively remote has not been addressed. The site clearly cannot be considered remote given it is surrounded by existing development to the north, west and south and is within easy walking distances to a range of services and facilities including the primary school (as shown in photo 1). We would also like to clarify that the link to Webbers Meadow can be readily implemented due to the landowner retaining full rights for vehicular and pedestrian access to this land (from the land north of Castle Lane). In respect of landscape, the report continues to describe the site as having only a limited context of built form provided by modern dwellings adjoining the western edge and low-density dwellings along north east of the site. This completely ignores the substantial holiday park to the south and downplays the presence of the existing adjacent land uses. This is a fundamental flaw in the site’s assessment and ignores its immediate context and overall relationship with existing development. It certainly is not accurate to describe the site (as the site selection report does) as a ‘promontory’ location, as it does not project beyond existing built form, for the reasons set out above. The landscape assessment also alleges there are “long distance views to the Grade I listed church and Exe Estuary”. As clarified in the previous representations, only the very top of the church tower can be seen from only a very small part of the higher (eastern) part of the site, not the church building itself. From the majority of the site, the church is not visible. You will note from the indicative layout previously submitted with the representations made on the 26th June 2024, that this eastern land could be delivered as open space. Therefore, this relationship is not considered to rule out the development potential of the site and could be easily addressed through a sensitively designed scheme. This landscape and heritage context could certainly not on the basis of the above be considered to have the high/medium landscape sensitivity that the report claims and would be more appropriately described as low. This is a critical matter because this inaccurate description of landscape sensitivity was directly specifically and solely identified as the reason for not allocating the site. On correction of this error the site becomes a clear opportunity to accommodate modest growth at Woodbury and removes any reason for not allocating the site. It is unfortunate then that the above landscape assessment errors have also been carried forward into the Sustainability Appraisal. In particular, the landscape impact of the site is considered to have a ‘major negative effect in contributing towards the achievement of the landscape objective’. If the assessment had been applied correctly this clearly would not have been the case and the site would have scored as a minor negative or negligible effect.

Similarly, it is considered that even a minor negative effect regarding heritage inaccurately describes the minimal visual relationship with the listed church, and negligible would be a more accurate reflection of impact. In respect of landscape, the report continues to describe the site as having only a limited context of built form provided by modern dwellings adjoining the western edge and low-density dwellings along north east of the site. This completely ignores the substantial holiday park to the south and downplays the presence of the existing adjacent land uses. This is a fundamental flaw in the site's assessment and ignores its immediate context and overall relationship with existing development. It certainly is not accurate to describe the site (as the site selection report does) as a 'promontory' location, as it does not project beyond existing built form, for the reasons set out above. The landscape assessment also alleges there are "long distance views to the Grade I listed church and Exe Estuary". As clarified in the previous representations, only the very top of the church tower can be seen from only a very small part of the higher (eastern) part of the site, not the church building itself. From the majority of the site, the church is not visible. You will note from the indicative layout previously submitted with the representations made on the 26th June 2024, that this eastern land could be delivered as open space. Therefore, this relationship is not considered to rule out the development potential of the site and could be easily addressed through a sensitively designed scheme. This landscape and heritage context could certainly not on the basis of the above be considered to have the high/medium landscape sensitivity that the report claims and would be more appropriately described as low. This is a critical matter because this inaccurate description of landscape sensitivity was directly specifically and solely identified as the reason for not allocating the site. On correction of this error the site becomes a clear opportunity to accommodate modest growth at Woodbury and removes any reason for not allocating the site. It is unfortunate then that the above landscape assessment errors have also been carried forward into the Sustainability Appraisal. In particular, the landscape impact of the site is considered to have a 'major negative effect in contributing towards the achievement of the landscape objective'. If the assessment had been applied correctly this clearly would not have been the case and the site would have scored as a minor negative or negligible effect. Similarly, it is considered that even a minor negative effect regarding heritage inaccurately describes the minimal visual relationship with the listed church, and negligible would be a more accurate reflection of impact. The 'smaller' nature of this site (with capacity to deliver 40 to 45 dwellings), combined with strong existing infrastructure links to the adjacent site to the west, and a landowner who is actively promoting the site for development, will mean this site can come forward quickly. This will support the effectiveness of the Plan, being a site that will be delivered early in the Plan period. This will create resilience for the Plan strategy and provides the Council with flexibility to support the delivery of larger sites like the proposed new settlement. It is also important to note that to date there have been no written objections regarding the site in the earlier emerging local plan consultations.

This is a clear positive which further supports allocation of the site. Paragraph 36 of the NPPF (2024) sets out the tests for soundness, which the plan must pass at examination. By allocating this site, it will make a meaningful contribution to housing in Woodbury, and assist the Council in meeting their duty for the Local Plan to be positively prepared, helping to meet the area's objectively assessed need.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We believe further growth at the identified settlements should be provided for through the allocation of further sites. This will underpin the Plan's strategy to ensure sufficient housing growth in the town throughout the Plan period, including at an early stage. The site at Castle Lane in Woodbury (Wood_24) is unconstrained and there are no impediments to its delivery and as such it can make an important contribution to the Plan. Policy SD11 should therefore be modified to include land north of Castel Lane, Woodbury (Wood_24) at as an allocation.

Full name: Fiona Cochrane

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Woodbury is a relatively small community and major development on the proposed scale (365 houses) is excessive. There are insufficient local facilities (1 small village shop, 1 primary school) to support this many new inhabitants so huge increase in the number of cars on the roads would result. Especially as the local buses are even less frequent than previously. Also the utilities infrastructure would need significant investment to cope, it is unlikely that this would happen.

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.: Fewer houses would reduce the pressure on utilities and transport infrastructure. Or significant investment.

Full name: Dave Jones

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Not compliant with the following:

Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1, SD10 and SD11 development from the Local Plan. South West Water demonstrably cannot be trusted to address the issues and even if they try, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, and add to sewage pollution of local rivers, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The sewage situation is so out of control it's actively harming local people and the natural environment. Allowing more development before this is fixed is completely unacceptable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy does not take into account the already acknowledged failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: EDDC has completely failed to act upon feedback given by local people and parish councils.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Alexis Anne Taylor

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
Thoughtful expansion.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Perhaps provide a good sized shop on tyhe Broadway site

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We reiterate our comments regarding the importance of providing buffer zones (for no development) to watercourses across sites in Woodbury.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Wood_09: This site allocation proposal has potential to harm the settings of grade II Oakhayes House, the grade I Church of St Swithun and an open green space that contributes to the character and appearance of the Woodbury Conservation Area. We acknowledge that there is now a resolution to grant outline consent, and we welcome parameters within the policy that respond to both the church and conservation area. However, we consider that development should also seek to conserve the setting of Oakhayes House, consistent with the site selection report and policies in the NPPF.

Wood_10: This site allocation has potential to harm the settings of grade II listed Gilbrook House to the north and Higher Venmore to the southwest. The policy should include provisions to conserve the settings of these heritage assets, consistent with the site selection report and policies in the NPPF.

Wood_16: Given that this site is also adjacent to the Conservation Area, should it contain the same provision as sites Wood_09 and Wood_10?

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.: Wood_09:

“Development should include public open space and Green Infrastructure links (including the areas of flood zone 3) through the site to provide opportunities for the

public to appreciate a key local landmark (Grade I listed Parish Church of St Swithun) and to conserve the setting of grade II Oakhayes House and the character and appearance of Woodbury Conservation Area.”

Wood_10: “The design and layout of development should reflect the key characteristics of Woodbury Conservation Area to the north and incorporate landscaping buffers to conserve the settings of grade II listed Gilbrook House and Higher Venmore.”

Wood_16: “The design and layout of development should reflect the key characteristics of Woodbury Conservation Area to the north.”

SD12

Full name: Dan Yeates

Organisation (where relevant): Savills

Other party name (if relevant): The Exeter Diocesan Board of Finance Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD12

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We object to draft Policy SD12 in its current form on the basis that insufficient allocations are included. As per our response to draft Policy SP02, the housing requirement should be increased and further allocations included within the plan, including at sustainable settlements such as Broadhembury. Broadhembury hosts the following which provide day-to-day services and facilities:

- Shop / convenience store
 - Post office
 - Primary school
 - Pub
 - Village hall
 - Children's play area
- As a result, Broadhembury is an entirely appropriate location for additional growth beyond that proposed. We specifically consider that the Land south of The Vicarage, Broadhembury (Brhe_07) should be included in the plan as an allocation to help support a potential increase in the overall housing requirement. The site has been assessed by the Council as part of the emerging local plan, and specifically through the HELAA process but was rejected in earlier stages of the draft local plan and not included as a preferred allocation in the Regulation 19 draft.

However, the site is available for development and therefore able to contribute given the increasing need for more land to be identified. The site benefits from access from Dukes Square, providing onward links into the village. The site falls within flood zone 1, and there are no environmental designations or constraints to development. our view Broadhembury is a sustainable location capable of accommodating a slightly higher level of growth than that already proposed through Brhe_09. Indeed, a second allocation in the village would provide more certainty in terms of delivery and market choice. Broadhembury, covered by draft Policy SD12, is a sustainable location capable of accommodating a second allocation in the village, and in our view the land south of The Vicarage (Brhe_07) should be included as an allocation to help accommodate a proportion of this growth.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Given their interest in Bhre_07 Board should be able to make their case.

Full name: Bob Nelson

Organisation (where relevant): Broadhembury Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD12

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Thank you for the invitation to respond to the Regulation 19 consultation on the draft Local Plan. The regulation requires that the consultation response is restricted to certain specific questions and we have addressed these below under the three objections. At the end of this submission we have also suggested alternative courses of action which we believe would satisfy the public good in a more effective way. This document contains eight pages and should be considered in its entirety. It forms an E mail attachment to localplan@eastdevon.gov.uk and will be served in hard copy by post to EDDC, Blackdown House, Border Rd., Honiton, EX14 1EJ. It will also be published on our web site: @broadhembury-pc.gov.uk Broadhembury Parish Council opposes the inclusion of site Brhe-09 for the development of ten houses in the draft Local Plan. [located at grid ref: ST 10039 04705. Lat long: 50.83485, - 3.27889].

Our opposition is for the following specific reasons:

- the plan as proposed constitutes ‘major development’
- the development on site Brhe-09 will cause harm to the character and appearance of the Conservation Area
- you have not exercised your duty to further the purposes of designation of the Blackdown Hills National Landscape in your site selection process

Major development

1.1 The National Planning Policy Framework states that; 'when considering applications for development within National Landscapes, permission should be refused for major development.... other than it can be demonstrated that the development is in the public interest....' [NPPF/ Dec '24/190]

1.2 Whether a proposal constitutes 'major development' is a matter for you, taking into account its 'nature, scale and setting and whether it could have significant adverse impact on the purposes for which the area has been designated or defined...' [NPPF/Dec'24/footnote :67].

1.3 You have argued [Q:23 /EDDC/ Major Development in National Landscapes/ Feb '25] in response to your own question: 'major development?' , your answer is: 'no, the location of the site is outside of the BHNL [Blackdown Hills National Landscape] and on the edge of the settlement.....' and in answer to Q:22: 'the scale of the development would be around 10% of the current number of dwellings in the main village'

1.4 It is our belief that that these arguments are inconsistent with national policy and not justified. We acknowledge that the site is not within the National Landscape but nevertheless you have proceeded to evaluate it based on faulty evidence of what constitutes major. The conclusion reached to allocate housing on site Brhe-09 over other alternatives is based on inadequate analysis and inconsistent judgements which are not robust

1.5 Our reasons are: the definition of ‘major’ is normally considered to be ten or more houses and a site greater than 0.5 hectares. The site is for ten houses and the plot is 0.8 hectares.

1.6 Notwithstanding these points your estimation that ‘the scale of the development would be around 10% of the current number of dwellings in the main village’ is misleading. To arrive at 10% requires a denominator of 100 houses. This is only possible if houses are included outside the proposed Built Up Area Boundary and the extant Conservation Area. In fact it is only possible if houses are included outside the area within which housing would be permitted under the Villages Plan for reasons of sustainability. In a complementary document [Settlement Boundaries Evidence paper 22 Nov 2024 SPC map p 21] you have specifically excluded some houses because they are ‘not built- core settlement’ but you have then included them to justify adding to the built core to make this case. This is inconsistent and misleading.

1.7 We believe that a justifiable figure constitutes 30%-35%, which using your own criterion would rule out development. We therefore believe it should be ruled out by virtue of scale. We address location and scale of development and the effects on the special qualities of the Protected Landscape under different sections below.

1.8 The decision to reinstate the Built Up Area Boundary is not contested in principle but the proposal to redraw it specifically to include the site to which we are opposed is unjustified. It follows no discernible land feature, opportunistically dissecting an open field which you propose elsewhere to demark by a hedge. Its sole purpose is to remove the site from ‘open countryside’ policies and therefore make the development conditions and criteria a lower hurdle for building.

Broadhembury Conservation Area

2 Broadhembury Conservation area was designated before 1974 and reappraised in 1999 by EDDC. It comprises 36 individual Listed Buildings. The statutory list refers to Broadhembury as: ‘an outstanding unspoilt estate village of thatched houses’ and the

appraisal states: ‘there is little doubt that it has few equals within East Devon, indeed within the county as a whole...’ [para 11.1/ EDDC Appraisal 1999].

2.1 The character and appearance of the Conservation Area is predominantly linear, a wide street with street-fronted thatched cob cottages. The overall effect is; ‘unusually complete and timeless’ in which the ‘curving alignment of frontages provides a strong sense of enclosure and an intricate and varying sequence of views...’. [ref ditto]. Other characteristics include its rural character, its loose structure with views out to the surrounding countryside between buildings, the extent to which the surrounding countryside extends into the village, views to the church from the wider landscape and its homogenous character due to it being an estate village

2.2 Given the identified character and appearance of the village as stated in the Conservation Area Appraisal, development of site Brhe-09 comprising 10 dwellings would not conserve the valued characteristics of the village. It is unlikely that ten houses on a plot of 0.8 hectares could replicate the character and form of village as described in the Conservation Area Appraisal and Village Design statement (2010). The Conservation Area is only 7.2 hectares to which an incongruous addition of 0.8 hectares will be added on a slope rising towards the Conservation Area.

2.3 In fact the nature of development proposed states: ‘predominantly two storey, possibly some 2.5 and 3.0 storey where appropriate...’ [EDDC Topic Paper SAL-048, Major development in National Landscapes / Feb ‘25/8.1 criterion 5] would be incongruous by nature and inappropriate in setting.

2.4 We submit that the allocation of development on site Brhe-09 would be in conflict with Policy OL 02 National Landscapes, Policy OL04 Areas of Strategic Visual Importance and Policy HE03 Conservation Areas. Other site options within the village would in our view give rise to less harm. (see 5.0 Alternatives below). We also believe that it conflicts so extensively with EDDC’s Heritage Strategy 2019-2031 that the reasons are too extensive to elaborate in this submission

4 The Blackdown Hills National Landscape

4.1 The Levelling-up and Regeneration Act (2023) [LURA] imposes a duty on ‘relevant authorities’ to ‘seek to further the purposes of a protected landscape’ in all actions which may ‘impact or have an influence on the purpose of’ the BHNL. The primary purpose is to ‘conserve and enhance natural beauty’. This duty applies to functions outside of a Protected Landscape which may have an effect on land within the Protected Landscape. (usually referred to as ‘the setting’) as set out in para 12.8 of the Local Plan.

4.2 Guidance for ‘relevant authorities’ (which includes us as a Parish Council as well as you a District Council) poses the question: ‘could the measures contribute to the conservation and enhancement of the protected landscape’s wildlife, ecological value and quality, geological and physiological features, water environment, cultural heritage, dark skies, tranquillity, ...and landscape character for which the area was designated...’[Guidance for relevant authorities ..etc 16 Dec 2024)/ DEFRA]

4.3 Your legal duty to ‘seek to further’ these aspects of the Protected Landscape in respect of the site proposed is addressed by your answers to questions 8-23 section 8.1 of SAL 048 Major Development in National Landscapes Reg 19 version Feb 25. In response to Q19 (is there a significant impact on the purposes for which the area has been defined?) you have answered; ‘no’.

4.3 We are advised that the assessments which have led to the identification of and allocation of site Brhe-09 do not adequately explore the special qualities of the BHNL, and the expression of special qualities at the local level. The evidence relied upon in the assessment [East Devon Local Plan 2020-2042 Site Selection Report Broadhembury Feb 2025] and the judgements reached therefore lack robustness. The Site Selection report does not specifically address how each site would further the superordinate purpose of the BHNL ie: to conserve and enhance its special qualities. It is our view

therefore that the assessment you have undertaken does not therefore meet the test of ‘reasonable and proportionate consideration’. You will know that the Natural England guidance that you quote in support of criteria 12-17 of your document [reference above] is out of date. The plan is in our view not legally compliant. We would remind you that ‘seeking to further’ something is a much more stringent test in law than simply ‘having regard to’ something as previously required under the CRow Act (2000)

4.4 Any assessment of effects on ‘natural beauty’ requires an understanding of the special qualities of the landscape as set out in the Blackdown Hills Management Plan in this instance. Your Authority along with the Somerset unitary Authority and Devon County Council and others have delegated the production of the Management plan to the Management Partnership of the Blackdown Hills National Landscape on which you are represented. You will know that the extant plan (2019-24) has had its life extended temporarily by DEFRA, and that a revised plan is in the final stages of consultation. The draft has been approved by all relevant authorities and will be published before the Local Plan is ‘made’ so we would urge you to use this as the source document. Failing this we would encourage you to reference the detailed statement of intent dated 1989 by the Countryside Commission.

Reasonable Alternatives

5.0 Notwithstanding the points above we are mindful of the pressures for both affordable and commercial housing and that the opportunities in East Devon are limited by the high proportion of land which is Protected Landscape. It is clearly in the public interest to find sites for development.

5.1 We have offered and supported a more suitable alternative site close to the village of Broadhembury. This is an Exception site to the West of the village [Planning Application ref 23/2538/OUT, also referred to as site Brhe-04]. It will have less impact on the Protected Landscape and Conservation Area, provide more affordable housing as a proportion of the whole (four in six rather than two in ten) and we have had significant discussions with the landowner about the ways in which the purposes of the Protected Landscape could be enhanced. It also meets the need identified in our most recent housing survey. You have indicated in discussion that you are ‘minded to approve’ the outline application and we would encourage you to make the decision without further delay so that identified housing needs can be met.

5.2 You have dismissed sites BRHE- 05 and 07 as ‘within the setting of the Grade 1 Listed church and development would have a significant impact’ [page 476/ Sustainability Appraisal report Feb 25]. Furthermore you have dismissed sites Brhe- 04,05 and 07 because: [they]...’ lie within the National Landscape so any development is considered to have significant adverse effect...’. You argue that ‘the other sites (presumably Brhe- 04 and 09) are close to but do not directly impact upon the Grade II Listed buildings...’ [ref ditto].

5.3 Clearly this is true of Brhe-04 but is not the case of Brhe-09. To amalgamate the two sites in one impact assessment is inconsistent. We would submit that your site assessment process is faulty and has not been conducted with a view to ‘making the plan more sustainable by identifying the plan’s significant effects and ways of minimising its negative effects ‘ [ditto para 1.2] because there are perfectly viable alternatives. Our advice is that sites Brhe 05, 07 and 09 all effect the setting of Listed Buildings, including the church in identical ways by virtue of proximity (they are all within similar distances), setting (on ground which affords views of the church) and nature (the design and style of habitation would be inconsistent with and equally close to or within the Conservation Area).

5.4 More generally some of your existing policies make it difficult to comply with recent legislation. For example your policy to group housing within approx. less than 1 km from services rules out many adjacent hamlets and villages within or even close to the National Landscape where development could be proposed. The NPPF (Dec 24./para 83) states: ‘where there are groups of smaller settlements, developments in one village may support services in villages nearby.’

5.5 We think that a reassessment of EDDC policy in line with NPPF could release other potential sites. We have previously made this and other points to you in our written submissions (eg: Nov 24, submission to EDDC Strategic Planning Cttee)

Process

6.0 As permitted under the regulations in law which determine consultation at this stage we wish to be informed when the Local Plan is formally submitted to the Planning Inspectorate and when the Enquiry takes place. We give notice that we shall be submitting a technical paper to the Enquiry and will be represented if the Sec of State holds sessions in public.

Conclusion

7.0 We do not believe that the plan has been positively prepared, nor are the proposals justified or consistent with national policy and legislation and are therefore unsound. There are more viable smaller-scale options which would have local support, further the purposes of the National Landscape and protect the Conservation Area from harm. The points made in this submission are consistent with those in our letters to you dated 20th Jan 2023 and Jan 21 but unacknowledged.

SD13

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD13

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To clarify pedestrian access requirements, DCC requests that the final paragraph relating to the Char_04a allocation be amended to read: “Opportunities to provide a connection for residents to Public Right of Way Chardstock Footpath 30 are encouraged and expected along with clear pedestrian links to tie into the existing footways.”

Full name: Laura Polley

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Summerfield Homes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD13

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: [To be read with entry linked to Laura Polley (Greenslade Taylor Hunt) including uploads of Highway and Transport Review, Landscape and Visual Baseline, and Illustrative Framework Plan.] This representation is submitted on behalf of our clients, Summerfield Homes Ltd in connection with the Regulation 19 Local Plan Consultation. Summerfield Homes are a local housebuilder who have an Option Agreement to develop the land at Green Lane, Chardstock. Summerfield Homes submit this letter in support of the allocation, subject to modifications, of land within Chardstock (CHAR_04a) contained within policy SD13 of the East Devon Local Plan 2020 to 2042 which was published in February 2025. Strategic Policy SP01 identifies Chardstock as one of the Service Villages and will allow for limited development of the settlement. Strategic Policy SD13 proposes to allocate Land off Green Lane, Chardstock (Char_04a) for around 30 dwellings. The policy requires landscaping to include provision of appropriate boundary screening in respect of long-distance views to and from the Blackdown Hills National Landscape area. The policy encourages opportunities to provide a connection for residents to Public Right of Way (PRoW) Chardstock Footpath 30. The Illustrative Framework Plan which accompanies this submission shows access from The Half Moon Road to the south of the site with attenuation features and landscaping around the site entrance. Higher development densities are proposed on the southern part of the site with densities decreasing towards the northern extent of the site. The plan incorporates public open spaces throughout the site and green breaks distributed throughout the development. The northern part of the site could be used for strategic landscaping, open space and Biodiversity Net Gain (BNG), although the final layout is still to be confirmed. Summerfield Homes strongly support the allocation of Char_04a for the development of around 30 homes, subject to modification to include

additional land. It is recommended that the policy is amended to include the adjoining field parcel to the north, over which Summerfield Homes also has an Option. Despite the geographical extension of the policy to include northern land parcel, Summerfield Homes Ltd proposes to maintain the proposed number of dwellings at around 30. The inclusion of additional land will allow for a lower density of development, more in-keeping with local and landscape character, and the provision of enhanced landscaping and public open spaces. The additional land would also allow for a connection into Green Lane to be considered as encouraged by the emerging policy. This letter is accompanied by an illustrative framework plan which shows how the site could be developed to provide around 30 homes over the wider site area. The masterplan is landscape led and has formed following extensive studies and advice from landscape experts. The plans are at an early stage but nonetheless demonstrate how the allocation could be developed, resulting in a higher quality development and without resulting in undue landscape harm. The submitted landscape visual baseline assesses the key visual receptors and highlights recommendations to mitigate any landscape impact. The assessment confirms that, due to the site being outside of any national or regional designations, and being free from prominent landscape features, it would be deemed suitable for accommodating development, providing that mitigation measures are incorporated to assimilate the development within the surrounding area. The visual baseline assessment summarises that, whilst the site could be glimpsed from some higher value receptors, along PRoW and Bridleway routes contained within the Blackdown Hills National Landscape area to the west, the area is intersected by areas of existing tree and hedgerow planting forming part of the field boundaries and lane edges throughout the surrounding context. The development of the site would be viewed in the context of the existing village, with the built form making up the wider village prominent in the foreground of the glimpse views towards the site. The proposals look to add small areas of development to the northern field. This would be seen as negligible in the context of the Char_04a proposed allocation of the site, with the mitigation proposals being effective in ensuring the development is sufficiently landscaped to assimilate into the surrounding context. The emerging illustrative layout seeks to introduce low - medium density residential development within the site area. Illustrative proposals show site boundaries are being reinforced with planting, both to increase biodiversity value and to soften views onto the site. The site would benefit from the introduction and reinforcement of north-south green infrastructure breaks, assisting in layering the landscape as the development moves to a higher elevation, helping to mitigate wider views, and assimilate the development within the landscape. As required by Strategic Policy SD13, the initial layout shows a development of around 30 dwellings with extensive landscape planting and a connection into Chardstock Footpath 30. This landscaping and connection into Chardstock Footpath 30 could be made possible through the inclusion of the additional land. The submission is also accompanied by a highways technical note prepared by SLR which further supports the allocation of the

site for the development of around 30 homes. The document confirms that the site is within an accessible location with various local services and facilities within walking and cycling distance of the site, including a school and a shop. Chardstock therefore represents a sustainable location for the development of new homes. The proposed access plan demonstrates that vehicle access to the site can be achieved with an acceptable geometry including visibility splays in line with the speed limit.

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.:

Summerfield Homes strongly support the allocation of land at Green Lane, Chardstock and emerging policy SD13 for the development of in the region of 30 dwellings subject to the recommended modification. Summerfield Homes propose to include the adjoining land to the north of the emerging allocation, to enable the development of a higher quality scheme, with housing densities more in-keeping with local character, and enhanced public open spaces, landscaping and habitat creation as shown on the accompanying framework plan. The northern field has not been included in the emerging policy due to the Council's concerns over the potential adverse landscape impact. This has now been reviewed in detail and disproven through this representation, the accompanying plan and the landscape baseline assessment. Therefore, Summerfield Homes recommends this modification to policy SD13 to facilitate the delivery of a high-quality, in-keeping, and locally informed development that reinforces its sense of place whilst securing a more efficient use of land. This modification will ensure the soundness of this emerging policy.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Submitted to enable Summerfield Homes to present their case at a hearing in support of the allocation of the land over which they have an Option Agreement to develop and to share with the Inspector the work they have instructed in relation to landscaping, highways and drainage.

If the files uploaded need to be in the public forum in order to be discussed as part of the hearing then please contact us to discuss.

Full name: Laura Polley

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Summerfield Homes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD13

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.: Please see accompanying statement

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.: Please see accompanying statement

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.:
Please see accompanying statement

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see accompanying statement

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To enable Summerfield Homes to present their case at a hearing in support of the allocation of the land over which they have an Option Agreement to develop and to share with the Inspector the work they have instructed in relation to landscaping, highways and drainage.

If the files uploaded need to be in the public forum in order to be discussed s part of the hearing then please contact us to discuss.

Full name: Carole Crandon

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD13

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This does not consider the lack of infrastructure in the village or the detrimental effect on the elderly population. It equates to a 14% increase in population which cannot be supported by a village of this size.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The assigned area is green fields which would be lost forever alongside the wildlife which inhabits the area. England is already one of the most severely nature depleted in the world with only 53% of its biodiversity remaining.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details 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 road into the village is too narrow to accommodate more traffic. Following such a development the additional vehicles using the fragile road system would make living in the village intolerable. The village is only able to sustain the shop due to the support of the villager both practically and financially. If they withdraw their support or the Post Office no longer has a counter there the shop will need to close.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There is an empty public house that is rapidly deteriorating, it would make far more sense to develop this land. There is also some derelict industrial units that could similarly be used if further land was required.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Such a population increase would make the road into the village unusable for local people to walk along. This includes many dog walkers and parents taking their children to school.

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)

SD14

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD14

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To clarify access requirements, DCC requests that an additional paragraph be added to the text relating to this policy: “Access considerations for development proposals may need to consider the proposed new community to the east and alterations to discourage additional vehicular use on Bishops Court Lane.”

Full name: Nick Yeo

Organisation (where relevant): 3West Group Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD14

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

[Summerfield Planning on behalf of 3WestGroup] The representation is accompanied by a copy of the Regulation 16 Consultation response and objection to the Clyst St Mary and Sowton (Bishops Clyst) Neighbourhood Plan (Modification Proposal) (hereafter the "Neighbourhood Plan"). That representation is provided Appendix A and should be read in conjunction with this submission. The response to the Regulation 16 Consultation demonstrates that the proposed allocation of Strategic Environmental Assessment (SEA) Option 3 (sites Sowt03 and Sowt11), as proposed by Policy BisC12 'Land East of Clyst St Mary' in the draft Neighbourhood Plan, is fundamentally flawed and completely unsupported by evidence. This includes evidence prepared by the Parish Council's specialist consultant and appointed consultants AECOM. That evidence demonstrates that SEA Option 4 (sites Sowt03 and Sowt09) is the appropriate strategy for development at Clyst St Mary. Any other conclusion ignores the available evidence, and no credible or reasonable explanation or justification has been provided to support an alternative strategy. The rationale for the allocation of sites SEA Option 3 was predicated on a misplaced belief that suitable access cannot be provided to site Sowt09 (land at Bishops Court Lane) and that the delivery of a proposed link road between the A3052 and Bishops Court Lane will be provided as an integral part of proposed allocation site BisC12. It should be noted that the consideration of the current planning application for site Sowt09 (Application Reference: 23/1948/FUL) has confirmed that the Local Highway Authority Devon County Council (LHA) does not agree with the Parish Council's conclusion regarding the highway impacts of the development of that site. In fact, there are no reasons to object to the development of the site on highway grounds. It has also been confirmed at both the Regulation 14 and Regulation 16 stages of the preparation

of the Neighbourhood Plan that the LHA does not support the link road proposed as part of site BisC12. The LHA response to the Regulation 16 Consultation is provided in Appendix B to this representation. This response confirms that the LHA does not support the provision of the proposed link road due to the potential for unacceptable road safety risks, with the link inadvertently creating a vehicular route for through traffic between the A3052 and A30 Exeter Airport junction. This may lead to significant volumes of traffic attempting to turn right from the A3052 into the proposed allocation. The LHA go on to advise that the likely increase in traffic flows should the vehicular link to Bishops Court Lane be provided (and the likely use of the road by traffic accessing the business park and ‘rat running’) could raise material concerns regarding the suitability and safety of the access’s operation on the A3052. National policy and guidance confirm that neighbourhood plans must be underpinned by evidence that supports and justifies their policies. The inclusion of site BisC12 in the Neighbourhood Plan, without supporting evidence and/or justification, means that it has not been prepared in a manner that aligns with national planning policy. Therefore, the Basic Conditions have not been met. While this is a matter that 3West considers should be assessed and scrutinised in detail through the Independent Examination of the Neighbourhood Plan, it is also highly relevant to the emerging Local Plan. 3West objection to Strategic Policy SD14 The issues outlined above (and in Appendix A) are relevant to the Regulation 19 consultation because Strategic Policy SD14 of the emerging Local Plan defers responsibility for meeting the identified need for future residential development at Clyst St Mary to the Neighbourhood Plan. It should be noted that Strategic Policy SD14 is the only residential allocation related policy that proposes to defer responsibility for meeting future needs to a neighbourhood plan. Given that the Neighbourhood Plan in question has not been yet progressed to Independent Examination (and there is no indication at this stage that it will be found to accord with the Basic Conditions and other requirements and progress to Referendum and then be approved at Referendum and Made) this approach is considered to be inappropriate. It is clear that limited weight should be afforded to the emerging Neighbourhood Plan at this stage. It is self-evident that in the event that the Neighbourhood Plan does not progress to being Made (which to confirm 3West consider there are clear reasons why in its current form it should not do so) then Clyst St Mary will be left without any provision for planned growth to meet needs for new homes, including affordable housing. No explanation or justification is provided in the emerging Local Plan for why this approach is considered to be an appropriate approach to strategic planning. Furthermore, if Strategic Policy SD14 were to be retained in its current form, it would effectively be endorsing the proposed allocation of a site that (for the reasons explained above and further in Appendix A) is not supported by evidence and is therefore unjustified. The proposed allocation is also very unlikely to be deliverable due to the lack of support from the LHA for the proposed link road, which forms an integral part of the justification for the allocation. The objection from the LHA and its clear implications for deliverability of development at

Clyst St Mary should not simply be ignored by the emerging Local Plan process. It is also relevant that the support in the emerging Local Plan for the Neighbourhood Plan's proposed allocation at Clyst St Mary runs a significant risk of undermining the strategy set out in Strategic Policies SP01 'Spatial Strategy' and SP02 'Levels of Future Housing Development' of the emerging Local Plan. These policies set both the level of new development required to address housing needs and the distribution of that development across the district. Strategic Policy SP01 recognises the importance and need for 'limited development' at the identified Service Villages, including Clyst St Mary. This supports the emerging Local Plan's Objective 11, which seeks to support villages and protect and enhance the facilities and services they offer. The emerging Local Plan confirms that the identified Service Villages are those settlements with good local facilities, providing essential services and infrastructure for their immediate rural areas, and supporting more localised, sustainable development. This approach accords with the National Planning Policy Framework (Paragraph 83), which advocates the promotion of sustainable development in rural areas by locating housing where it will enhance or maintain the vitality of rural communities. It specifically states that planning policies should identify opportunities for villages to grow and thrive. The doubts about the deliverability of the Neighbourhood Plan's proposed allocation at Clyst St Mary must call into question whether the emerging Local Plan's spatial strategy, as it relates to that particular settlement and with it the provision of sufficient homes across district, is deliverable. A failure to deliver this element of the strategy will mean that the identified need for new homes, including affordable homes, would not be met at Clyst St Mary. Accordingly, 3West considers that the emerging Local Plan fails the tests of soundness on the basis that, with the inclusion of Strategic Policy SD14, it is not justified, effective, or consistent with national policy. Proposed allocation of Site Sowt_09 (Land at Bishops Court Lane) For the reasons outlined above 3West considers that Strategic Policy SD14 should be replaced with a policy that allocates sufficient land to accommodate at least 72 dwellings on sites at Clyst St Mary that are supported by evidence, including site assessments and site selection evidence prepared by EDDC and for the purposes of preparing the Neighbourhood Plan. Alternatively, the emerging Local Plan should include a further allocation at Clyst St Mary to ensure that the 'minimum' requirement for 72 new homes over the plan period will be met. Either approach will ensure that new homes to meet identified needs are delivered in a settlement which is in a highly sustainable location with excellent links to the strategic highway network and the city of Exeter to the west. It should be noted that separate representations made on behalf of 3West by consultants Savills have raised significant issues regarding the proposed approach to the progress of the emerging Local Plan and whether it can even proceed under the transitional arrangements. These representations highlight that the proposed level of housing proposed exceeds the suggested minimum requirement by less than one dwelling per annum. Whilst this representation does not repeat the other submission made on behalf of 3West, the fact that EDDC have not allocated additional

sites over and above the perceived minimum requirement supports a proposition that (in the event that the Local Plan does indeed proceed as proposed) additional sites are allocated for the development of new homes in the most sustainable locations, including Clyst St Mary. As Appendix A confirms, the available evidence indicates that the most appropriate locations for future development at Clyst St Mary are those set out in SEA Option 4 (sites Sowt03 and Sowt09). Specifically, this was confirmed through a review of the following documents which are discussed in detail in Appendix A: ? Site Options Assessment Bishops Clyst Parish Council – prepared by consultants AECOM published on the Parish Council’s website here: <https://www.bishopsclyst.org.uk/wp-content/uploads/2022/05/220510-Bishops-Clyst-Site-Options-and-Assessment-Final-Report.pdf> ? Site Residential Selection Process Report June 2022 – published on the Parish Council’s website here: <https://www.bishopsclyst.org.uk/wp-content/uploads/2022/06/Bishops-Clyst- Site-Residential-Selection-Process-Report-9Jun22.pdf> ? Site Consultation Report September 2022 – published on the Parish Council’s website here: <https://www.bishopsclyst.org.uk/wp-content/uploads/2022/10/CSMSNP-Site-Consultation- Report-September22.pdf> ? Strategic Environmental Assessment for the Clyst St Mary and Sowton Neighbourhood Plan (SEA) – prepared by consultants AECOM published on the Parish Council’s website here: https://bishopsclyst.org.uk/wp-content/uploads/2024/11/241113-Clyst-St-Mary-and- Sowton-NP_SEA-Environmental-Report_v3.0.pdf It should also be noted that site Sowt_09 was identified as preferred option by EDDC in the emerging Local Plan at the Regulation 18 stage. This is confirmed at Page 96 of the following document: <https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan-2020-2042/draft-local-plan- consultation-nov-2022-to-jan-2023/> The ongoing process of the determination of the current full planning application for the site (Application Reference: 23/1948/FUL) has confirmed that site Sowt09 is deliverable and that there are no technical reasons why the site could not be developed. This includes confirmation from the Lead Local Flood Authority that the principles of the drainage strategy for the site are acceptable (with the inclusion of an appropriately worded condition) and from the LHA that they have no objections on highway grounds. The Site Location Plan for site Sowt_09 accompanies this submission. A full set of technical reports and consultation responses are available on the planning application file and copies can be provided on request. Conclusion This representation is made on behalf of 3West Group in response to the Regulation 19 Consultation on the East Devon Local Plan 2020 to 2042. For the reasons outlined above, 3West object to Strategic Policy SD14. The policy’s deferral of responsibility for allocations to meet the identified need for new housing to the emerging and uncompleted Neighbourhood Plan (and with it the endorsement of a flawed approach to plan making and in particular site selection) means that this element of the emerging Local Plan is considered to fail the tests of soundness.

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.:

3West considers that to address this issue Strategic Policy SD14 as currently drafted should be removed from the emerging Local Plan and replaced with a policy that allocates sufficient land to accommodate at least 72 dwellings on sites at Clyst St Mary that are supported by evidence. Alternatively, the emerging Local Plan should include a further allocation at Clyst St Mary to ensure that the 'requirement for 72 new homes over the plan period will be met. As the available evidence, including site assessments and SEA and the ongoing determination of planning application reference 23/1948/FUL, have demonstrated that site Sowt09 (land at Bishops Court Lane) is deliverable and that there are no technical reasons why the site could not be developed. Accordingly, 3West recommend that Sowt_09 is allocated for future development

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To discuss the issues raised in the representation with the Inspector and Local Planning Authority and to provide further clarification and/or respond to any site specific queries from the Inspector, Local Planning Authority or third parties.

Full name: Nick Yeo

Organisation (where relevant): 3West Group Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD14

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: See accompanying representation.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See accompanying representation.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See accompanying representation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See accompanying representation.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To discuss the issues raised in the representation with the Inspector and Local Planning Authority and to provide further clarification and/or respond to any site specific queries from the Inspector, Local Planning Authority or third parties.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD14

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be able to address queries regarding the deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD14

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
See attached representation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It will be important to have the opportunity to participate in order to address any queries which might arise about the ability of development proposed under this policy to be delivered.

Full name: Oliver Keates

Organisation (where relevant): OBK Land and Planning Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD14

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As background and context for this submission, CSL have an interest in the site at Sidmouth Road, being the southern part of the Proposed Area for Development under Policy BisC12 – land east of Clyst St Mary - in the Submission Version of the Neighbourhood Plan for Bishops Clyst Parish. As such, CSL supports this site at BisC12 in the Neighbourhood Plan, as shown on Map 9 for residential development to provide a mix of housing. I support this policy so far as it seeks to accommodate “at least 72 dwellings” in Clyst St Mary. That this states that this is a minimum requirement as regards the number of dwellings and that this will need to come forward specifically in the village of Clyst St Mary is important. As noted above, the Neighbourhood Plan for Clyst St Mary is well advanced, being at the Submission Version stage, and the site at Sidmouth Road referred to as BisC12 in the Neighbourhood Plan has been included in all previous iterations of the plan, it would appear to be sensible and logical to include this site as an allocation in the East Devon Local Plan. On this basis, the Local Plan would reflect the wishes of the local Clyst St Mary community, and the two plans would be consistent with one another.

A date of 2030 is suggested for development to come forward through the Neighbourhood Plan process – given the advanced nature of the Neighbourhood Plan and willingness of CSL to progress a planning application for this site, this date could be changed to 2028.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

SD15

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD15

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To clarify requirements, DCC requests that an additional paragraph be added to the text relating to the Dunk_05 allocation: “The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.”

Full name: Neal Jillings

Organisation (where relevant): Summerfield Homes Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD15

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

We support the principle of providing new homes in the villages in the plan area and, in particular, land at Broomfields, Dunkeswell. The policy should refer to 'around 43' rather than being specific on the precise number of dwellings.

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.: insert the word 'around' between 'for' and '43'

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: We are keen to support the delivery of this allocation (as set out in the attached)

SD16

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Please see attached representations.

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.: In order to address queries relating to the deliverability of this policy.

Full name: Sue Cooper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Support for Policy SD16 and the findings of the background evidence reports SAL-001, SAL-002, SAL- 003 and SAL- 004 and SAL-015 Site selection report for East Budleigh. The site has been identified as suitable, available, achievable in the HELAA; in a suitable location; not already allocated in a ‘made’ Neighbourhood Plan; and not already have planning permission. However as the development would constitute ‘major’ development (as defined by the local authority according to the NPPF) in a National Landscape, to justify the “exceptional circumstances” for allocation the Policy to be sound should also stress the need to ensure affordable housing is provided to meet the identified needs of the village. Given the sensitivity of the site it is welcome the policy recognises a high quality development scheme is required it is suggested a masterplan is provided by the developer prior to planning permission being granted to enable consultation on a preferred locally distinctive and high quality design with the Parish Council and residents to ensure planting and open space provision is located to minimise the impact on the landscape, Syon House and to protect the amenity of the occupiers of adjoining residential properties on Frogmore Road. This in accordance with Strategic Policy DS01 of the Local Plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A high-quality and locally distinctive development scheme is required for this prominent site noting its location in the East Devon National Landscape area and proximity of the Syon House as

a non-designated heritage asset. Crossing provision over the B3178 should be provided for pedestrians and overhead wires across the site should be relocated underground. New and existing planting and open space should minimise the impact on the landscape, Syon House and protect the amenity of the occupiers of adjoining residential properties on Frogmore Road. Prior to planning permission being submitted it is expected the developers will provide a masterplan for consultation to the Parish Council and residents (particularly the immediate neighbouring properties,) to allow input into the design for the site. The provision of affordable housing to meet the identified needs of the village will be required.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Kurowski

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The proposed East Budleigh Site is outside of the Built-up Area Boundary in the Neighbourhood Plan (Made and Approved) contrary to SP03, SP05 and SP06. The proposed development needs to be only affordable housing but there are minimal employment opportunities, ie, a volunteer-run community shop, a volunteer-run pub, a church and a school so this is not a sustainable development contrary to SP01. The current infrastructure, ie, pedestrian, cycling and vehicular access, is inadequate in and around East Budleigh and this proposed development will exacerbate the problems close to the Lower Otter Nature Reserve contrary to SP07. East Budleigh and the River Otter estuary are within a National Landscape. The proposed site is adjacent to the Lower Otter Nature Reserve which is nationally important, is still developing and is designated a site of Special Scientific Interest (SSSI) - the site development will not enhance the NL and is contrary to OL02, PB01 and PB02 and will fail to meet PB05. The proposed development will impact the scenic quality of the district and the view to the iconic Syon House contrary to OL04.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed East Budleigh site (Ebud_01) is within the new settlement boundary shown in this proposed plan, hence meeting SP03, SP05 and SP06, however it is outside the Built-up Area Boundary in the Neighbourhood Plan for East Budleigh with Bicton (Made and Approved). The proposed site is on farmland and near Flood Risk 2/3 areas.

The proposed development (Ebud_01) needs to be only affordable housing but there are minimal employment opportunities, ie, a volunteer-run community shop, a volunteer-

run pub, a church and a school so this is not a sustainable development contrary to SP01.

The current infrastructure, ie, pedestrian, cycling and vehicular access, is inadequate in and around East Budleigh and this proposed development will exacerbate the problems as Frogmore Road is a very narrow road close to the Lower Otter Nature Reserve contrary to SP07. Access to the main village will require crossing the busy B3178.

East Budleigh and the River Otter estuary are within a National Landscape. The proposed site is adjacent to the Lower Otter Nature Reserve which is nationally important, is still developing and is designated a site of Special Scientific Interest (SSSI) - the site development will not enhance the NL and is contrary to OL02, PB01 and PB02 and will fail to meet PB05.

The proposed development will impact the scenic quality of the district and the view to the iconic Syon House contrary to OL04.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: If the proposed site (Ebud_01) is developed it should be only affordable housing or small units suitable for first time buyers. A safe crossing method including pedestrian paths from the site to the main village must be provided.

An alternative location is proposed as per the attached diagram - this site, on the B3178 behind Collins Park, potentially would provide safer access onto the B3178. There is an existing footpath from the B3178 adjacent to this alternative location that gives safer access to Middletown Road and to the village facilities. This part of the B3178 is relatively flat and would provide better access to the B3178 than from Frogmore Road from the proposed East Budleigh site (Ebud_01).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Penny Kurowski

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed East Budleigh site is within the new settlement boundary shown in this proposed plan, hence meeting SP03, SP05 and SP06, however it is outside the Built-up Area Boundary in the Neighbourhood Plan for East Budleigh with Bicton (Made and Approved 2017).

The proposed development needs to be only affordable housing but there are minimal employment opportunities, ie, a volunteer-run community shop, a volunteer-run pub, a church and a school so this is not a sustainable development contrary to SP01. The current infrastructure, ie, pedestrian, cycling and vehicular access, is inadequate in and around East Budleigh and this proposed development will exacerbate the problems as Frogmore Road is a very narrow road close to the Lower Otter Nature Reserve contrary to SP07. Access to the main village will require crossing the busy B3178.

East Budleigh and the River Otter estuary are within a National Landscape. The proposed site is adjacent to the Lower Otter Nature Reserve which is nationally important, is still developing and is designated a site of Special Scientific Interest (SSSI) - the site development will not enhance the NL and is contrary to OL02, PB01 and PB02 and will fail to meet PB05. The proposed development will impact the scenic quality of the district and the view to the iconic Syon House contrary to OL04.

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 SD16 from the Local Plan.

If this is not possible then it should be reduced in size.

Any development should consist only of affordable housing or small units suitable for first-time buyers.

A safe crossing a method, including paths for pedestrians, should be made from the site to the main village.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ian Devonshire Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EAST DEVON LOCAL PLAN SD 16: Allocation of new housing to East Budleigh li to Policies Map East Budleigh's quota of 22 houses should not be in Frogmore Road because of location, planning history and preferable alternative(s). Reasons

1. A 2014 outline application for 18 houses on a site fmcluding area Ebud 01 proposed for the 22 homes) was withdrawn, after objections, and replaced by a 2016 outline application for 5 houses on part of the site south-east of Ebud 01. Despite 47 public objections, detailed planning approval was obtained in 2021 on the basis of reduced scale and lack of impact on existing residents. A further application was made in 2022 for a single house, which has been built between the existing houses and the proposed 5,e of which has been built

2. Objections that continued to apply to the 5 (now 6) houses were, and remain- a. the danger of significantly increased traffic into a narrow =al road much used by pedestrians accessing the public footpath to the river and cyclists (mute 52), b. the proximity to Flood risk areas 2 and 3 c. the eastwards spread of the Village boundary into an AONB (National Landscape area) towards the Otter Valley (now also home to a nature reserve).

3. The effect of putting 28 houses on the area, where an application for 18 was withdrawn, greatly increases the above objections. In addition, the gardens and back of existing houses would be overlooked by houses on the slope up to Syon House. Crucially, the allocation of 22 houses to East Budleigh is tied to facilities in the Village (school, shop, pub etc). It is better that the residents of the 22 houses should have access to these facilities without having to cross the main mad. It also avoids all the extra traffic having to negotiate the difficult crossing by the Rolle Arms.

4. An alternative site, I believe called Collins Park as shown on the accompanying plan, can easily accommodate the area of Ebud 01, leaving free the footpath across the site

for access into the Village (which could be connected to the path across the road by a pedestrian crossing). Also access to the flat section of the main road can be direct, avoiding existing congestion at the Rolle Arms crossroads (and access onto the main road below the brow of the hill, if Ebud01 were to be connected there). Unlike Ebud 01, the site is level and construction access is better. Extending the 30mph limit north beyond Salem Chapel would give extra safety. Other ways (Rolle Arms?) of distributing the 22 houses mandated by the District may be identified and it seems right for the Village to decide where they are to be placed. The settlement boundary should be amended to reflect the choice.

5. Obviously the views of the landowner and tenant of Collins Park (who either way lose a field but EB_01 seems to have been more used, for young cattle) are key but we trust the interests of the Frogmore residents and the residents around Collins Park and elsewhere in the Village will also be given appropriate weight. Nimby allegations may be raised but they are a two-edged sword and the residents at the west end of Frogmore Road already face a 50% increase in adjacent housing.

6. Finally, further housing density within around 500 metres of the Otter Valley and its new nature reserve is problematic in itself. New developments within 10 kilometres are reported to have adverse effects on sensitive nature locations.

Full name: Ian Devonshire Smith

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: I do not wish to allege illegality without evidence but this is a question for lawyers, not lay residents. There should be a don't know button.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site, E_Bud01 is wrong because it was recently successfully opposed in planning, is outside the current settlement boundary, on farmland, near Flood Risk 2/3 areas, would cause dangerous traffic congestion and there is/are better alternative(s)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see attached note and accompanying plan showing an alternative site and changed settlement boundary

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Again there should be a don't know button but only learning of a site near our homes so apparently close to a decision does not seem to indicate cooperation

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: My neighbours in 19 houses in Frogmore Road support this application. That is all but 6 houses in the road - one derelict and empty, one new and empty, one where the neighbours are on a lengthy cruise (but would also support, I am fairly sure), one where the neighbour has submitted her own objection and two owned by Clinton Devon, whose views will have been heard. There is elaboration that the inspector may wish to examine.

SD17

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a coordinated approach, DCC requests that an additional paragraph be added to the text relating to this policy: “An agreed Masterplan that provides for a development scheme for both allocations at Exton would help maximise the opportunities and minimise the potential adverse impacts of development, including in relation to transport.”

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
Please see attached representations.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to address any queries regarding the deliverability of this policy.

Full name: Alex Munday

Organisation (where relevant): Kitchener Land and Planning

Other party name (if relevant): Mr Lillie and Ms Blundell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

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.:

Alexander Munday of Kitchener Land and Planning (KLP) on behalf of Mr Lillie and Mrs Blundell.

This Representation is made, on behalf of Mr Lillie and Mrs Blundell who are the landowners of the site , in response to the Regulation 19 Publication Draft of the East Devon Local Plan Review 2020-2042.

Overall, we fully support the inclusion of the site known as Land West of Oaklands (Wood_01), that has been included in the Draft Plan and is proposed for allocation of around 14 dwellings.

The site remains a very good candidate for allocation in the emerging Local Plan Review, and this is supported by the technical work and masterplan prepared to support the ongoing promotion.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

These representations have however highlighted a number of concerns and some objections to draft policies in the plan and have set out within these representations where we consider changes are required in order to ensure the soundness of the plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We trust our comments should be fully taken on board and changes to the Draft Plan made as a result.

Full name: Alex Munday

Organisation (where relevant): Kitchener Land and Planning

Other party name (if relevant): Mr Lillie and Ms Blundell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Alexander Munday of Kitchener Land and Planning (KLP) on behalf of Mr Lillie and Mrs Blundell - Landowners of Wood_01

We support Strategic Policy SD17 and specifically the proposed allocation of the Land West of Oaklands (WOOD-01).

The proposed allocation states:

Land west of Oaklands (Wood_01) The site is allocated for around 14 dwellings. Suitable provision must be made for pedestrians to safely cross from the site across the A376 to enable easy access to facilities in the settlement, along with pedestrian/cycle links to Wood_28 adjacent to the south east.

Exton is a sustainable location for future development. The village is very well connected to Exeter on the basis of both its proximity and public transport links. This includes the presence of a railway station in the village and regular bus services. The railway station in particular provides direct connections into Exeter with journey times of only 30 minutes. These public transport services provide residents with good connections to Exeter and the range of regional employment, retail and leisure facilities on offer as a result.

In addition, Exton hosts the following which provide day-to-day services and facilities:

- Shop / convenience store
- Pub
- Village hall
- Children's play area

As a result, Exton is an entirely appropriate location for future growth, and we support the Council's commitment to direct a proportion of the required growth to the village.

We specifically support the proposed allocation Land West of Oaklands (WOOD-01) for the development of around 14 residential dwellings. We also support the policy wording that provision must be made for pedestrians to safely cross the A376 to enable easy access to facilities, along with a pedestrian link to WOOD_28 adjoining WOOD_01 to the south east.

The development of the site can provide much needed housing to help meet local housing needs, as well as helping to sustain the vitality and viability of the existing services and facilities in the village.

We agree that the development of the site should explore appropriate pedestrian and cycle access and that this may require some highway improvements. Such improvements can be reviewed further as part of an emerging masterplan for the site.

Full name: Alex Munday

Organisation (where relevant): Kitchener Land and Planning

Other party name (if relevant): Mr Lillie and Ms Blundell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

Full name: Dan Yeates

Organisation (where relevant): Savills

Other party name (if relevant): 3West Group

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

We support Strategic Policy SD17 and specifically the proposed allocation of the Land north and east of Exton Farm (Wood_28).

The proposed allocation states:

Land north and east of Exton Farm (Wood_28)

The site is allocated for around 39 dwellings. Development will need to provide safe and suitable pedestrian and cycle access along Mill Lane south to the existing pedestrian crossing at the A376/Station Road junction, to enable easy access to facilities in the settlement. This pedestrian crossing should be upgraded to accommodate cyclists, to enable access to the Exe Estuary Trail via Station Road. Development should provide pedestrian/cycle links to Wood_01 adjacent to north west. Development should include tree planting on the southern field to reflect their historic presence; and retain the hedgerow that dissects the site, as far as practically possible. Development should address the existing flooding issues along Mill Lane.

Firstly, Exton is a sustainable location for future development. The village is very well connected to Exeter on the basis of both its proximity and public transport links. This includes the presence of a railway station in the village and regular bus services. The railway station in particular provides direct connections into Exeter with journey times of only 30 minutes. These public transport services provide residents with good connections to Exeter and the range of regional employment, retail and leisure facilities on offer as a result.

In addition, Exton hosts the following which provide day-to-day services and facilities:

- Shop / convenience store

- Pub

- Village hall

- Children's play area

As a result, Exton is an entirely appropriate location for future growth, and we support the Council's commitment to direct a proportion of the required growth to the village.

We specifically support the proposed allocation of Land north and east of Exton Farm (Wood_28) for the development of 39 residential dwellings.

The development of the site can provide much needed market and affordable housing to help meet local housing needs, as well as helping to sustain the vitality and viability of the existing services and facilities in the village.

We agree that the development of the site should explore appropriate pedestrian and cycle access and that this may require some highway improvements. We also agree that development should address the existing flooding issues along Mill Lane. Such work relating to highways and flood risk will be reviewed further as part of an emerging masterplan for the site.

The site is also capable of accommodating the necessary tree planting as requested by draft Policy Wood_28), and would in any case look to retain trees / hedgerows as far as possible to maximise biodiversity net gains.

Overall, the land north and east of Exton Farm remains a strong candidate for allocation in the emerging Local Plan Review. The site is available and very much capable of accommodating the 39 new homes proposed in draft Policy Wood_28, including a policy compliant level of affordable housing.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is important that 3West Group is present to participate in the hearing session for Policy SD17 owing to their interest in the Land north and east of Exton Farm (Wood_28). It is important that they are given the opportunity to make their case in relation to this policy.

Full name: Paul McLoughlin

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Don't really understand the question but my comments below, on the proposed development may indicate an answer.

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.: Re Land adjoining Mill Lane Exton. (Wood 01 & Wood 028). This land is a flood plane for higher land containing housing & farms. Mill Lane often floods at its lower levels. Mill Lane is a single track road with only one passing place (which is not maintained & is often used for parking of vans delivering or belonging to contractors). There is no pedestrian foot path. I live in a property off Mill Lane & I often have to reverse into peoples drives to allow other vehicles to pass.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Over Development for reasons given above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Greatly reduce the number of proposed properties . Mill lane would need to be widened to two lanes or additional passing places added, plus a foot path for pedestrian safety. No idea what can be done about flooding as this sometimes also comes from an overflowing stream.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sue McLoughlin

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Firstly I live at Oaklands. The land to the west I have no problem with as long as a footpath is included which will make crossing the road easier. The A376 is becoming a very dangerous road to cross . I have seen a big increase in traffic in the 14 years I have lived here. With all the new houses being built along Dinah Way in Exmouth the A376 will probably have to cope with more traffic. Can I please ask that the buildings are not too close to the boundary to respect our privacy.

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.: Not specifically opposed to this development but I am very concerned about the flooding aspect. I recently had a problem after a very heavy downpour. Mill Lane is very narrow with sharp bends & no passing places or pavement. We also enjoy a variety of local wildlife which should be considered with any new development

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.: Since the cycle path has been extended to Woodbury along Mill Lane there is a problem with cyclists exiting the path

from Woodbury at high speed without checking Mill Lane. Maybe a stop sign & lines would help this situation.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Please refer to answers given previously

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Please refer to previous answers.

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.: It would be good if the train could stop at Exton Station every 30 minutes without it being requested.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exton is an area where the housing is quite expensive & therefore I suspect none of this development will be suitable for social housing. The council will still need to fulfil this need to comply with the duty to co-operate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land north and east of Exton Farm (Wood_28) - This policy contains the wording: 'Development should address the existing flooding issues along Mill Lane.' The word 'address' offers no clarity on what is expected from developers. Preferable wording would be: "Development proposals should first avoid the area of flood risk. Where this is not possible with full justification, development must mitigate the flood risks". However, we recognise that this doesn't seem to go beyond the requirements of the NPPF and therefore does not add much value. Either specific requirements should be set out, or this sentence is not needed.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Wood_28: The proposed site allocation is located immediately to the east of the farmstead associated with grade II* listed Exton Farmhouse and forms the remaining rural/agricultural setting to this heritage asset (nb. It appears likely that remaining vernacular farm buildings may be considered curtilage listed). Development of the whole site would sever much of the remaining link and would therefore harm the significance that Exton Farmhouse derives from its setting. We note that rising land to the northeast of the farmstead also enjoys views over the Exe Estuary and towards The Belvedere tower (grade II*) at Powderham. As a minimum we would expect development to seek to conserve and enhance the setting of the designated heritage asset through careful consideration of layout, design, building height and landscaping. It may be possible to mitigate impacts by restricting development to the southern part of the site and retaining the northern section as green open space with visual links to the historic farmstead.

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.: Wood_28: We request a more detailed HIA including assessment of the potential for development to impact on the remaining rural setting of grade II* Exton Farmhouse, including views into and out of the historic farmstead from rising land to the northeast, and proposed mitigation measures. This should inform a concept plan to evidence whether the proposed site capacity can be achieved without unacceptable harm to this highly

graded heritage asset. The site boundary, capacity and/or policy wording should then be adjusted to reflect this evidence.

Full name: Christopher Waldron

Organisation (where relevant): Ministry of Defence

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic Policy SD17: Development allocations at Exton Land north and east of Exton Farm (Wood_28) with the site allocated for around 39 dwellings. The housing development boundary has a section that falls within the explosive Vulnerable Building Distance (VBD) statutory safeguarding zone with the outer extent defined by a purple line on the statutory safeguarding plan. Within this zone all inhabited buildings need to be deemed as being ‘non vulnerable’ structures. This means they should be of robust design and construction so that should an explosion occur at the MOD explosives storage facilities, buildings nearby will not sustain damage that could cause critical injury to the occupants. Developments and land use that directly support large gatherings of people outside can also be of relevance to the management of explosives safeguarding requirements for this zone. The MOD would wish to review and should be consulted on any development within the statutory safeguarding zones surrounding CTCRM Lympstone. MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

SD18

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To clarify requirements, DCC requests that an additional paragraph be added to the text relating to the Feni_05 and Feni_08 allocations: “The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.”

Full name: Alan Williams

Organisation (where relevant): Grass Roots Planning

Other party name (if relevant): South West Strategic Developments Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We write on behalf of South West Strategic Developments Limited (SWSD) in relation to the East Devon Local Plan Regulation 19 consultation, specifically regarding Land adjacent to Beechwood, Feniton, which is identified as an allocation (ref. Feni_08). SWSD has an agreement with the landowners of this site to promote it for residential development. Previous representations have been made regarding this development site including to the East Devon Call for Sites and Local Plan Issues and Options Consultation in 2021, and the site has been considered by the Council as part of the Housing and Economic Land Availability Assessment (HELAA). It is important to stress from the outset that we support and welcome the site's (ref. Feni_08) inclusion in the emerging spatial strategy as an allocation to meet the identified housing need in East Devon. Notwithstanding, we have been instructed by SWSD to prepare and submit these representations to the East Devon Local Plan Regulation 19 consultation. Our submission provides comments on the local plan spatial strategy and key specific policies (including Strategic Policy SD18, which relates specifically to this site), as well as setting out that the site is available and deliverable, and confirming that the site should continue to be allocated for residential development. This representation is consistent with the previous submissions made to the Council, and should be considered alongside these, as it does not seek to repeat the points previously made in detail. It should also be noted that SWSD has appointed a technical team who is in the process of preparing detailed evidence to underpin an Illustrative Site Plan for the development proposals, which includes transport, drainage, ecology, landscape, trees, heritage, ground conditions and urban design matters. An Illustrative Site Plan has been prepared, which outlines that up to 60 dwellings could be delivered within the allocated land parcel alongside significant levels of public open space (including areas for ecological enhancement), children's play area, an

attenuation feature, and trees and hedgerow planting. This Illustrative Site Plan is enclosed with this letter at Appendix 1.

A request for pre-application advice is currently with the Council and it is anticipated that an outline planning application, with all matters reserved except for access, will be submitted by May 2025. Accordingly, once the Local Plan Examination begins, a planning application will be before the Council, which will demonstrate the site's deliverability to the Planning Inspectorate to underpin the allocation of this land.

Full name: Alan Williams

Organisation (where relevant): Grass Roots Planning

Other party name (if relevant): South West Strategic Developments Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Strategic Policy SD18 sets out the development allocations at Feniton. This states the following: “The sites/areas listed below, as identified on the Policies Map, are allocated for development at Feniton. Land adjacent to Beechwood (Feni_08) Land adjacent to Beechwoods is allocated for around 60 dwellings. Careful designed and implemented boundary treatment on the eastern side of the site will be required to form a soft edge to the countryside beyond.”

We support this policy approach, as well as the specific criteria and requirements set out within the policy. The proposed Illustrative Site Plan for the site has carefully considered the constraints and opportunities for the site. It demonstrates how a scheme of 60 residential dwellings (including open market and affordable housing) can be delivered alongside carefully designed and substantial boundary treatment on the eastern side of the site to form a soft edge with the countryside beyond. In addition, public open space and children’s play area (including areas for ecological enhancement) will in effect deliver areas of publicly accessible space for existing and future residents to enjoy, an attenuation feature, trees and hedgerow planting, and other infrastructure. This has been informed by technical work including highways, ecology, landscape, heritage and drainage, all of which underpin the Illustrative Site Plan design. We, therefore, consider this to be an optimal solution for the delivery of housing at Feniton that would see a multitude of benefits being realised without harm being caused.

Full name: Marcel Venn

Organisation (where relevant): Marcel Venn Associates Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

1. Introduction

1.1 The following report is submitted to support the allocation of the land at Westlades Feniton, for future residential development.

1.2 Westlades is 1.79 Ha (4.4 acres) of land on the north east edge of Feniton, in a location that does not suffer with surface water flooding. There is scope to redevelop the entire site, but the most suitable and proposed redline would be to allocate a smaller option of the rear garden infilling between the main house and the village boundary. This would be 0.52 Ha (1.3 acres) and thus qualify as a small site option.

1.3 Under the NPPF EDDC need to allocate at least 10% of their new housing as small site options, to give choice to SME developers (these sites need to be under 1 Ha (2.47 acres)). There seems to be a shortage of small sites being allocated in the current Local Plan Reg 19 being taken forward and this would be an excellent choice to include.

1.4 The whole site was assessed as suitable at the Reg 18 stage of the plan, so my clients took no further action to promote their land. EDDC assessment stated the land had no over-arching constraints. Like most sites some offsite footpaths and cycle links would be required, but that is the norm for most new sites. Mention was made about the mature trees on site and them supporting nature (like most trees do). None of these trees would be removed or altered to allocate this site. Access can come off the current driveway into the site or a new access cut through the bank.

1.5 Analysis by EDDC indicated that the land was worthy of serious consideration at the Reg 18 stage. It would appear there are no real constraints to allocation.

1.6 The site was determined to be in a suitable location for further development in the village and it was accepted that the site could be allocated for residential development, flagging that there were some mature trees on the boundary (that would not be touched if the site is developed).

1.7 These Reps are made to help explain to EDDC why this is a good and suitable location to be allocated and why the site needs to be re-included as a small site option for new homes in the village.

1.8 The considerations raised by EDDC have been looked at in detail by me and a team of consultants and none of the issues raised would in any way prohibit development of this site.

1.9 This report thus highlights the opportunity this field provides and if allocated, could be built out within the next 5 years, providing new family homes in Feniton.

1.10 EDDC need to allocate at least 10% of the new housing allocations as small site options, this site of 0.52 hectares is an excellent choice.

2. Site and Surrounding Area

2.1 The site is a residential property in large grounds known as DN438097 on the land registry. The site is on the north eastern side of the village, close to facilities.

2.2 The combined area of the whole site is 1.79 hectares gross in size, currently set to pasture and garden, around the two residential homes on site. The property is surrounded by hedges and trees on most of its boundaries.

2.3 It is being suggested that 0.52 hectares of the fields are allocated for development in the western portion for development (see attached plan)

2.4 The fields slope very gently, which would not restrict or prevent development in any way. The gentle nature of the slopes will help with natural drainage.

2.5 The site is accessed from one main point, off Station road at present. This access point could be widened to allow for further development. Or if desired a new access point could be cut through the bank, avoiding the large trees, visibility splays have been checked and this would appear to work if considered more appropriate.

2.6 The site does have a range of large trees mainly on the boundary. None of these would be touched at all if the site was developed. There are no mature trees within the site that would be impacted upon for the 0.52 hectare part of the site suggested for allocation. Thus again, none of the mature trees whatsoever will be touched in any way to facilitate development, for land being proposed to be allocated.

2.7 To the west of the site the surrounding area is residential with a range of amenities including a pub, local shop and primary school. There is also play space for children and a local youth club close by, also a train station making the site sustainable.

2.8 The surrounding area to the north is open space, to the east is a church, hair dressers and bowling club, making this is sensible location to allocate for new homes.

3. Suitability Assessment

3.1 Flooding - The site lies in Flood Zone 1. The whole of Feniton is a critical drainage area, but this site is not prone to flooding and a new scheme to alleviate the issue is being constructed. The Feniton Flood Alleviation scheme is due to be completed in 2025.

3.2 Biodiversity – The site is not within a SAC or SPA or SSSI.

3.3 Access – The site has 1 point of access, at this stage, this can be widened for the new residential development. Or a new proposed access point can be facilitated, visibility splays have been checked. The site is only 250m from the primary school.

3.4 Air Quality – The site is not near to an AQMA but we should encourage cycling, walking and bus use where possible. The site is well served by buses, with a bus stop close by, making it extremely sustainable in transport terms. The train station is only 500m away again making this a suitable location.

3.5 European sites – No immediate risks.

3.6 SSSI – None within or adjacent to the site.

3.7 Ancient Woodland – None within or adjacent to the site.

3.8 Priority habitats – Hedges surround the site and some mature trees, but none will be impacted if the site is allocated for housing.

3.9 Other habitats/features – None.

3.10 Protected Species – Bats likely to be present due to hedges and trees.

3.11 Heritage & Archaeology – No listed buildings nearby.

3.12 Landscape – No issues.

3.13 Minerals – No issues.

3.14 There are mature trees on the boundary and some within the site, but none would be impacted upon if the site is allocated for development.

3.15 Climate change – The site is located close to bus stops and a train station. Also, the village itself has a good range of amenities making it a sustainable location for a

small allocation. This development will help ensure the village and the school stay viable in the future.

3.16 The site is serviced to the boundary meaning that there are service utilities in the road outside including, electricity, water, telecoms, connecting to sewers and gas are close-by. This is a key point as this helps make the land viable to be allocated and come forward as a project.

4. Planning History and other Consultants Overview

4.1 The site has had 2 live applications the last 25 years.

4.2 There was an application for conversion of outbuildings to residential use, this was approved on 20th September 2001. <https://planning.eastdevon.gov.uk/online-applications/caseDetails.do?caseType=Application&keyVal=ZZZZAVGHXT00>

4.3 There was an application for a new replacement conservatory was approved on 14th May 2021. <https://planning.eastdevon.gov.uk/online-applications/caseDetails.do?caseType=Application&keyVal=QRIF6MGHLRY00>

4.4 A landscape architect has appraised the site and it is fine for development.

4.5 A drainage engineer has assessed the geology and a sustainable urban drainage design would be acceptable for this site.

4.6 An ecologist has assessed the site, which has confirmed no issues.

4.7 An arboriculturist has reviewed the site and confirmed the site can be developed with no harm to the mature trees on the site.

4.8 A highways consultant has reviewed the site and checked access for suitability and if a new access was to be cut, that the visibility works.

4.9 A utility engineer has reviewed the site. Various searches of the utility infrastructure have been done and all exist in or close to the site, making it a serviced site, helping ensure viability and suitability for allocation.

5. Conclusion

5.1 There is a large demand for new housing in the local area, due to its proximity to good transport links and the village's good selection of amenities; and this site is ideally suited for allocation and future development.

5.2 This is a suitably sized site for Feniton and is by far the best option for a small site for the village. It will not be overbearing for the village, whilst not being too small as to not make any difference. It would appear it is the right size for the village with a proposed 0.52 hectares for allocation.

5.3 It is clear the current Reg 19 does not allow for enough housing, nor does it allow for enough housing in Feniton, nor does it allow for enough small sites, which it has to under the NPPF, on all counts this site should be allocated.

5.4 This site is readily suitable, available, and achievable within the shortest time frame of within the next 5 years.

5.5 There is no doubt this is by far the best option for housing in the village on all grounds, including planning merit. It is disappointing it has been overlooked from the Reg 18 stage to the next Reg 19 stage and these Reps should help to explain why this site needs to be re-included.

Full name: Jeremy Gardiner

Organisation (where relevant): Pegasus Group

Other party name (if relevant): Taylor Wimpey Strategic Land

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Two sites are proposed to be allocated for housing – Land at Burlands Mead (Feni_05) for around 42 dwellings, and Land adjacent to Beechwood (Feni_08) for around 60 dwellings. These two allocations together total 102 dwellings against a minimum (80%) requirement for 127 dwellings. Planning permission was resolved to be granted on 25th February, 2025 for the Burlands Mead site (application ref. 23/0296/MFUL) for 35 dwellings, so under-delivering by 7 dwellings against the above draft allocation. Assuming that Feni_08 delivers 60 dwellings (which is to be confirmed), these two draft allocations will deliver 95 dwellings, being a shortfall of 32 dwellings against the minimum requirement in Policy SD18 and a shortfall of 64 dwellings against the minimum Standard Method requirement of 159 dwellings. The southern part of promoted Site Feni_11, east of Colestocks Road, Sherwood Cross, Feniton being promoted by Taylor Wimpey should be allocated for up to 86 dwellings to ensure that the minimum local housing requirement for this Service Village is exceeded in a planned way, thereby delivering the sustainable development of the settlement in the plan period. This is a sustainable site which can deliver a number of additional benefits including affordable housing and flood alleviation.

Full name: Ben Luxton

Organisation (where relevant): Stags

Other party name (if relevant): Mr Wilfred and Mrs Elizabeth Tratt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Please refer to the supporting correspondence.

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.: Please refer to the supporting correspondence.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Please refer to the supporting correspondence.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the supporting correspondence.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Please refer to the supporting correspondence.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Frances Lennon

Organisation (where relevant): Turley

Other party name (if relevant): Bloor Homes Exeter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

1. Introduction and Site Summary

1.1 This response has been prepared by Turley on behalf of Bloor Homes Exeter [‘Bloor Homes’], to provide representations to East Devon District Council [‘the Council’], in relation to the East Devon Local Plan [‘EDLP’] Regulation 19 consultation March 2025.

1.2 Bloor Homes have an interest in land off Ottery Road, Feniton. A site-specific location plan is provided at Appendix 1 of this representation, which confirms the extent of Bloor Home’s land interest. A summary of the site is provided below.

1.3 The site within the control of Bloor Homes to promote and develop. Bloor Homes are an experienced national house builder with a proven track record of high-quality design, with the delivery of homes across a range of site scales.

1.4 We previously responded on behalf of Bloor Homes the Call for Sites consultation undertaken between April and May 2022 and the Regulation 18 Consultation in January 2023.

1.5 On behalf of Bloor Homes, Turley submitted an outline planning application for 85 homes, a community eco-hut and associated infrastructure to the Council in March 2025 (ref. 25/0509/MOUT). The application is live and currently under consideration. The proposed masterplan is provided at Appendix 2 of these representations. Land off Ottery Road, Feniton

1.6 The site is located to the west of Ottery Road and extends to approximately 5.43 hectares. It lies to the south west of Feniton. The extent of the site is shown below.

Figure 1.1: Land off Ottery Road Site Location 4 Site Promotion History

1.7 The site has been assessed during the preparation of the Local Plan with reference numbers FENI_04 and FENI_14. Our previous representations to the Regulation 18

consultation provided responses to the key conclusions from the Council's Sustainability Appraisal [SA] and HELAA Site Assessment. In summary:

- The Council's previous HELAA Site Assessment (that was published with the Regulation 18 consultation) concluded the site is available and suitable, but the panel concluded that the site is probably unachievable for housing due to minerals constraints, subject to MRA. A Mineral Resource Assessment (submitted in support of the representations) demonstrated that the site could come forward and the mineral safeguarding objections can be addressed.
- The SA concluded that Feni_04, is of some landscape prominence. However, the HELAA Site Assessment report concludes that residential development at the Site would not have an unacceptable impact with regards to landscape. Initial technical feasibility work was submitted with the representations to demonstrate that the site has the potential to have a sensitive design with regards to heritage and landscape.

Accessibility and Site Constraints

1.8 The site is in a sustainable location. To the north and east of the site lies residential development and the site will form a natural extension to the existing town.

1.9 The site is very well located with respect to Feniton railway station, which lies immediately to the North and at a distance of only circa 100m at its nearest point. The existing Feniton railway station provides frequent connections to London Waterloo and Exeter St Davids. This provides excellent opportunities for making journeys by public transport to other higher order settlements for work, education nor other purposes.

1.10 The village of Feniton is also served by existing bus services which provide public transport connections to other nearby towns and villages, including Whimple, Sidmouth and Honiton, giving access to various other services and facilities. The nearest bus stop is just 100m north of the Site, located to the south of the railway station.

1.11 Existing facilities and services within Feniton are located to the East of the site, and accessible on foot via a railway bridge at Station Road.

1.12 The Council's HELAA Site Assessment (that supported the Regulation 18 consultation) confirmed the site is within 1,600 metres of 4 or more different local facilities and within 1,600 metres of a train station or bus route with an hourly or better service.

1.13 With regards to flood risk, the site is located in flood zone 1. It is therefore at the lowest risk of flooding – in this respect, it meets the Council's spatial strategy of avoiding development in areas of flood risk. As such, the Proposal Site can provide a significant contribution to housing delivery while avoiding risks associate with flooding.

1.14 The site is not located with an AONB (where the East Devon AONB otherwise covers large parts of the District), or any other designated landscape. 5 Deliverability

1.15 The draft Local Plan needs to allocate enough housing sites that can be brought forward at a sufficient rate.

1.16 The site is available now and within the control of Bloor Homes to promote and develop. As set out above, Bloor Homes are an experienced developer with a proven track record of high-quality design, and delivery of a range of site scales. As such, importantly there are no land ownership impediments to developing the site and this is a site that is capable of being brought forward for development quickly.

1.17 Detailed technical work that accompanies the live outline planning application (particularly in regards to minerals, highways/access, drainage, and landscape/heritage) demonstrates the mineral safeguarding objections can be addressed, a sensitive design with regards to landscape and heritage and a safe access can be achieved. Unique Benefits

1.18 The allocation of the site will also provide unique benefits:

- Delivery of new market and affordable housing - This development provides the opportunity to meet identified local housing needs, with proposals including up to 85 homes with affordable housing in line with policy, and properly taking account of site constraints.
- Delivering local flood mitigation - The scheme will safeguarded land for part of the Council's Flood Alleviation Scheme, diverting flood water from Feniton to the stream to the south of the village.
- High quality landscaping and POS creation: the landscape-led layout will be designed to include new areas of publicly accessible open spaces.
- Designed to achieve a biodiversity net gain - The scheme has the potential to provide rich planting to enhance ecology, create new habitats and deliver a biodiversity net-gain for the site.
- Community Eco-Hut – the proposal has responded to previous public consultation and includes a community eco-hut. Site Summary

1.19 Bloor Homes have an interest in land off Ottery Road, Feniton. A live outline planning application for 85 homes at the site is currently being considered by the Council. We consider the site should be identified for housing development when:

- The site is available and capable of early delivery and is of a scale that can come forward quickly, being promoted by Bloor Homes, a house builder with an enviable track record of delivery;
- Detailed technical work that accompanies the outline application shows that the site can come forward where key considerations (such as mineral safeguarding, heritage and landscape) can be addressed; 6

- Land off Ottery Road provides site-specific location benefits which can aid and promote sustainability, including the delivery of new market and affordable housing, delivering local flood mitigation and publicly accessible open spaces. Strategic Policy SD18: Development allocations at Feniton

2.13 There is clear potential for more development to be accommodated at Feniton to meet local needs and support village vitality, where the plan for East Devon could and should be doing more to deliver elevated levels of new housing, including much needed affordable housing.

2.14 The delivery of just 109 homes over the 15 years of the plan period at Feniton (as housing trajectory at Appendix 2 of HOU-001) will unlikely be sufficient to meet local needs across the same period and is not a proportionate response to the role and function of Feniton as a local centre within East Devon.

2.15 The Council has within the plan acknowledged that further land (located within designated landscapes, including the National Landscape) will need to be released for residential development. Feniton is not located with an Area of Outstanding Natural Beauty (where the East Devon AONB otherwise covers large parts of the District), or any other designated landscape. It therefore represents an opportunity for the Council to deliver sustainable development on unconstrained land.

2.16 The evidence that supports the plan has shown that development on greenfield sites at and around the town of Feniton is necessary and justified in order to meet needs arising in the District during the plan period.

2.17 At Feniton the draft plan has chosen to allocate two sites for new housing at the town (representing a total of 102 homes, at a capacity of 42 and 60 homes respectively). A range of other sites have been discounted as being unsuitable, or less preferable, than those that have been selected.

2.18 The excluded sites include land being promoted by Bloor Homes to the west of the settlement (off Ottery Road), comprising FENI_04 and FENI_14. The Sustainability Appraisal [CSD-003] that forms part of the evidence base states the site is rejected due to adverse effect on the listed building to the south and adverse landscape impact; there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy; and loss of best and most versatile agricultural land (Grade 2).

2.19 As set above, a live outline planning application for 85 homes at the site is currently being considered by the Council. Considering the concerns raised in the Council's Sustainability Appraisal above, it worth noting that the detailed technical work accompanies the planning application demonstrates:

- **Heritage:** An Archaeological and Heritage Assessment prepared by EDP accompanies the application. It assesses the impact on the Listed Building. The only designated asset that would receive any adverse effects by the proposed development of the site is the Grade II listed building Sweethams. The site forms an element of the agricultural setting of the 17th Century cottage and, as such, makes some limited contribution to its significance by allowing it to be best appreciated within its original rural context. However, it is considered that only the southern portion of the site is considered to be sensitive in this regard. 11 The Illustrative Layout accompanying the application illustrates how mitigation has been incorporated into the design to successfully reduce the potential adverse impact of the Proposed Development on the setting of Sweethams through the retention of the southern portion of site as open space, as well as implementation of tree planting and garden landscaping at the southern edge of the built development. This landscaping not only filters any views of the development from the asset, but also maintains a rural landscape immediately north of the asset. As such, when mitigated, there is predicted to be no harm to the significance of Sweethams.

- **Landscape:** A Landscape and Visual Appraisal [LVA] prepared by EDP accompanies the application. The report concludes that, whilst the proposals would result in adverse effects on the site-wide landscape character and close-range views from the site's surroundings, this is inevitable when developing a green field site, but it would read as part of Feniton and would not be incongruous with the existing local context of residential built form. The proposed development is considered to accord with local planning policy and would sensitively and appropriately integrate existing landscape features into the proposed layout. The proposed landscape strategy would enhance existing vegetation and would provide a new, well-vegetated settlement edge that softens the transition towards the countryside in the west and filters views of the settlement. Indeed, given the allocation of many sites in sensitive landscape areas, including AONBs in the plan, the development of this site is sequentially preferable from a landscape sensitivity and impact perspective.

- **Agricultural Land:** A desktop review of the site shows it as Grade 2 Agricultural Land. It is noted that proposed allocation FENI_08 (Land adjacent to Beechwood) is Grade 1 Agricultural Land. The proposed allocation of FENI_05 (Land at Burlands Mead) is also Grade 2 Agricultural Land. Given the proposed allocations have either the same or improved agricultural land classifications than the proposal site, it is unclear why this has been raised as a reason to reject the site from allocation.

2.20 In summary, it is not clear why Land off Ottery Road (FENI_14) has not been considered suitable for residential development when:

- Feniton is clearly a sustainable location for growth, with the rail station a significant asset in respect of sustainable travel. The village of Fenton should be classified as a Local Centre, as opposed to a Service Village.

- Detailed technical work that accompanies the outline application shows that the site can come forward where key considerations (such as heritage and landscape) can be addressed.
- The site is available and capable of early delivery and is of a scale that can come forward quickly, being promoted by Bloor Homes, a house builder with an enviable track record of delivery; 12
- Land off Ottery Road provides site-specific location benefits which can aid and promote sustainability, including the delivery of new market and affordable housing, delivering local flood mitigation and publicly accessible open spaces.

Full name: Stephanie Arris-Barker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Feniton can just about cope as it is, but to have more houses, more people, more things on the road, would mean much more damage to roads etc. School can't cope nor the doctors. You'd be putting our lives in peril in more ways than one. Wake up people. Surely you aren't that blind or evil. No more pushing at the moment we a healthy village. Any more cars, lorries, busses would harm our fresh air. We want to live, not be killed off by bullies like you lot. Stop now.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No more building or transport coming to our village. We're big enough and over spilling as it is.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Helen Beaven

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: As I am not a planning lawyer, I cannot comment on legal specifics. However, there appear to have been irregularities in the development of the local plan so far as Feniton is concerned.

I am aware that in previous consultations, there were many representations submitted, including a petition signed by large numbers of residents, which were not taken into consideration because they were not submitted via Common Place. As a result, the views of Feniton residents were ignored as they were not passed on to the Strategic Planning Committee.

As comments were invited, it seems very undemocratic that they should then be disregarded. The use of the Common Place system is not helpful as it is difficult to use, as well as being time-consuming, which is a further deterrent to public engagement in a system which is inviting them.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: N/A

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Because a large number of houses has been allocated to Feniton – way more than the 13 houses which were identified as being needed in the village. When this discrepancy was identified, the Chairman of the Strategic Planning Committee instructed that the policies be re-written to justify such a large increase in development in Feniton. The policies do not now match what is needed or what is appropriate. The proposed development is huge for a village of this size.

The Otry_20 site has come to the table relatively late in the process and there is therefore a concern that EDDC has not had time to consider the impacts of this development as thoroughly as necessary. This site would have a huge impact on the Feniton village, but proper consultation with the Feniton Parish Council has not been possible because the site technically lies within Ottery Parish – for whom it would really have no impact at all. The size of the Otry_20 site is absolutely disproportionate for a village the size of Feniton, but the biggest issue is the roads which the inevitable heavy traffic would have to use. There are two single track railway bridges, one with a blind bend, to navigate, also a section of sunken road which is prone to landslips and all of the access roads have largely single track and already dangerous for pedestrians with passing cars, never mind heavy lorries. Therefore the road access is wholly unsuitable for such a site.

Also, because there were some very significant reasons why the super enquiry in 2014 rejected the various planning proposals on the table then and these reasons have not gone away – if anything there are more:

- There is a station in Feniton, but the vast majority of people still need to use cars to access work and other facilities and the road infrastructure will not accommodate significant amounts of extra traffic. With the main road in and out of the village closed for 3 weeks recently, the queues of traffic attempting to make their way in and out via the old village led to frequent traffic jams. Increased volumes of traffic will only make this more common.

- There is no room in the school.
- The local doctors (and dentists for that matter) have no further capacity.
- Feniton floods on a regular basis. Although the flood alleviation scheme is coming towards fruition, this will not stop the flooding – it will just direct the volume of water away from housing. The area where it will gather is the main road in and out of the village, which often becomes impassable and this will only become a more frequent occurrence (leading to travel issues again). A lot of the water flooding Feniton is run-off from local fields. If the fields are covered over with housing, the run-off will be even more. Other developers have sought to suggest that they will tackle this issue as part of their development, but have not then done so. Unfortunately, there appears to be no enforcement to ensure that developers actually deliver the conditions of their planning approval. Even where some measures have been installed, they have been incorrectly/poorly installed and do nothing to help the situation.
- The sewage network does not operate correctly and cannot cope with the outflow storm water. SWW often visit the village with tankers. They frequently discharge raw sewage into a gulley behind some of the houses leading out of the village (this is obvious because of the items seen floating down there). It is well documented that raw sewage flows into roads and homes. Residents in some of the developments, at times of high levels, have to stop flushing their toilets and ask their neighbours not to do so either for fear that it will back up and overflow out of their toilets. SWW responses have been woefully inadequate. Therefore, additional housing needing to discharge their waste into this network is completely untenable.
- This Local Plan has disregarded the evidence and planning history which clearly shows that development in Feniton is not sustainable. The plan does not allow for any further development of the current infrastructure, so the problems outlined above will only be exacerbated.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure that the

Local Plan is sustainable and better reflects the Tier 4 status of Feniton and until the issues outlined in 4 (b) have been addressed:

- Removal of Feni_08 from the Local Plan, or to at least reduce the number of houses included.
- Removal of Otry_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: (This would be more appropriate for the Feniton Parish Council.)

Full name: Fiona Broadbent

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.

- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.

- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.

- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.

- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.

- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.

- Proposed development in Feniton is not ‘limited’ but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Access to Feni_08 would I understand be via Silverton Rise / Vineton Place, this is currently a “shared space”, the road surface is “sets” and there are no pavements, vehicular access would need to negotiate the parked cars on Silverton Rise to exit on to Broad Road. This would incur restricted vision as there are vehicles parked near the entrance to Broad Road.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: If the whole draft local plan is rejected, the whole of East Devon, including Feniton could be imposed with far greater development than has been suggested. Therefore suggestions for this section are:

To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Burkey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: It is unclear as to whether the draft local plan has been developed in a legally compliant way regarding Feniton. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, there was a petition signed by 500+ residents which was not taken into consideration as it was not submitted via Common Place. These important views were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians. Not everyone is able to or understands the internet and the Commonplace systems is complex to use. This is discriminatory.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Flooding:

- It's well documented that Feniton regularly floods. It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.

- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton and there is no evidence that it will work effectively. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30. With an increase in building this will only get worse. Developers promise their own flood alleviation schemes, but this village knows only too well how empty these are. The development at Acland Park to name one example.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

- It is well known that there is not enough capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.
- It is unacceptable that people have raw sewage coming up into their bathrooms and onto their gardens.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development. Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- In fact, a lot of areas mentioned have got worse. The fact that Feniton has a train station seems to be sighted a lot. However, the service has got worse since the Super Enquiry with the service being reduced to 2 hourly. This is not a service you can rely on to commute. Everyone will use their cars!
- All of the roads into Feniton are narrow with pinch points unsuitable for heavy traffic. This was highlighted during recent road closures during the FAS works, it was virtually impossible to get out of the village at times if a bus and tractor happened to meet.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity as it Kings School in Ottery
- Local GP services are at capacity.

- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.

- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village. 102 dwellings is a far greater number than the 13 mentioned above. Feniton will no longer be a village but a town with no facilities or infrastructure leading to a very poor quality of life for all of its residents

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single-track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two areas of single-track road passing over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube -

<https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.

- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.

- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.

- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principal Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References:

Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jill Butler

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of over 100 houses and 4.6 acres of land for industry, distribution and research is not based on any evidence of the need for these in this location. The Vision of the plan states in paragraph 2.6 that “ Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development to meet the needs of local communities”. Spatial Strategy in SP01 says that “new development will be directed toward the most sustainable locations....allowing limited development at the service villages” (which includes Feniton).

Policy SP01 was deliberately changed (retrospectively) between the Regulation 18 consultation draft and the Regulation 19 plan following a further meeting (and subsequent debate) of the Council’s Strategic Planning Committee in November 2024 when it was realised that, in allocating 102 houses at Feniton, the plan was not following its own stated spatial strategy of “modest development to meet local needs”. The original Regulation 18 draft policy for the Service Villages mirrored the plan Vision and was only changed retrospectively when it was pointed out to the Committee that it had no evidence of the local needs in Feniton, and it was debated whether the plan might be found to be unsound by the Inspector because of this inconsistency. So instead of either finding the “evidence” of local need, or alternatively reducing the proposed housing allocation the Committee simply amended the wording of its previously agreed spatial strategy. This represents a blatant contrivance and deliberate action to make the previously agreed strategy now “fit” the subsequent allocation and seems like malpractice. This is all recorded and available on YouTube. The Parish Council does in fact have a local housing needs survey, funded by the District Council which was carried out independently by Devon Communities Together in 2022, which found a need for 13 dwellings over the following 5 years. Projecting that forward

indicates a local need of some 44 houses over the rest of the plan period - not 102. The Plan has clearly not been “evidence led” and therefore has to be unsound.

The employment land allocation of 4.64 hectares was not assessed at the time of the Regulation 18 consultation draft of the plan - that version at the time stated that "employment land.. will be identified...in the Tier 3 and 4 settlements on mixed use sites, to provide small scale jobs and workspaces for new and existing residents....and to reduce the need to commute to work". This 4.64 site (Otry20) was submitted by the landowner fairly late in the plan process. It is hugely out of scale with the village and its needs, and its existing infrastructure. It allocates more land in Tier Feniton for B2 industrial, B8 distribution and E(g)(ii) research and (iii) other industrial uses than that allocated to Tier 1 Exmouth, Tier 2 Axminster and Tiers 3 Seaton and Ottery St Mary, whose allocations are tiny by comparison. In addition there was inadequate consultation on this allocation at the Regulation 18 stage. Feniton Parish Council was prevented by the Committee from commenting on this site because a quirk of history puts this land within Ottery St Mary's boundary rather than Feniton's. The allocation of this site is at out of step with the plan's strategy in terms of size, location, and relativity. Irrespective of this mismatch with stated policy, access to this site is via a narrow country lane which contains two narrow humpbacked bridges (where vehicles cannot pass each other), has no footways and is in open countryside.

There is a well known and documented history of flooding in Feniton. A new flood alleviation scheme is shortly to be finished but has been constructed to deal with only the number of CURRENT houses in the village, and is as yet untested. The allocation of over 100 further houses has the potential to overwhelm this project before it has even been tested. It is well known that sewage is currently discharged into the stream near this location and at times of heavy rain, foul sewer water runs openly across people's private land. Plenty of evidence exists to show the extent of, and damage caused, by flooding.

Additionally, the village school is (and has been for some time) at full capacity. There is no room for expansion. Extra car journeys are already necessary for parents to take children to school in other towns or villages.

Public transport is poor - although there is a railway station, this has been promoted erroneously as “sustainable”, but in practice an average of only 6 people per train embark or disembark as train services are infrequent because the line is only single

track. Prices are high and trains really only allow people who work in the very centre of Exeter to get the train directly to their work, consequently most households commute to work by car.

The settlement boundary of Feniton in the cases of Feni_08 and Otry_20 has been changed without any debate in the village and is therefore undemocratic.

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.: Site Feni_08 should be removed for now to enable a review of the flood alleviation scheme to take place, and for a proper assessment of local need to take place. Any amended allocation should only be added back in if an evidence based local need assessment supports its inclusion.

Site Otry_20 should be removed “as is” in terms of size and scale. to enable proper debate within the village so that local people and the parish council can make proper representations about the site, (in terms of size , scale and location)and not continue to be excluded from this.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Miles Butler

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This is an amendment to my previous submission on the same subject. There seems to be no way of making corrections to previously submitted comments on the Commonplace system. In short, I made reference to the Feniton Housing Needs survey but inadvertently gave it a date of 2002. In fact the survey was undertaken in 2022.

Full name: Miles Butler

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of 102 houses and 4.6 acres of land for industry, distribution and research is not based on any evidence of the need for these in this location.

The Vision of the plan states in paragraph 2.6 that “Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development to meet the needs of local communities”.

The Spatial Strategy in SP01 goes on to say that “new development will be directed toward the most sustainable locations...allowing limited development at the service villages” (which include Feniton).

Policy SP01 was deliberately changed between the Regulation 18 consultation draft and the Regulation 19 plan following a debate in the Strategic Planning Committee when it was realised that in allocating 102 houses at Feniton the plan was not following its stated spatial strategy of modest development to meet local needs. The original Regulation 18 draft policy for the Service Villages echoed the plan Vision and was only changed when the Committee realised it had no evidence of the local needs in Feniton and debated whether the plan would be found to be unsound by the Inspector. Instead of finding the evidence or reducing the proposed allocation it simply amended the wording of its spatial strategy. This was a blatant contrivance (the evidence is all on the YouTube recording of the Committee).

The Parish Council does have a local housing needs survey, funded by the District Council and independently undertaken by Devon Communities Together. In 2002 it found a need in the village for 13 dwellings over the following 5 years. Projecting that forward, it would indicate a local need for 44 houses over the remainder of the plan period, not 102. The plan has not been evidence led in this instance and is therefore unsound.

The 4.64 hectare employment allocation in Feniton was not assessed at the time of the Regulation 18 consultation draft of the plan. That version of the plan stated that “...employment land ...will be identified...in the Tier 3 and Tier 4 settlements on mixed use sites, to provide small scale jobs and workspaces for new and existing residents, to improve settlement self-containment, and to reduce the need to commute to work”.

The 4.64 hectare Otry-20 site was brought forward by the landowner late in the plan process. There was inadequate local consultation on the site at the Regulation 18 stage. It is completely out of scale with the village and its needs. It represents more land to be allocated in Tier 4 Feniton for B2 industrial, B8 distribution and E(g) (ii) research and (iii) other industrial uses than is allocated in the plan for the Principal Centre Tier 1 Exmouth, Tier 2 Axminster and Tier 3 Ottery and Seaton. The employment allocations in all other Tier 4 settlements are tiny by comparison.

The allocation is completely out of step with the plan’s strategy and makes no sense. Regardless of this policy failure, the site itself is a baffling choice for industrial/distribution uses being accessed off a very narrow country lane with no footways, between two humped railway bridges and in open countryside.

Given the well known flooding history of the village, the as yet incomplete and untested flood alleviation scheme, known surcharging of the foul sewer system, a village school at capacity and incapable of expansion, poor public transport and already very high levels of car use, development of the scale envisaged in Feniton is unsustainable and premature.

The Settlement Boundary of Feniton in the case of both Feni_08 and Otry_20 has been altered to include these sites without any debate with the village about the sense of these extensions. This seems arbitrary and undemocratic.

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.: Striking out housing site Feni-08 Beechwood (a much smaller land area phased at the end of the plan period and following a long term review of the efficacy of the current flood alleviation scheme might be feasible if local demand could be demonstrated).

Striking out of employment site Otry-20 (a much smaller employment site, proportionate to the scale of the village might be feasible in a location with much better access. In reality that probably means toward the A30. Again the flood alleviation scheme needs to be tested as it is quite probable that it will result in downstream flooding of Ottery Road toward the A30, making Feniton an unsustainable location for such uses.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because the District Council has so far been impervious to the genuine, real world problems experienced in Feniton and has not corrected its mis-application of its own spatial strategy as far as Feniton is concerned. I feel that a direct approach to the Inspector is the only way to have these issues raised unless the version of the plan submitted for examination is amended.

Full name: David Carrington

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Feni_05 (Land at Burlands Mead) and Feni_08 (Land adjacent to Beechwood) - Whilst I welcome this level of increased housing provision over the 17-year timescale of the plan (and no more than this): The existing sewerage is already critically inadequate. (This is widely documented by residents, including in written responses to EDDC in many recent development proposals, and by the Parish Council.) The inadequate sewerage should be a show-stopper to further housing until rectified, due to its severe impact on quality of life and potentially health.

Otry_20 (Land to the south east of Bridge Cottages) - Whilst I welcome the local employment this site would bring to Feniton over the 17-year timescale of the plan:

- The site is totally outsized for a village location.
- The site entrance location is poor, being on a narrow lane without footpath.

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.:

Feni_05/Feni_08
Sewerage: Revise the 'East Devon Local Plan 2020-2042: Infrastructure Delivery Plan', to

include an additional Utilities Project to upgrade sewerage in Feniton. (cf the existing UTI-1 for new water mains). This to be Priority 1 infrastructure (ref Infrastructure Development Plan para 2.1), namely ‘fundamental to the delivery of the vision, objectives and policies of the Local Plan’, and should thus precede implementation of Feni_05/Feni_08.

Otry_20 (Land to the south east of Bridge Cottages) Size: Reduce the permitted area of development from 4.64 hectares to 1 hectare. Traffic management: No goods vehicles associated with the site to be permitted through Feniton old village. Achievable via weight (and perhaps width) restrictions on both Green Lane east of the site and Broad Lane. Pedestrians/cycles: A new and good quality pedestrian/cycle path from Green Lane to Ottery Road is essential for safe access. Via Greenacres Close or the adjacent strip of land, and Burlands Mead. Implementation of both measures essential before development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Elizabeth Clarke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to make comments regarding the development sites proposed for Feniton in the local Plan

I do not believe that any further land should be allocated for housing in Feniton due to the lack of infrastructure i.e. adequate access roads, school places in the primary school and at the King's School and medical services. All these services are already overwhelmed and further development is being proposed in Ottery and West Hill. The flood prevention scheme currently under construction has not yet been proven and was in any event only designed for the housing already built.

It would appear that there is a possibility of a development at Colestocks Road being foisted on the village if EDDC loses the pending court case. If this goes ahead there should be no question of any further housing being built in Feniton at all. Reports of sewage problems at the Burlands should raise an enormous red flag in relation to any development on that side of the village.

I wholly disapprove of the commercial site being proposed on the grounds of traffic that would be generated on totally unsuitable roads especially as one of the access roads is designed to flood in future.

As regards the country's need for housing I deeply believe that there is no real need for any further housing to buy as anyone in a financial position to buy can always find a house. The need is for genuinely affordable rented housing which none of the developers interested in Feniton are prepared to provide. Lack of jobs and public transport make Feniton unsuitable for this type of housing which is better placed in towns where people can walk to services and employment.

Full name: Terry Collins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In relation to Feniton, it's unclear as to whether the draft plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.
- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.
- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport. Few buses and unreliable and expensive rail service
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- The small lanes around the village are inadequate to cope with the amount of extra traffic these developments will create.

Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.

- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade. Where are the children to be educated, surrounding schools are also near capacity.
- The NHS hub in Ottery St Mary is struggling to meet the needs of the visiting population of its surrounding villages, including Feniton.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. The blind bends on either end of this lane are especially dangerous.

- The land is sustainable farmland which is much needed.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.

- Removal of Otry_20 from the draft local plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

Full name: Margaret Cornish

Other party name (if relevant): Westhaven

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Forms done in a way that some individuals unable to understand in a legalistic and bureaucratic way making it difficult to complete, as well as some non computer literate or lacking suitable equipment. A petition signed by 500 residents not taken into consideration at Strategic Planning Committee id not report. These comments I feel make it undemocratic.

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.: Correct and listen to the above 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.: Lack of sustainability. Nothing changed from 2014 super inquiry except flood prevention scheme which does not address other issues in village. Roads around village especially unsuitable for heavy traffic especially HGV's. Railway crossing has four roads leading onto it which causes back up on roads leaving to it at busy times. More traffic more chaos!! Pattersons Cross floods more flooding there village road out will used not suitable.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Kate Duggan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I'm not a lawyer so it's difficult to say, but it feels like local people's wishes are being completely ignored. Surely the point of a consultation is to actually listen and act on what you're told? A petition signed by 500 residents of Feniton and Payhembury wasn't even passed to East Devon District Council. The Common Place system makes it difficult for local citizens to have a say.

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.: There needs to be an easier way for people to respond to the consultation. So many people don't even know about the plans as they don't seem to have been well publicised. If you're not on social media, you wouldn't know there's anything even happening.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details 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 proportion of new land set aside for homes and business use in Feniton and Payhembury is ludicrous.

When it comes to Payhembury, the plans seem to have completely missed the fact that 10 new homes are already in the process of being built in this tiny village and several have been built over recent years. We've done our part! The village is already growing by around 10%. The school is oversubscribed. The secondary school is oversubscribed.

The roads are narrow. There isn't enough parking, so cars regularly block the roads. Fields flood. Roads flood to the point where they're often impassable. Many of the roads don't have footpaths next to them so it's already dangerous for people walking without adding extra traffic to the mix.

The plans for Feniton are horrific. Mass building that would completely destroy the surrounding landscape and the very feel of the village. This isn't a city suburb, it's a rural village. If people want to live in a town or suburb, they move to them.

There also just isn't the infrastructure. Feniton floods every single year. Raw sewage leaks into gardens and roads. The flood alleviation scheme underway is only designed to support the existing number of homes and won't solve the issue of the roads flooding. The school is oversubscribed. The secondary school is oversubscribed. (Lots of children are unable to get into King's anymore, despite being in the catchment.) The local GPs are oversubscribed. The roads are very narrow, unlit and there are few passing places. There would be absolute chaos with more people driving in and out every day.

The land set aside in both Payhembury and Feniton is prime agricultural land. The world is extremely unstable right now. There is every chance we are going to need the ability to grow more of our own food here in the UK. (We currently produce less than half of what our population needs to survive.) The focus should be on brownfield sites before building on our fields.

There also just isn't the local need or demand for these new homes, as shown by the Devon Communities Together survey. The Local Plan is presumably to alleviate pressure on other areas, but that shouldn't be to the detriment of people who already live here.

The plan seems determined to destroy everything that is special about living in a rural area. Meanwhile, former office buildings and shops around Exeter are lying empty or only partially used. These could be turned into homes.

Please, please, please, consider the actual evidence, the local viewpoints and the reality and reconsider the Local Plan. Visit Payhembury and Feniton when they're battling with flooding. Talk to people.

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.: Realign the Local Plan with the vision and strategy and local demand, by significantly reducing the number of homes planned for rural areas such as Feniton and Payhembury. Focus on brownfield sites and bringing empty buildings back into use. Protect village life and agricultural fields.

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.: N/A. I don't have any information on this.

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.: N/A. I don't have any information on this.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Brian Evans

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This form contravenes the EDDC policy of Equality Diversity and Inclusion, and the Equality Act 2010. It is not legal to discriminate against any particular population sector. This form discriminates against several, including those not computer literate or lacking suitable equipment. It is clear that this process of presenting comments, as applied to Feniton, has been created in a legalistic and highly bureaucratic way. This makes it difficult and daunting for many people to make their comments known. This is obviously discriminatory and undemocratic. In addition, a petition signed by more than five hundred residents (more than 25% of the population) has not been taken into consideration, as it was not submitted via the CommonPlace software, and the Strategic Planning Committee did not report the petition to EDDC, which consequently does not take these comments into account. It is therefore not democratic.

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.: Correct the errors identified in 3(b) above

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: (1) Completing such a complicated and legalistic form is difficult, time consuming and daunting to many. This makes it discriminatory.

(2) Feniton is known to suffer frequent serious flooding, by both storm water and sewerage; the new Flood Alleviation Scheme is designed to reduce flooding under present conditions, and does not take further development into account, nor the more extreme events forecast due to climate change.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

- EDDC agreed with the Planning Inspector at the 2014 Super Enquiry that Feniton was not a sustainable location for further development, and nothing apart from the untested Flood Alleviation Scheme has changed within the village to address the issues raised in that Super Inquiry.
- The only effective public transport is the railway, with trains running at two-hour intervals throughout much of the time.
- All of the roads into Feniton are narrow with pinch points, are unlit and unsuitable for heavy traffic.
- Feniton has recently had some experience of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were considerable, and walking in the area became significantly more dangerous.

- When Pattesons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are quite unsuitable and unsafe for heavy traffic. All these roads are also much used by pedestrians.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- By proposing the current development plan, EDDC is disregarding not only much evidence of unsustainability, it is disregarding its own policy as stated in the Local Plan. It is also therefore also inconsistent with the national Plan.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses for a Tier 4 community:

- Devon Communities Together (DCT) - funded by EDDC - identified a local need for only 13 dwellings up to the year 2027. The number of houses planned for Feniton in the draft plan is disproportionate and does not align to the DCT survey.
- The Strategic Policy SP01 in the Regulation 19 version was belatedly rewritten in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' as stated, but massively out of proportion for the size of community, especially when compared with development plans for other communities in the area.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location, mainly due to poor and dangerous access. The entrance to the site is off Green Lane - a mostly single-track road, widely used by pedestrians. It is unlit, with several blind rises and bends, no pavements (or space for them) and two single-track bridges. The blind junctions at either end of this lane are dangerous, even for small vehicles.
- Feni_08 is also accessed via Broad Lane, which has very similar issues to Green Lane.
- Site Otry_20 was presented after the Regulation 18 draft consultation, giving EDDC insufficient time to properly consider the evidence.

- The size of Otry_20 does not align with EDDC's Spatial Strategy and in area is completely disproportionate to the scale of Feniton, which is Tier 4. The allocation for industrial, warehousing and distribution is also quite disproportionate when compared with similar sites allocated for the Principle Centre Tier 1 Exmouth, Tier 2 Axminster, and Tiers 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: If the new draft Local Plan is to be sustainable, as stated by EDDC, Feni_08 should be removed, or drastically reduced at a minimum, and Otry_20 should be altogether removed, as its negative impacts will far exceed any potential positive effect.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: James Forbes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: No response has been given to the comments made by a large number of Feniton residents and Feniton Parish Council, during the Regulation 18 consultation stage, concerning the sites selected in Feniton for housing development. It, therefore, appears that these comments have not been conscientiously taken into account when including these sites in the Regulation 19 draft Local Plan.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The comments made by Feniton residents and Feniton Parish Council should be responded to in a manner that makes it clear that they have been conscientiously and fairly considered by the Strategic Planning Committee. Alternatively, the number of houses allocated to Feniton in draft Local Plan should be substantially reduced.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Feniton is not a sustainable location for the number of houses allocated to it in the draft Local Plan. The roads and pavements are inadequate, there continues to be problems with its drainage, public transport is infrequent, there are limited local employment opportunities, the local school is over capacity, the nearest GP practice is over subscribed and NHS dental services are inadequate. This all accords with the conclusions of the Planning Inspector at the Super Inquiry in 2014 that Feniton was not a suitable location for sustainable development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The number of houses allocated to Feniton in the Local Plan should be substantially reduced to a number that it can sustainably support.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: James Forbes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The site Otry_20 was introduced late in the Regulation 18 stage of the Local Plan consultation process, giving Feniton residence and Feniton Parish Council limited time to comment. The comments that were made were not discussed at the Strategic Planning Committee meeting and Feniton Parish Council was not allowed to express its views at this meeting. Thus, the process by which this site was selected for inclusion in the Local Plan does not appear to have been fair. In addition, the site does not comply with the relevant East Devon District Council employment development policies, SE02 and SE03.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site should be removed from the Local Plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site does not comply with the relevant East Devon District Council employment development policies SE02 and SE03.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site should be removed from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: James Forbes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The site Otry_20 after the Regulation 18 draft consultation giving very few Feniton residents an opportunity to comment. The 4.6 hectares allocated to this site is disproportionate to the size of Feniton (Tier 4). When the site proposal Otry_20 came before the Strategic Planning Committee, Feniton Parish Council was not allowed to comment.

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.: Feniton residents and Feniton Parish Council should be given adequate opportunity to comment on the proposal.

Full name: Colin William Gibbins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: I don't have the knowledge to answer the above.

But I understand Residents of Feniton were not taken into consideration as Common Place was not used.

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.: EDDCs preferred use of Common Place is very confusing and as a member of the public I wish to

comment but find this impossible to do so. I consider this is not right to make me unable to comment by this method.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.

- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.
- Volume of traffic in our narrow single track roads is unsustainable

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.

- It's well documented that roads and homes often flood with raw sewage.

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton

Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.

- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.

- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube -

<https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.

- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.

- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time

- to consider all the evidence effectively.

- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

4 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan sound, in respect of any soundness matters you have identified at 5(b) above. You will need to say why each modification will make this part of the East Devon Local Plan 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.
(Continue on a separate sheet if necessary)

If the whole draft local plan is rejected, the whole of East Devon, including Feniton could be imposed with far greater development than has been suggested. Therefore suggestions for this section are:

To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

With all the pressure from the Government to do away with Farming in the UK I will do my utmost to protect our family farm.

I have worked our land in Feniton for some 70 years, along with three generations before me. We have a huge population in the UK who need food, farmers produce food. The most important thing is food security in these uncertain times with Europe and beyond

To lose one of the best fields to housing is so detrimental due to the lack of understanding that the village is accessed along narrow roads, the whole area of East Devon suffers overloaded schools, medical services, sewerage, water run off as many others comment on each development that is proposed.

Feniton is not the place for new housing. The site beyond the Sports Field should be completed and that be the end of it.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mavis Hall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

- In previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.
- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.
- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.
- Not everyone has, or can access this form thus making the process undemocratic.

- I object strongly to these developments particularly the way the undemocratic decision is being made. Residents and the local councillors should play a significant role in the decision process.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.

- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- The FAS work being undertaken at present is untested and it is uncertain that it will be sufficient to cope with the water and drainage for at least a further 100 houses.

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.

- Lack of adequate public transport. Few buses and unreliable and expensive rail service
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- The small lanes around the village are inadequate to cope with the amount of extra traffic these developments will create.

Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.

- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade. Where are the children to be educated, surrounding schools are also near capacity.
- The NHS hub in Ottery St Mary is struggling to meet the needs of the existing population of its surrounding villages, including Feniton.

- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.

- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.

- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.

- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.

- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

- There is a downturn in the construction industry, the availability of building materials is in question, unless imported, there is also a shortage of skilled labour. Acland Park is not finished due to issues with the building company leading to vandalism, rats and dumping of waste-this is something that needs to be avoided in other developments.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. The blind bends on either end of this lane are especially dangerous.
- The land is sustainable farmland which is much needed.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.

- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

- Removal of Feni_08 from the draft local plan
- Removal of Otry_20 from the draft local plan.

Full name: Anissia Halwyn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: My comments relate to Strategic Policy SD18: Development allocations at Feniton and cover the following issues: -

- Surface water flooding – Feniton is vulnerable to significant surface water flooding, which is generated due to a combination of run off from poorly managed agricultural fields and the existing expanse of non-permeable tarmac and concrete within the village. Surface water flood risk has not been made viewable on the interactive map. Whilst works are taking place to alleviate some of this pressure, the scheme has not been completed nor monitored yet so it is unclear how effective it will be. The flood scheme has presumably also been designed with capacity to alleviate flooding based on the current village extent and therefore the current maximum potential surface water volumes, potentially incorporating climate change projections. Adding to the urban creep of the village onto greenfield sites would inevitably increase surface water runoff. This would especially be the case where there is a disproportionate increase of residential area such as at Beechwood (Feni_08), which would convert well-managed, permeable farmland into a large expanse of tarmac and concrete. This has the potential to increase flood risk within the village. Instead of building on permeable green areas and farmland, we should be aiming to conserve and sustainably manage these areas to improve surface permeability.

- Traffic – Residential and industrial development will lead to an increased volume of traffic in the village, which is only accessible via small country roads. Access to Feni_08 and Otry_20 is via a narrow, single laned road with two humpback bridges (with blindspots due to steep gradients) – these sites would not be safely accessible on the existing roads, especially when considering the significant increase in traffic. Increased

congestion on many of the roads around Feniton, including Ottery Road, will be inevitable due to them being narrow country roads. This will also make the roads become even more unsafe to cycle and walk on. In TR01 it states that “New development (specifically including where land is allocated for development) should facilitate access to high quality public transport through its location, layout..... development should be aligned with Devon County Council’s Bus Services Improvement Plan ” – Feniton currently only has one infrequent bus service to Sidmouth and none to Exeter, and is not considered for improvements within DCC’s BSIP. In addition, the rail service to Exeter/Waterloo is two hourly and cancellations/delays are commonplace due to problems posed by the single line between Pinhoe and Axminster. Travelling by car is therefore, unfortunately, the default option for the majority of residents in Feniton, as options are limited otherwise. As a result of the flood alleviation scheme, Kier have stated that there will be an increased risk of flooding of the road out of Feniton at Patteson’s Cross. Ottery Road was recently closed for works, which led to chaos as large volumes of traffic were diverted onto the (even) smaller roads towards old Feniton and Talaton, causing significant congestion. It is almost certain that this issue will re-occur in the future due to flooding at Patteson’s Cross –increased volumes of traffic would significantly exacerbate the problem.

- Travelling by foot/cycle – In TR01, it states that “Development which would result in the loss or reduce the convenience or attractiveness of an existing or proposed footpath, cycleway or bridleway, will not be permitted unless an acceptable alternative route is provided.” In the draft LCWIP, the Otter Trail linking Feniton with Sidmouth was proposed to be an on-road route. Roads around Feniton are already not the safest (due to the points above), especially for children cycling to secondary school in Ottery, but increased traffic due to the developments would most definitely compromise the safety and ultimate useability of the on-road Otter Trail. The site opposite Bridge Cottages (Otry_20) is adjacent to one of the only footpaths in the village, which is a large orchard – very beautiful all year around and excellent for wildlife spotting. The industrial development will significantly reduce the attractiveness of this right of way.

- Biodiversity – Being in a rural location, Feniton is a hotspot for wildlife. This is evident in the surrounding fields – it is commonplace to see deer, foxes, birds of prey and many more species making use of the available green space and agricultural fields surrounding the village. The proposed developments would reduce this available (supporting) habitat, with the proposed development at Beechwood and Bridge Cottages in particular having high potential to cut off valuable habitat corridors between the surrounding countryside and remaining green spaces in the village. The statement under the Beechwood development, that “Careful designed and implemented boundary treatment on the eastern side of the site will be required to form a soft edge to the countryside beyond” will do nothing to mitigate this significant issue and should be considered a greenwashing exercise.

- In the Biodiversity and Geodiversity chapter, it states in para 13.39 “Trees, woodlands, and hedges are vital for enhancing landscapes, providing wildlife habitats, supporting sustainable drainage, sequestering carbon, and improving public health.”. The site at Otry_20 is an orchard, which is not only likely to contribute to habitat connectivity, but also contributes to landscape character due to the region’s important history of hosting extensive orchards.
- Infrastructure – Feniton does not have adequate infrastructure to support further development. I have already mentioned factors such as the state of the roads and the railway, but an additional factor is the small size of the school, which is working at full capacity and would not be able to accommodate an increase in numbers.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The proposals to develop on greenfield sites within Feniton do not align with the following policies:

- Policy TR03: Travel plans, transport statements and transport assessments
Where development is likely to generate significant amounts of vehicle movements, planning permission will not be granted unless they are supported by a transport statement or transport assessment, and subsequent travel plan, that identifies measures to secure new sustainable travel arrangements, taking into account: A. The scale of the development; and B. The availability of public transport, walking and cycling opportunities; and C. Proximity to environmental designations; and D. Cumulative impacts of other development in the area; and E. Whether there are particular types of impacts that require further evaluation.
- TR01 p3 Walking, wheeling, cycling and public transport should be the natural first choice for short local journeys, or as part of a longer journey. Walking and cycling routes must be prioritised in new development (specifically including where land is

allocated for development) – such routes should be coherent, direct, safe, comfortable and attractive.

New development (specifically including where land is allocated for development) should facilitate access to high quality public transport through its location, layout, and, where necessary, contributions to public transport services and/or facilities (for example, bus services, bus stops, bus priority measures, rail infrastructure). In particular, development should be aligned with Devon County Council's Bus Services Improvement Plan

Development which would result in the loss or reduce the convenience or attractiveness of an existing or proposed footpath, cycleway or bridleway, will not be permitted unless an acceptable alternative route is provided.

- Policy PB08: Tree, hedges and woodland on development sites Retention of existing trees and hedges Where trees are present on a development site proposals will need to be designed, and schemes implemented, in a manner that retain good quality and healthy woodland, trees and hedgerows. This is to specifically include protection of : ancient woodland; ancient and veteran trees; those with visual amenity value; those that support wildlife (such as some appropriate U category trees as part current BS 5837111) or provide habitat connectivity; those which positively contribute to local landscape character, the historic environment or the significance of a heritage asset and its setting; and rare or unusual species of trees. These protected assets will need to be incorporated into the overall design and landscape scheme, within public spaces where possible

- Policy AR01: Flooding

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The proposal to develop opposite Bridge Cottages is within the Ottery ward, despite clearly being in Feniton. I am concerned that objections to any

future development from Feniton Parish Council and residents will not be adequately considered, due to the boundary issue. Any development at this location has the potential to negatively impact residents in Feniton, due to the conversion of a biodiverse orchard to industrial buildings, impact on the adjacent public right of way and impacts on traffic volumes due to the poor connectivity via sustainable transport between Feniton and Ottery and surrounding villages.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: will halwyn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I am concerned that the drainage and flooding issues in the village are not sufficiently considered which will cause damage to existing properties.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details 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 topography of new feniton as a whole is a shallow bowl, without natural drainage and relatively little drop for sewerage and drains. This has caused problems with surface water and sewage in the village. There is currently a scheme in place to try to reduce this for the worst affected properties. It seems concerning that edcc is keen to push ahead with development before the effects and effectiveness of this scheme can be observed. Kier have stated that it will likely increase flooding in other areas i.e. roads in and out of the village. I feel it is somewhat cynical to try to push development through before any further issues can be observed. Fenitons flooding and sewage issues were recently mentioned in parliament, with effluence flowing into the ditches in peoples gardens; this is not a system with spare capacity. In the case of feni-08, there have historically been issues with flooding into adjacent land from runoff when this field was poorly managed. Sewerage and drainage on green lane properties is old, and unable to deal with further input. For both feni-08 and otry-20; Green lane is a rural lane which forms the pedestrian, cycle and horse connection between the new and old village, and allows access to two footpaths. This lane should be preserved and enhanced as a community amenity, for active transport and recreation. The lane includes two humpback bridges and does not have pavement. Increased traffic on this lane will result in danger to inhabitants who are using it for active transport i.e. school runs, exercise,

commuting, and thus encourage further unnecessary car usage. There is a plan to link feniton to ottery through a cycle route along the old railway line which joins to green lane, and so it should be planned to form part of a wider safe-cycle network in devon, rather than encouraging further car obstruction these rural lanes.

In the case of all development in feniton; it is optimistic to think the railway will absorb all traffic; it is used by a minority of residents, and reliability needs to be improved. Feniton has almost no bus service. Therefore in feniton and surrounding villages it must be assumed that many journeys will be completed by road. This leads to the risk that the villages in this area become cut off from surrounding green space, and active transport to surrounding villages due to the increased risks in the lanes.

Amenities; GP service are in ottery (poor access by car) and are oversubscribed.

I feel that the proposed developments in feniton contradict the objectives set out in the vision. I do also feel that there should be a principle of proportional development of any settlement, to allow the effects to be seen, rather than the glut of proposals that seem to be targeting feniton in a short time should be taken.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of feni-08 and otry-20. Green lane to be included as part of a wider safe active travel network.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I feel that the glut of proposals before the effects of the flood scheme can be measured is cynical.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like to participate.

Full name: Linda Hamilton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(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.: Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Otry_20: I consider that the allocation of employment land at Otry_20 is wholly inappropriate, given that the site is located off Green Lane, a very narrow single-track lane with two humpback railway bridges, severely impeding vehicular visibility. No footpaths are present and the creation and operation of an employment site in this location would place pedestrians in extreme danger; this is a lane used by numerous families to walk their children between home and the village primary school, and for secondary school children to walk to and from their bus stop to Kings School on Ottery Road. It is also used by many dog walkers in Feniton, who walk along Green Lane as part of a loop around the village. Green Lane is of significant amenity value to villagers. In addition to this, the narrow blind bend on Ottery Road between the A30 and the turn into Green Lane in Feniton is extremely dangerous; the addition of numerous large industrial vehicles using this road would lead to very dangerous conditions for pedestrians and cyclists (who often move between Feniton and Escot estate) and would make conditions for all road users extremely difficult. There are already numerous near-misses at the junction of Green Lane due to poor visibility and backed-up vehicles. The road between the A30 and Green Lane is regularly flooded after rainfall (and this will be exacerbated once the flood defence scheme is operational as more water will flow over Ottery Rd). When this occurs, large vehicles would be forced to travel through Fenny Bridges, along single track Green Lane and over the railway Bridges, or to access the site via Payhembury from the north and over the level crossing in Feniton, both of which would be wholly unacceptable. There is no reason for employment land to be allocated in this location – Feniton is not close to commercial centres where large articulated

vehicles would need to move to and from. It would simply be bringing large vehicles into an inappropriate area to destroy the amenity value of that area for residents. The recent flood scheme in the village has resulted in increased vehicular movements on Green Lane (due to location of site compound), with multiple construction vehicles and deliveries and movement of aggregate and concrete. The result of this has been chaos on the lane, with traffic stopped and reversing, children, pedestrians and cyclists being put in danger. This simply cannot be allowed to be the permanent situation. Pg 37 of the draft Local Plan states: E(g)(i) Office use - to be primarily located in the town centres of tier 1 and 2 settlements and the proposed new community. Office use will be permitted on site allocations as an ancillary part of other business uses. E(g)(ii) Research and Development and (iii) industrial use (which can be carried out in any residential area without causing detriment to the amenity of the area)- will be met through employment site allocations, alongside larger housing developments as allocations and as windfall development. I have no doubt whatsoever that the allocation of employment land at Otry_20 would be of significant detriment to the amenity of the area and thus this allocation is contrary to the Strategic Policy SP04: Employment provision and distribution strategy The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton. It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton. Similarly, any vehicular access to the proposed housing allocation Feni_08 from Green Lane, would be totally inappropriate, for the reasons given above with respect to this single-track lane. Green Lane is simply not of sufficient size for additional traffic volumes, and given the railway bridges present on it, cannot be widened to be appropriately sized. Furthermore, Broad Rd at the other side of Feni_08 is a single track road which leads past the primary school. The quantum of housing proposed for this site needs to be reconsidered in light of these constraints. References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20 Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village,

leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.

- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency. References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy AR01 – C Disproportionate allocation of houses compared to local need:
- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village. References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E. Sewage:
- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage. References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy AR01 – C Lack of Sustainability: At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.

- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035. References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jennifer Harper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: "I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which "could be developed" which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be "squaring off the built edge". This "built edge" dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression."

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.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: "To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid

rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one."

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity).

Full name: Sarah Harper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

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Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid

rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emma Hayes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.
- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.
- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Flooding:

- It is well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage which appears to be an increasing incidence, with individuals experiencing roads and gardens impacted during heavy rain.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- The bridge before the A30 at the other end (past Fenny Bridges) also floods very badly and increasingly frequently, and other roads are more like unmetalled roads as they are in such a state of disrepair due to erosion and potholes with increasing amounts of traffic.

- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive. I live in the old village and the road was constantly backed up, the school bus was so late that I was taking the children to school and at times it took over 40minutes due to heavy plant not being able to pass and multiple cars on the road from Fenny Bridges backed up to Feniton. The road was dangerously overpopulated with cars, lorries, farm machinery etc. with no traffic system or adequate passing places and huge disruption day and night.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.

- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.

- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.

- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.

- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Via the Parish Council to have the views of Feniton Residents represented

Full name: Pamela Hayman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This village cannot take anymore building, sewage & traffic!!

Full name: Sue Jeacock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I have no idea whether this is legally compliant. But there is no don't know option in this survey question. I have just watched the EDDC info film on the local plan on you tube and the plans for Feniton do not fit with your stated aims of putting the right development in the right place and limited development in the villages. Feniton is being asked to take a large proportion of new development relative to its size, compared with other similar sized villages. The density of the proposed development at Burlands certainly does not fit with the ideal of the right sort of homes in the right place and and the proposed industrial site off Green Lane, a single track lane with no pavements regularly used by school children, dog walkers and pedestrians is horrifyingly unsuitable. I would question the demand for housing in the area, given that the development at Acland Park faltered, leaving houses unfinished and the developer seemingly gone bust. If he couldn't make his business model work in a property boom, I can't see how new houses proposed now will sell any better. Perhaps the other houses could be finished and sold first? The 60 houses proposed in Fen 08 are in a location EDDC previously argued, with the help of expensive lawyers, at the super enquiry was unsustainable for development. Nothing has changed since, so again this cannot be development in the right place. I also understand our parish councillors were prevented from speaking about the inclusion of Otry 20 in the plan because it is technically classed as Ottery. However it clearly hugely impacts the village and has been included in the Feniton section in your plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I have just watched the EDDC info film on the local plan on you tube and the plans for Feniton do not fit with your stated aims of putting the right development in the right

place and limited development in the villages. Feniton is being asked to take a large proportion of new development relative to its size, compared with other similar sized villages. The density of the proposed development at Burlands certainly does not fit with the ideal of the right sort of homes in the right place and the proposed industrial site off Green Lane, a single track lane with no pavements regularly used by school children, dog walkers and pedestrians is horrifyingly unsuitable. I would question the demand for housing in the area, given that the development at Acland Park faltered, leaving houses unfinished and the developer seemingly gone bust. If he couldn't make his business model work in a property boom, I can't see how new houses proposed now will sell any better. Perhaps the other houses could be finished and sold first? The 60 houses proposed in Fen 08 are in a location EDDC previously argued, with the help of expensive lawyers, at the super enquiry was unsustainable for development. Nothing has changed since, so again this cannot be development in the right place.

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.:

Hugely reduced number of dwellings for Fen 05 - 15-20 would be what the site could sustain, but only once problems with sewage overflow in that area have been resolved. Otherwise the new estate will be swimming in sewage which might make it a bit tricky to sell the homes. Plans for the industrial site Otry 20 need to be removed from the Local plan, as does Fen 08. As you state yourselves, development needs to be the right sort of development in the right places and Feniton has been shown not to be a sustainable location for additional housing on this scale.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I don't believe you have listened to our parish council at all. And parish councillors were prevented from speaking on Otry 20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Kerry Johnstone

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I don't feel qualified to judge whether the draft local plan for Feniton has been developed appropriately from a legal point of view. However, I understand that views expressed to date have not been taken into consideration, despite emails, comments and a petition signed by many residents (over 500!). The Strategic Planning Committee has not been presented with the views of the residents of Feniton, and this seems wrong. Requiring comments to be made through a system that is extremely hard to navigate by a member of the general public is tantamount to discrimination and hardly embraces democratic principles.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Flooding and sewage

Feniton already struggles with flooding and is undergoing a Flood Alleviation Scheme that at best will help protect existing homes from further flooding. Unfortunately, the current plan increases the flooding risk at the main access route to the village. So even the current scheme does not adequately tackle the problem of flooding, and it is unclear how effective it will be in addressing flood risk for existing homes.

Further development, without an appropriate Flood Alleviation Scheme in place, will undermine existing efforts, put existing and new homes at increased risk of flooding, as well as further increase the likelihood of more flooding at Pattersons Cross. Further development without increasing the capacity of Feniton's sewerage system will also cause more instances of raw sewage flooding along roads and homes in Feniton.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability

I am struck by the scale of the planned developments, which seem to be out of all proportion to the current size of Feniton. It is not clear to me why the proposals don't fit with the local plan's stated vision and strategy. If nothing has changed since the 2014 Super Enquiry that concluded Feniton was not a sustainable location for further development, why is Feniton now considered suitable for substantial further development?

As mentioned above, the Flood Alleviation Scheme has not been designed to cope with many extra homes, and already increases the risk of flooding at the main entry to the village. The FAS therefore does not constitute a significant positive change that would justify overturning the recommendations of the 2014 Enquiry.

Furthermore, Feniton's roads will not be able to cope with a significant expansion to the number of houses in the village. The increased traffic experienced when the Ottery Road and Green Lane junction was closed recently led to significant traffic problems, including cars diverting through Old Feniton along single country lanes, causing congestion and on at least one occasion, preventing a school bus from getting children to secondary school. The increased flooding risk at Patterson's Cross will also lead to diversions through Old Feniton. These roads simply can't cope with a rise in traffic and will have a significant negative impact on home owners and car users in and around Feniton.

There are also issues with lack of capacity at Feniton Primary School and lack of GP Services. Several of my neighbours were unable to enrol their children into Feniton Primary School despite being a 10 minute walk away.

It is not clear to me on what grounds a substantial expansion of Feniton has been judged as sustainable.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need

The number of new houses proposed far exceeds local need. Devon Communities Together identified the need for 13 new homes up to 2027. This assessment was funded by EDDC. I understand that the Chairman of the Strategic Planning Committee re-wrote the Strategic Policy SP01 in the Regulation 19 version, in order to justify substantially increased development of Feniton well beyond local need. This has led to a significant mismatch between Vision and Strategy. Proposed development in Feniton is not ‘limited’ – it is excessive for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20

The plan to have an Employment site and an entrance to the site just off Green Lane is hugely problematic. Green lane is a favourite for pedestrians and dog walkers, is mostly a single track road, with a substantial parts of it not wide enough for a car to pass a walker comfortably. It is unlit, has pinch points, blind bends, and no pavements. It also has an ancient sunken portion subject to rock falls, blocking the lane. It seems highly inappropriate to construct an Employment site at the current planned location with an entry/exit onto Green Lane. I feel that the EDDC need to review the evidence more carefully to make a more informed decision. Furthermore, the proposed size of Otry_20 is inconsistent with EDDC's Spatial Strategy and is once again disproportionate to the scale of Tier 4 Feniton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spacial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I strongly feel that the Tier 4 status of Feniton should be properly reflected in the proposals, so that the Strategy and Vision can be re-aligned. This would mean imply removing Feni_08 and Otry_20 from the draft local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Matthew John Keen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

In relation to Feniton and the draft local plan, I argue that the general public's lack of detailed planning knowledge may result in an imbalance between public participation and the planners' expertise, potentially leading to decisions that are not fully representative of the community's interests. My point are.

1. Access to Information: A key argument is that the public may not have had adequate access to the necessary information or resources to understand the complex aspects of the draft local plan. This lack of transparency could lead to a situation where the planners, who are familiar with technical planning details, have an unfair advantage in shaping the final plan.

2. Engagement and Consultation: The consultation process may not have been designed in a way that actively encouraged or facilitated meaningful participation from the general public. This could be seen as an issue if the planners relied on public feedback that was not fully informed or representative due to barriers such as limited

time for consultation, jargon-heavy documents, or insufficient outreach to underrepresented groups.

3. Complexity of the Plan: Planners often use technical language and complex planning terms that may be inaccessible to the general public. This complexity could be seen to skew the process in favor of the planners and limit the public's ability to provide informed, constructive feedback.

4. Bias Toward Planners' Expertise: There could be a perception of bias where the planners, due to their expertise and experience, may disproportionately influence the plan in ways that do not fully account for the preferences or needs of the local community, especially if the public's input is not adequately considered or if the planners dismiss concerns that could be seen as less "technical."

5. Legal Compliance and Fairness: If the consultation process or the way the local plan has been developed is not legally compliant (e.g., failure to meet statutory requirements for public consultation or accessibility), it could be argued that the process has not been fair, which may undermine the legitimacy of the plan.

I argue that the lack of consideration for the emails, comments, and petition from over 500 residents could indicate bias in favor of developers, and not adequately consider the views of Feniton residents.

"I believe that the consultation process for the Feniton development has been flawed in that substantial public input—specifically emails, comments, and a petition signed by over 500 local residents—was not given due consideration simply because it was not submitted through the Common Place platform. This restriction may have unduly limited the scope of public engagement and resulted in the voices of the community being sidelined in favor of developers' interests.

The fact that these responses were dismissed due to the format of submission could be argued to demonstrate a systemic bias that favors the developers' position, as opposed to a fair and transparent process that genuinely takes into account the concerns and views of local residents. Public consultation is a critical component of the planning process and must be inclusive, accessible, and responsive to all forms of input, not just those submitted via specific channels that may not be accessible or widely known to all residents. By disregarding legitimate forms of input from a large group of residents, the process risks undermining the principles of fairness, equality, and genuine community involvement in the planning process."

Additional Points

1. Inclusivity of Consultation: A truly inclusive consultation process should allow all forms of feedback, particularly in a community as engaged as Feniton. The failure to consider the petition and individual emails could be perceived as a procedural oversight that disproportionately disadvantages the community.

2. Bias Toward Developers: The rigid reliance on the Common Place platform, which may not have been widely promoted or accessible to all residents, could create an unintentional bias towards the developers' interests. Developers and planners are typically aware of and comfortable with formal submission processes, while local residents may not be as familiar with these platforms.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Feniton is a community that is all too familiar with regular flooding, a problem that has been well-documented over time. Yet, it appears that East Devon District Council (EDDC) has overlooked the historical evidence of flooding, including instances of raw sewage being released into the environment.

The reality is that further development will only exacerbate the flooding situation. Promises made by previous developers to alleviate flood risks have, to date, not been fulfilled, leaving residents vulnerable.

The Flood Alleviation Scheme (FAS) was designed to accommodate only the current number of homes in Feniton, and its limited scope means it merely diverts floodwaters to the eastern side of the village. This shift will result in increased flooding at Pattersons Cross, the main access route to the village from the A30, which already becomes impassable during heavy rainfall—without the added burden of redirected floodwater.

Despite millions of pounds of public money having been spent on the scheme, there is no tangible evidence to show that the FAS is effective in reducing flood risk, leaving Feniton's residents facing ongoing, unresolved flood threats. The situation demands urgent reassessment, as the current approach is insufficient to protect the community and prevent future disasters.

It is an undeniable fact that our sewerage system is operating beyond its capacity, leading to stormwater overflows that enter the drainage system, intensifying the risk of sewage flooding. This critical issue is not only unresolved but continues to threaten the health and safety of our community.

The evidence is clear and well-documented: roads and homes regularly flood with raw sewage, creating hazardous conditions and significant distress for residents. The severity of this problem is highlighted in Chapter 2 The Vision, Objective 1, and Chapter 7 Flood Risk Strategic Policy AR01 – C, which emphasize the urgent need for action.

This ongoing failure to address the underlying issues of the sewerage system exposes our community to unacceptable risks, and it is imperative that this is rectified before further development compounds an already critical situation.

At the 2014 Super Inquiry, the Planning Inspector, with the full agreement of East Devon District Council (EDDC), determined that Feniton was not a sustainable location for further development. Nothing has changed since that determination—aside from the untested Flood Alleviation Scheme (FAS)—to address the significant issues highlighted during that inquiry.

Feniton remains critically underserved in several key areas:

Public transport is woefully inadequate, offering limited options for residents.

All roads into Feniton are narrow, with dangerous pinch points, poor lighting, and are ill-suited to handle heavy traffic.

The recent closure of the Ottery Road/Green Lane junction for FAS works provided a stark reminder of how vulnerable the village is to traffic congestion. Delays in and out of the village were extensive, showing how even temporary disruptions can severely impact daily life.

When Pattersons Cross floods—as is expected with increased rainfall due to the FAS—all traffic will be forced to reroute through Feniton Old Village or via a series of narrow lanes connecting to the A373 and M5. These routes are unsuitable and unsafe for heavy traffic, posing a serious risk to public safety.

Feniton Primary School is already at capacity and urgently needs expansion, yet there are no plans to address this growing demand.

Local GP services are also at capacity, struggling to meet the needs of the community.

Despite all of this, there has been a clear disregard for the planning history and evidence that show this scale of development in Feniton is unsustainable.

The proposals for Feniton directly contradict the vision and strategy outlined in the local plan, and by extension, they are at odds with national policy. Continuing to push for development in Feniton, given the current infrastructure and services, is not just impractical—it is irresponsible. The issues raised in the 2014 inquiry remain unresolved, and any further development would exacerbate these problems, rather than solve them.

Funded by East Devon District Council (EDDC), Devon Communities Together (DCT) conducted a survey that identified a clear local need for only 13 dwellings in Feniton by 2027. Yet, the number of houses planned for Feniton in the draft local plan is shockingly disproportionate to this identified need and fails to reflect the findings of the DCT survey, which was itself funded by EDDC.

When the Strategic Planning Committee realized that the number of houses allocated for Feniton far exceeded the local demand, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, altering the plan to justify the inflated development proposal. This revision has created a serious mismatch between the stated vision and the actual strategy, leaving the local community vulnerable to unchecked overdevelopment that does not align with their needs.

The proposed development for Feniton is no longer ‘limited’—it is massive for a Tier 4 village, and it threatens to undermine the character and sustainability of the settlement.

The scale of this proposal contradicts the principles outlined in Chapter 3 (3.4 Hierarchy of Settlements) and Chapter 5 (Strategic Policy SD18), which emphasize the need for balanced, context-sensitive growth. Furthermore, Strategic Policy SP01 (C, D, E) underscores the need for a strategic approach that prioritizes local needs and sustainable development, principles that are clearly being disregarded.

This proposal is not just misguided; it is an imposition on Feniton's future, one that risks harming the very essence of the community. The voices of local residents and the evidence from the DCT survey must not be ignored. Feniton deserves a plan that respects its scale, infrastructure, and genuine needs, not one that prioritizes growth for growth's sake.

Site Otry_20 is located in an area that poses significant safety concerns. The only access point to the site is off Green Lane, a narrow, single-track road that is often not wide enough for cars to pass pedestrians without the pedestrian having to step into the hedge. It is unlit, has dangerous pinch points, blind bends, and a complete lack of pavements, making it extremely hazardous for pedestrians, cyclists, and drivers alike. There are also two single-track, over-the-railway-line bridges, one of which is situated at a blind bend. Furthermore, a section of the lane is an ancient sunken portion, which is susceptible to rock falls, frequently blocking the road.

The dangers of Green Lane are starkly illustrated in a video available on YouTube, which details many of these issues. The blind bends at either end of this lane are especially treacherous, and they pose a real risk to anyone attempting to navigate this route, whether on foot or by vehicle.

Similarly, Feni_08, which is also proposed for development, is accessed via Broad Lane, which shares many of the same hazards as Green Lane, including narrowness, lack of lighting, and dangerous bends. This further compounds the concerns over the safety of the proposed developments.

It is concerning that Otry_20 was brought forward for consideration after the Regulation 18 draft consultation, leaving EDDC with insufficient time to properly review all the

relevant evidence and consider the full scope of the safety risks. As a result, this site has not been adequately scrutinized, and the community's concerns have not been fully addressed.

Additionally, the proposed size of Otry_20 is entirely out of step with EDDC's Spatial Strategy and is grossly disproportionate to the scale of Feniton as a Tier 4 settlement. This overdevelopment would place an immense strain on local infrastructure, safety, and the environment. The allocation for industrial, warehousing, and distribution uses on Otry_20 is also disproportionate compared to similar employment sites in Tier 1 (Exmouth), Tier 2 (Axminster), and Tier 3 (Ottery St Mary and Seaton), further highlighting the mismatch between the development and the intended role of Feniton as a small rural village.

The development of Otry_20 contradicts several key objectives laid out in the Spatial Strategy—particularly those outlined in Chapter 2 (The Vision), Chapter 3 (The Spatial Strategy), and Strategic Policy SP01 (C, D, E). These documents emphasize the importance of sustainable, context-sensitive growth that aligns with the needs and capacities of each settlement. Otry_20, in its proposed scale, flies in the face of these guiding principles and would undermine the integrity of Feniton as a small, rural community.

The proposed development at Otry_20 is unsafe, unsustainable, and misaligned with the broader objectives of the local plan. The risks to safety, infrastructure, and the community's wellbeing are too significant to overlook, and this proposal must be reconsidered with the utmost care.

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.: For the sake of our community's future, and to preserve the very heart of Feniton, we must call for a plan that reflects the reality of our village's needs and limitations. Feniton is a small, Tier 4 settlement—an area that simply cannot bear the weight of excessive development without losing its essence. We urge the decision-makers to take a step back, realign the

strategy and vision, and ensure that growth is sustainable and in harmony with our community's true needs.

We ask for the removal of Feni_08 from the draft local plan, or at the very least, a drastic reduction in the number of houses allocated for Feni_08. Our village has already stretched its resources to the limit, and further overcrowding will only lead to a loss of what makes Feniton so special. Our schools are at capacity, our roads are already struggling, and our infrastructure cannot keep up. This is not just about numbers—this is about preserving the spirit of Feniton, the place we call home.

We also ask for the removal of Otry_20 from the draft local plan entirely. The proposed development threatens to overwhelm our narrow lanes, flood-prone areas, and already fragile community services. It's too much, too fast, and it will irreversibly change the landscape we hold dear. The heart of Feniton beats in its quiet, close-knit nature, and we fear that if these plans go ahead, we will lose that forever.

Please, listen to the voices of those who have lived here, loved here, and built their lives here. We deserve a plan that respects Feniton's character, its capacity, and its future. The time to act is now, before it's too late.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jamie Lawrence

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(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.: N/A

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I can't comment on whether the draft local plan has been developed in a legally-compliant way, as I do not have legal training and am not privy to the processes followed.

However, it is important to point out that in previous consultations, feedback from the community – including a petition signed by over 500 residents – was not taken into consideration because it did not come via Common Place.

This very important feedback from the local community was not reported to the Strategic Planning Committee by EDDC, undermining and ignoring the views of those from Feniton with both knowledge and a stake in the future of the village.

The Common Place system, EDDC's preferred method of commenting, is complex and time-consuming to use, making it harder for residents – especially those lacking digital skills – to make their views known. This is discriminatory, undemocratic and goes against British Values.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: N/A

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(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.: N/A

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Overall, the proposals feel rushed, ill thought through and at odds with infrastructure constraints in the village. My major concern is the lack of sustainability with these proposals.

Notably, at the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development. What has changed since then? Only the Flood Alleviation Scheme (FAS) has started.

Overall, it feels there has been a total disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.

Community cohesion within the village would be destroyed, with the current residents feeling disregarded and unvalued, with our concerns and lives being steamrolled by a Council which doesn't understand the area or our concerns, and new residents being brought in who will be adding to the issues of our village. The "old" and "new" residents will struggle to co-exist peacefully, and presumably this community cohesion has been disregarded in any planning.

In terms of sustainability, there are multiple serious issues. Firstly, a lack of adequate transport. All the roads into Feniton are very narrow, with major pinch points, they're mostly unlit and unsuitable for heavy traffic. This became very apparent recently when the Ottery Road/Green Lane junction was closed for the FAS works. Delays were inevitable and extensive and disruptive. This would get a lot worse under the new proposals.

Flooding at Patterson's Cross would also be a major issue. It will flood during heavy rain, as noted by the FAS developers. All vehicles will then need to access the village via the Old Village, or via the A373 and M5. These lanes are not suitable for heavy traffic, which will get much worse should the proposals go ahead.

Furthermore in terms of infrastructure, the current primary school in Feniton is at capacity and in need of a building upgrade, which could not happen on the current site as it is not big enough. Local GP services are also at capacity – where would the residents in the new houses go?

The only concession to the infrastructure challenges in the proposals seems to be 1060m of new water mains pipes to be laid by 2035.

Specific comments related to flooding and sewerage in the village:

Flooding is a massive issue in Feniton and it does not seem like EDDC has considered historic flooding, including raw sewage, when putting together these proposals. Previous promises of flood risk alleviation measures from developers have not resulted in any action.

The Flood Alleviation Scheme (FAS) developers have said that it will increase the flooding risk at Patterson's Cross, which already floods in heavy rainfall. Adding more houses – and increased flooding risk from the development, without additional alleviation measures – seems ill-advised. The FAS has been designed to handle the existing flooding risk, not scoped to deal with increased risks from major developments.

Finally, it's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding. It is well documented that roads and homes often flood with raw sewage.

Specific comments on disproportionate allocation:

Devon Communities Together (DCT) identified a local need for only 13 new dwellings up to the year 2027 – this was funded by EDDC. Therefore the number of new houses in the draft plan does not make any sense and is in no way aligned to what was identified in the survey.

After the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy. How can this in any way be justified?

Overall, the proposed development is massive for a tier 4 village and can't be justified in any way based on local need.

Specific comments on employment site, known as Otry_20:

I do not understand the thinking behind this location, the site is fundamentally unsafe.

The entrance will be off Green Lane, a mostly single track road – with some parts not even wide enough for a car to pass a pedestrian without the pedestrian pressing themselves into the hedge. The road is unlit, has many pinch points, blind bends, very few pavements and two single track bridges over the railway line, one of which has a blind bend. See this video on YouTube detailing some of the massive issues here: <https://www.youtube.com/watch?v=6q7DQ6mpgh4>.

It should also be noted that Feni_08 accessed via Broad Lane has very similar issues to Green Lane.

Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. How has EDDC even had enough time to consider all the evidence effectively to make a decision? Especially in light of how big the site is and its impact on the village. The sheer size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

It also has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton. This makes absolutely no sense and is negligent considering Feniton is a Tier 4 Village.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy AR01 – C Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45 Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E. Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The plan needs to be sustainable – and that means reflecting the Tier 4 status of Feniton in these proposals. The Strategy and Vision needs to be realigned, until adequate infrastructure and mitigation has been put into place.

In terms of actions, that means:

Removal of Feni_08 from the draft local plan, and at least a reduction in the number of houses allocated for Feni_05.

Removal of Otry_20 from the draft local plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

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.: N/A

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.: N/A

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.: N/A

Full name: Jamie Lawrence

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I can't comment on whether the draft local plan has been developed in a legally-compliant way, as I do not have legal training and am not privy to the processes followed.

However, it is important to point out that in previous consultations, feedback from the community – including a petition signed by over 500 residents – was not taken into consideration because it did not come via Common Place.

This very important feedback from the local community was not reported to the Strategic Planning Committee by EDDC, undermining and ignoring the views of those from Feniton with both knowledge and a stake in the future of the village.

The Common Place system, EDDC's preferred method of commenting, is complex and time-consuming to use, making it harder for residents – especially those lacking digital skills – to make their views known. This is discriminatory, undemocratic and goes against British Values.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: N/A

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

NOTE: I am unable to attach my name to this form in Commonplace. My name is Jamie Lawrence and I am a resident of Feniton.

Overall, the proposals feel rushed, ill thought through and at odds with infrastructure constraints in the village. My major concern is the lack of sustainability with these proposals.

Notably, at the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development. What has changed since then? Only the Flood Alleviation Scheme (FAS) has started.

Overall, it feels there has been a total disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.

In terms of sustainability, there are multiple serious issues. Firstly, a lack of adequate transport. All the roads into Feniton are very narrow, with major pinch points, they're mostly unlit and unsuitable for heavy traffic. This became very apparent recently when the Ottery Road/Green Lane junction was closed for the FAS works. Delays were inevitable and extensive and disruptive. This would get a lot worse under the new proposals.

Flooding at Patterson's Cross would also be a major issue. It will flood during heavy rain, as noted by the FAS developers. All vehicles will then need to access the village via the Old Village, or via the A373 and M5. These lanes are not suitable for heavy traffic, which will get much worse should the proposals go ahead.

Furthermore in terms of infrastructure, the current primary school in Feniton is at capacity and in need of a building upgrade, which could not happen on the current site

as it is not big enough. Local GP services are also at capacity – where would the residents in the new houses go?

The only concession to the infrastructure challenges in the proposals seems to be 1060m of new water mains pipes to be laid by 2035.

Specific comments related to flooding and sewerage in the village:

Flooding is a massive issue in Feniton and it does not seem like EDDC has considered historic flooding, including raw sewage, when putting together these proposals. Previous promises of flood risk alleviation measures from developers have not resulted in any action.

The Flood Alleviation Scheme (FAS) developers have said that it will increase the flooding risk at Patterson's Cross, which already floods in heavy rainfall. Adding more houses – and increased flooding risk from the development, without additional alleviation measures – seems ill-advised. The FAS has been designed to handle the existing flooding risk, not scoped to deal with increased risks from major developments.

Finally, it's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding. It is well documented that roads and homes often flood with raw sewage.

Specific comments on disproportionate allocation:

Devon Communities Together (DCT) identified a local need for only 13 new dwellings up to the year 2027 – this was funded by EDDC. Therefore the number of new houses in the draft plan does not make any sense and is in no way aligned to what was identified in the survey.

After the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite

the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy. How can this in any way be justified?

Overall, the proposed development is massive for a tier 4 village and can't be justified in any way based on local need.

Specific comments on employment site, known as Otry_20:

I do not understand the thinking behind this location, the site is fundamentally unsafe.

The entrance will be off Green Lane, a mostly single track road – with some parts not even wide enough for a car to pass a pedestrian without the pedestrian pressing themselves into the hedge. The road is unlit, has many pinch points, blind bends, very few pavements and two single track bridges over the railway line, one of which has a blind bend. See this video on YouTube detailing some of the massive issues here: <https://www.youtube.com/watch?v=6q7DQ6mpgh4>.

It should also be noted that Feni_08 accessed via Broad Lane has very similar issues to Green Lane.

Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. How has EDDC even had enough time to consider all the evidence effectively to make a decision? Especially in light of how big the site is and its impact on the village. The sheer size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

It also has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton. This makes absolutely no sense and is negligent considering Feniton is a Tier 4 Village.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy AR01 – C Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45 Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E. Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The plan needs to be sustainable – and that means reflecting the Tier 4 status of Feniton in these proposals. The Strategy and Vision needs to be realigned, until adequate infrastructure and mitigation has been put into place.

In terms of actions, that means:

Removal of Feni_08 from the draft local plan, and at least a reduction in the number of houses allocated for Feni_05.

Removal of Otry_20 from the draft local plan.

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: N/A

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.: N/A

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.: N/A

Full name: Desmond Maddock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid

rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Frances Mutter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I do not have the appropriate qualifications or knowledge to comment on this section.

But I do believe that previous comments, emails, and petitions from residents was not taken into considerations as it was not submitted via Common Place.

I understand that these vital public comments were not reported by EDDC to the Strategic Planning Committee, therefore ignoring the opinions of the locals in Feniton.

EDDC's preferred method of commenting is the Common Place System. It is complicated and very time consuming effectively putting people off locals trying to put their point across. This could be argued to be discriminatory and undemocratic and contravenes British Values.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It is well known that Feniton (the new and old village) floods regularly – properties and roads. I live in old Feniton where the 'road' to get out of the village floods and can be impassable, that is if we can even get out of the old village due all the surface water running like a river down to the old village. There have been occasions where we can't even get the car out of the drive due to level of the water. On these occasions, I have waded with wellington boots, up through the torrent of water coming down Broad Lane (which is unsafe to walk through as it is so deep and fast flowing and cars trying to get out the village) to try and catch the train. But the train service is unreliable and when it is so wet, the trains are cancelled. The new flood relief scheme in the new village is only

going to serve the volume of houses that are currently there now, not any more. In the old village, we are waiting for a similar relief scheme. More building will only make the situation much worse with regards to flooding and with more commuters not being able to get to work.

I have been here 10 years and in this time, I have stopped trying to walk around the lanes due to the increased volumes of traffic and size of vehicles. I note that on Plan 19, pavements will be built with cycle lanes – great idea but where are the Council going to have room as there is not even room for 2 cars to get by each other let alone a pedestrian. You take your life in your hands if you try to go for a walk. I know dog walkers who have to put their dogs in their cars and drive them out of the village to give them a walk as it is so unsafe. And the Government promotes increasing exercise in the great outdoors – not in Feniton!

How is the sewerage issue going to be addressed? The sewerage system is not fit for purpose with SWW collecting sewerage but faecal matter often seen in the road or in people's garden or home. A lovely advert to come and buy a new home in Feniton!

The public transport here is terrible. I have already alluded to an unreliable train service, even when there is not poor weather, I gave up trying to commute into Exeter as the service was so unreliable. The bus service is also not frequent or fast enough and doesn't cover and wide enough area.

Schools/medical centres/dentists all over subscribed and cannot cope.

Does Feniton really need this volume of houses when Cranbrook, which is so close to us, will be expanding from 3000 to 8000 houses and has the infrastructure already there?

Employment Site Otry_20 is not needed here.

It is in a totally unsafe location and The access is on a single track lane, blind bends, no pavements. It would be totally unsafe to build this here and the increased traffic along Ottery Road, and on Green Lane makes no sense at all. Ottery Road also floods

and can be impassable. It also seems totally out of proportion for a village setting. Please reconsider this.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I am not against increased housing but the issues I have addressed need to be rectified first. There should be a substantial reduction in the number of houses allocated for Feni_08 and the Removal of Otry_20 from the draft local plan, please. Thank you for reading this.

Full name: Sally Nowell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Regarding planning for houses and industrial estate for Feniton I am totally against it. The roads in and out of Feniton cannot take any more traffic as it is there are accidents waiting to happen. The thought of an extra 200 cars on these narrow lanes is terrifying. Delivery vans and lorries are also larger these days and with few pavements its dangerous for pedestrians and children being walked to school. Extra housing will not help the flooding problems and I understand that school and doctors surgery are full to capacity. Looking at the 2007 photograph of the triangular green in old Feniton you can see how the vehicles have ruined it by cutting corners.

Full name: Lesley Oats

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: However, it's unclear to me if the plan has been developed legally due to the following:

While I commend East Devon District Council (EDDC) for encouraging the public to 'Have Your Say', they insist the public use the Common Place system. It is complex, time consuming and deters the common man/woman from commenting.

Although a professional, I have spent many days trying to formulate my responses and, have also spent time trying to help others struggling. (I am fortunate that I have that time).

In previous consultations, emails, comments and a petition signed by over 500 Fenitonians were not reported, and therefore not considered by the Strategic Planning Committee as they were not submitted via the Common Place system. Effectively, the views of Feniton were ignored.

Common Place does not account for those that have no access to the internet or printer and therefore the on line form or paper version. This contravenes EDDC's own Equality Policy.

I believe the Common Place system is undemocratic, unfair and discriminatory. It also contravenes British Values and The Equality Act 2010.

Finally, although in a private, un-minuted meeting, I'm led to believe that Feniton Parish Council was refused to make representation on Otry_20, even though it was brought late to the table. The reason given that it is in the Parish of Ottery St Mary (OSM), although will have little bearing on OSM but has the ability to have a huge impact on the lives of Feniton residents.

References: EDDC's Equality and Objectives Policy 2021 - 2025
Fundamental British Values
Equality Act 2010

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Make it easier for Jo Public to comment.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Flooding:

Firstly I would like to comment that previous developers have promised the earth to help with the issues Feniton faces but have not delivered and often not appear to have been held to account.

It is well documented that Feniton regularly floods, not only with storm water but also sewage.

Perhaps because the draft local plan appears to have been developed rather swiftly, EDDC doesn't appear to have considered the historic flooding events in the village. What concerns many residents is that more development will mean increased flooding. At the recent planning meeting for Feni_06 which was approved, it was in my opinion, an insult to intelligence that installations of two water butts per household would help resolve flooding to any significant degree.

Kier, the company currently installing The Flood Alleviation Scheme (FAS) in Feniton has promised us that it will not cure flooding but only divert flooding away from homes and around the eastern side of the village. It is already known that it has been designed only to accommodate the current level of development in Feniton. We have been warned it will certainly increase flooding at Pattersons Cross, the main access route to and from the A30, which already gets cut off in times of heavy rain.

Despite the millions of public money having been spent on the FAS, we must remember that it is currently untested and there is no evidence of its efficiency!!

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding. It has also been witnessed that raw sewage, (and other unsavoury associated contents, used condoms, tampons etc), spews up via manhole covers flooding Ottery Road. South West Water often discharges raw sewage into a local ditch. Not appreciating the risks, children have been witnessed playing in the foul water. Homes and gardens have also been flooded with sewage, neighbours told not to use their toilets and to 'stuff a duvet down the loo to stop it overflowing. While my home has not flooded to date, during heavy rain I have heard the dreaded 'glug, glug' from my toilet which induces anxiety..... and the stench is vomit inducing!! My bathroom often smells offensive.

Sewage spillage poses a massive health risk, especially to the vulnerable of our society as is well documented in Dr William Weirs report, Consultant Physician for Infectious Diseases, of which EDDC have been made aware and have been sent.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

In 2014, at the expense of EDDC there was a Super Inquiry into the sustainability of Feniton. The Planning Inspector and EDDC agreed that Feniton was NOT a sustainable location for further development.

Apart from the FAS, there have been no other improvements in the infrastructure of the village to support the development suggested on the emerging local plan.

Vehicular access to the village is via mainly a network of lanes with pinch points, unlit, in places single track with minimal pavements. Many flood and become impassable, including Pattersons Cross, Station Road (including at the level crossing) and Colestocks Road leading to the A373, and subsequently the M5. They are all unsuitable for heavy traffic. The additional flooding and traffic, especially larger commercial vehicles will have a knock on effect for the surrounding lanes and villages.

Being unable to get in or out of the village causes residents much anxiety already and often limits our planned activities.

With the installation of the FAS, we have recently had insight into how increased heavy traffic will affect the village, especially when the Ottery Road/Green Lane junction was closed, causing traffic to use Feniton Old Village for access to and fro the village, subsequently causing extensive delays and significantly reducing road safety. This will become common place when Pattersons Cross floods more frequently due to the FAS.

For a quick walk, I would often take my dog up Green Lane but now choose to get in the car to go elsewhere, as you risk taking your life in your hands.

Increased housing will bring more families and children. However, Feniton Primary School is already at capacity which will lead to children having to be educated outside of the village, increasing the reliance on cars as a means of transport. This contradicts EDDC's vision of 'net zero carbon world'.

The school is also in great need of improvements and a significant upgrade.

Although, Feniton boasts a railway station, trains are limited in part due to the single track. Bus links are even more restricted.

Local GP services are currently struggling to serve the current population.

I note in the draft plan, the only infrastructure mentioned for Feniton is 1060m of new water mains to be laid by 2035.

In formulating this draft plan, EDDC appears to have disregarded evidence and planning history that Feniton is not a suitable location for the amount of development proposed.

The proposals for Feniton are not consistent with the local plan's stated vision and strategy; by extension with national policy.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 2 – 2.2 Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

Recently a survey completed by Devon Communities Together (DCT), identified a local need for only 13 homes up to the year 2027. This survey was funded by EDDC. This means that the allocated housing in the draft plan for Feniton is disproportionate to the DCT survey.

When this was noted by a Strategic Planning Committee member, the Chairman instructed that Strategic Policy SP01 in the Regulation 19 version be reworded to reflect the number of houses in the draft plan, ignoring the DCT survey. This has caused a mismatch between vision and strategy.

SP01 now states ‘limited’ houses. However, proposed development for Feniton is far from limited; it’s huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

Site Otry_20 is an unsafe location, totally unsuitable and will severely impact on road safety, especially for vulnerable road users.

This site is located off Green Lane which as most other lanes in Feniton is mostly single track, unlit, and with minimal pavements. Also, the entrance to the proposed site is between two over the railway line bridges, one single track with a blind bend. There are also blind bends at each end of the lane and it is so narrow in places, just wide enough for a car. Part is an ancient sunken lane where it can get blocked due to rock falls.

Please view the YouTube video which details the main issues -

<https://www.youtube.com/watch?v=6q7DQ6mpgh4>

Feni_08 is accessed via Broad Lane which has similar issues to Green Lane.

As Otry_20 was brought for consideration after the Regulation 18 consultation, it could be argued that EDDC hasn't had sufficient time to consider all the evidence regarding this site. The size of the site doesn't align with the Spatial Strategy and is disproportionate for a tier 4 village. Also, it would appear to have a disproportionately large allocation of industrial, warehousing and distribution than other employment sites in Tier 1, 2 and 3 locations.

Having been brought up in a small village, I moved to Feniton in 2017 from a large industrial town, wanting a quieter way of life and enjoy a rural village setting. Since moving to Feniton, I have seen the village constantly fighting development in order to reduce and minimize the problems it faces and to retain its community feel, character and charm. I consider the scale of development proposed for Feniton, especially Otry_20 will thoroughly undermine the village.

References: Chapter 2 The Vision – 2.6, 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Until infrastructure in Feniton is drastically improved, I believe the emerging local plan should reflect the Super Inquiry of 2014 and the DCT survey.

I do appreciate there is a need for sustainable and affordable homes and therefore to ensure a sustainable plan, better reflect the tier 4 status of Feniton and realign the Strategy and Vision, my suggestions would be:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08, bearing in mind Feni_06 has already been approved.
- Removal of Otry_20 from the draft local plan.
- No further building until the effects of the FAS are known.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Alexander Pryor

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I am not a lawyer so cannot be sure if the section is legally compliant or not, but this 'consultation' process seems designed to make it impossible for the general public to comment, and I believe that in itself is not legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The access roads and Green Lane itself are manifestly not suited to lots of industrial traffic. There are no foot paths on Green Lane meaning pedestrians have to dodge cars. I live opposite the proposed entry to the industrial site and walk my children to school down this road - it is single car-width in several places which already means cars/vans driving close to pedestrians. Also frequent instances where cars have to reverse to allow an on-coming vehicle to pass. It would be moronically stupid to deliberately bring lots of industrial traffic into this area.

The flood relief scheme currently being built will by design flood the main access road into the village (including access to the proposed industrial site) on a quite frequent basis making the site difficult to access. The alternative routes involve driving along narrow single-track roads and through Old Feniton (a small hamlet also manifestly unsuited to heavy through-traffic).

Regarding extra housing in the village, the Burlands Mead site has recently received planning permission that will already add many more homes to the village. Despite huge numbers of public comments, these plans have not provided sufficient car parking

spaces within the new development; have not addressed flooding problems; have not addressed sewage problems; have not considered outcomes of the recent Feniton housing needs survey; have not considered employment or transport links or school places or availability of health care. The village and local road network is already at capacity. Any further proposed development like the proposed Feni_08 site should not be allowed to proceed until these same issues have been looked at and resolved - widening access roads, improving transport links, improving sewage so we don't get such frequent over-spills, reducing flooding risks.

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 Ottery_20 from the proposal as this is manifestly unfit; and reduce the size of Feni-08 to a smaller area to reduce the impact on the village, and to reduce the extra flooding risk that further development will pose (to the existing village + the new development itself)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Margaret Pinnuck

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: You state there will be limited development in Tier 4 settlements. How can 4.64 Hectares of land in the village of Feniton be considered as limited. I know it comes into OSM parish but very much impacts the village of Feniton. The entrance to this plot is between 2 railway bridges with very limited visibility. How can building 127 houses be considered modest development. How can this match your Net Zero policy. The majority of these households will drive cars. For the majority of the day we have a 2 hourly rail service. You discuss needing adequate sewage provision. Until our sewage works is upgraded no more houses can be built. A cycle track following the old railway line to Ottery St Mary and Sidmouth could help with sustainable transport. This is not in your plan

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Sustainable transport provision and pressure on SWW to upgrade sewage works needs to be in place before any development is considered

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: as above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: as above

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: as above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Laura Richardson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.

- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: N/A

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We cannot substantially withstand expansion of the village at present. We have lived here for 6 years and have been shocked by the extent of the flooding and sewage issues. I have listed details below as to all issues that make this development not sound:

Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.

- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.

- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Hayley Roberts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

This long winded document and the common place system is the most un-user friendly system. By insisting that everyone uses this unfamiliar and complicated method to comment on the local plan EDDC are preventing many people from having their say. This goes for this version, as well as the last round of consultations. It is undemocratic and unfair. By using a different system to the normal planning system the public are being prevented from contributing. Therefore the planning officers will not be making informed decisions. I would also like to object that Feniton Parish Council were not allowed to speak on site Otry_20 because it was outside the parish boundary, but in this version of the plan it is included within our settlement boundary. It is not within the settlement. It is agricultural land with 1 large agricultural building.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I would like to see a final consultation, widely advertised and easy to access.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Feniton has a flooding problem. The, yet-to-be-tested flood alleviation scheme is designed to move flood water, not remove it. It is also not designed to take extra water.

Site Feni_08 is uphill of the main flood area. Major, major suds will be required to prevent flooding downhill if this area is paved over.

The flood water will be moved from the village, to Pattersons Cross. This is the main entrance to the village and is expected to become impassable at times of heavy rain. Traffic will have to go through the old village, roads that are tiny, narrow, unit, single track etc. It was a disaster when the road was closed recently, at peak times it was taking people over an hour to leave the village. The school buses were late, coaches got stuck. Lorries got stuck. Old people didn't leave their houses because they were too scared to drive. I personally saw a car reverse into a moped. Car were damaged and the roads were damaged. Increased traffic, particularly large vehicles destined for Otry_20 will cause major problems.

Access to Otry_20 on Green Lane is also unsafe, even without the flooding problems. I use Green Lane to walk my children to school every morning. The proposed site of Ottery 20, for commercial/industrial purposes will use Green Lane as its entry point. The idea of extra traffic on that road terrifies me. Every morning I stand with my children, inches from cars as they edge over a single track railway bridge, often watching them reverse past my children when they realise, because it's a blind point, that another car is trying to come the other way. What happens when 2 lorries meet each other here? There are multiple blind points on the road, single carriage way, no footpaths and no street lights and secondary school children walk the other way, to the bus stop. The junctions at either end of the road are blind and single track, lots of pedestrians use the roads. The large vehicles from the flood relief scheme have also caused serious damage to the roads by the bridges. This ground is a made-up embankment and heavy vehicles are causing it to push out to the sides and therefore the road is collapsing. An increase in large vehicles on Green Lane will be very dangerous. This is not sound. Please watch my video of the road to help you understand why. Broad Road leading to Feni_08 isn't much better. <https://www.youtube.com/watch?v=6q7DQ6mpgh4> This size of this development is hugely disproportioned to the village, and isn't required by the governments new agenda/ statistics/demands for building. Why as a tier 4 village does it need a larger area for industrial, warehousing and distribution than Exmouth (Tier 1), Axminster (Tier 2) and Ottery St Mary and Seaton (Tier 3) The village has well known sewerage issues. Until these are rectified no more houses should be added to the system. SWW will not admit these problems, but they are real and hideous. Having to wade through raw sewage to get to the train station when it spills out of the drains is unacceptable. Residents having sewage backing up into their houses, because the pipes aren't big enough is unacceptable. Adding anything else to the system without improvements is not sound. Feniton is not a sustainable place for development. The

buses are trains are few and far between. We've had to buy two cars, because we cannot both reliably get to work and manage picking children up from school. The roads into the village are small, with pinch points and frequent flooding. In 2014 a super inquiry a planning officer determined that Feniton was not a sustainable location for large development. Nothing has changed since this inquiry apart from the flood relief scheme which is only mitigating the current flooding issues (and moving it away from houses and onto the road network). It is not designed to take extra capacity.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of Otry_20 from the plan. Reduction in area of Feni_08 to reduce impact.

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: I don't know

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Daniel Rundle

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Feniton residents.

- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring members of the public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.

- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport. The buses are few and far between and the rail services have been reduced over the years and neither option is a reliable way to commute.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic. They are not safe at the moment for pedestrians, cyclist or horse riders and would become more dangerous with more larger vehicles entering the village.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.

- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.

- Proposed development in Feniton is not ‘limited’ but huge for a tier 4 village.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. The blind bends on either end of this lane are especially dangerous.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC’s Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lisa Rundle

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section. However I am concerned that a petition that was signed by 500+ residents, emails and comments have been ignored and not reported by EDDC to the strategic planning committee. Why have the views of people living local to Feniton been ignored? It appears EDDC prefer using the Common Place System as it is complex and time consuming puts people off from having their say. I think this is extremely discriminatory and undemocratic and goes against British Values.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wonder if the members of EDDC who are proposing the extra housing and industrial estate have visited Feniton and travelled along the roads to get to the proposed sites. I cannot imagine that they have because they would see Feniton is unsuitable for a higher volume of traffic, especially large industrial vehicles.

We are very grateful that the flood alleviation scheme has been supported and the work is nearly complete to stop homes from flooding. It is well documented that Feniton floods regularly. Access to my previous home in Feniton Gardens was often restricted because of flood. I was very fortunate that my home was never flooded but my neighbours were not so lucky. The roads are often impassable when we have heavy rain and although the flood alleviation will stop homes from being flooded, the water is directed to the roads so they will flood more. This means for periods of time access in and out of

Feniton will be impossible. The flood alleviation does not mean the village is safe from flooding. We were told by the scheme manager that this scheme is to prevent the current homes from flooding. Adding more homes to Feniton will take more green space where flood water can be absorbed, increasing the risk of flooding to homes. It is also well documented that sewage is a problem in Feniton. When we have heavy rain, the system is unable to cope and homes have become flooded with raw sewage. There is also the issue of lack of sustainability. At the 2014 Super Enquiry, the planning inspector determined, the EDDC agreeing, that Feniton was not a sustainable location of further development. I am unclear what has changed since that decision in 2014. The primary and secondary schools are still full. If all of these homes are built in Feniton, the local primary school does not have capacity for the children these homes will bring. This will be a cost to the council of bussing these children to another school. The roads in and out of Feniton are narrow. During the flood alleviation work the main road to Pattersons Cross was closed and it caused a great deal of congestion in and out of the village through the other routes. Our roads are not wide enough to deal with extra traffic, especially if that traffic is lorries that an industrial estate might bring. The doctor's surgeries are also full. People are unable to access an NHS dentist. There is a lack of public transport and the trains are stopping less frequently in Feniton since 2014. I feel that a disproportionate number of houses has been suggested for Feniton compared to other villages. Feniton is certainly not able to accommodate an industrial estate. The proposed industrial estate is in an unsafe location. Green Lane has no pavements but is a well walked part of the village and provides residents with access to fields for dog walking and enjoying the countryside. To put an industrial estate off this road will bring danger to pedestrians due to the lack of pavement, the pinch points, blind bends and single tracks. The industrial estate does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton. I live in Feniton because it is a safe and quiet place to raise my children. We have enjoyed access to walks around the village and through the fields. Feniton is a wonderful place to live with fantastic community spirit. I wanted to live in a village, not a town. If I wanted to have access to an industrial estate and be surrounded with houses then I would have moved elsewhere. Please stop destroying villages and taking choice away.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08. Removal of Otry_20 from the draft local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Daphne Searle

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: It's unclear if the draft local plan referring to Feniton has been developed in a legally compliant way, as there was a petition signed by 500+ residents, plus emails & comments which were NOT taken into consideration in previous consultations, as it was not submitted via Common Place. The result being that these reports weren't put to the Strategic Planning Committee by EDDC, & therefore depriving the local community of having it's - very vocal!! – voice heard. This is totally undemocratic, & makes a mockery of the whole system. This Common Place system is really difficult to navigate, & extremely time consuming, thereby deterring the average person from pursuing this way of commenting – yet another way for the opinions of the locals being diminished - again is totally undemocratic.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

This development is totally unsuitable for Feniton in many ways:-

1) Flooding – I've lived in Feniton for almost 25 years & have seen the village constantly being flooded in many areas time after time, with houses, gardens & roads repeatedly flooded – including mine ! Fortunately it didn't actually enter our house, but we had a 'moat' (with raw sewage) around our house more than once. Terrifying for all concerned. We have the final stages of the Flood Alleviation scheme being built as I write this. Hopefully it will fulfil its remit of keeping flooding from the resident's homes, however, we have been assured that this will just move the flood water down to under

the bridge at Pattesons Cross, thereby cutting off the village by its main artery – the very road which large vehicles will be using to go to & from the industrial site!!. They will then be forced to go through Feniton old village, which is a complete nightmare, as the roads are too narrow – single track in many places, all with no pavement for pedestrians & esp for school children, and we saw the havoc & chaos this caused during 6th -31st January this year when Kier construction company had to close this Ottery Rd/ Broad St for construction of the FAS. There were buses & lorries coming in opposite directions not able to pass each other, & causing a nightmare esp at commuter & school times. The village tolerated this inconvenience as we knew it was for – hopefully – a better Feniton, with fewer - hopefully, no - houses being flooded, but to have this situation as ‘normal’ is beyond intolerable. There WILL be accidents!!! Let’s pray they won’t be serious ie a pedestrian (child!?) seriously injured - or worse.

2) We had the Super Enquiry in 2014 (which I & many other Fenitonians attended) which deemed that Feniton is unsuitable for further development. Even with the, as yet untested, FAS, nothing has changed :-

a) The village will still have roads flooded. b) There is inadequate public transport. c) Schools are at capacity, as are the Doctors surgeries. d) Don’t get me started on the over flowing sewage system!!! Raw sewage being spewed onto the roads & pavements where pedestrians - esp children - get sprayed with this deadly mix daily! This raw sewage is often backed up into people’s homes!! More development guarantees more raw sewage. e) Promises made by previous developers have not materialised.

3) The number of houses planned for Feniton in the draft plan is disproportionate & doesn’t match to the DCT survey, funded by EDDC. The DCT identified a local need for just 13 dwellings up to 2027. On top of that, there are still brand new houses in Acland Rd still empty & up for sale! So why do we need any more??

There is now a mismatch between vision & strategy because when the Strategic Planning Committee realised that the number of houses allocated for Feniton were far higher than local needs, the chairman (unbelievably!) instructed the officer to rewrite the Strategic Policy SP01 in the reg 19 version, in order to justify the increased development proposed for Feniton!!! This then makes the proposed development in Feniton from ‘limited’ to huge for a tier 4 village

4) Sites Otry_20 & Feni_08 are both in unsafe locations as the roads are totally unsuitable. As previously stated, the roads are too narrow with no pavements, with 2 hump back railway bridges, one with a blind bend. The junctions at either end of this lane (Green Lane) are especially dangerous. All this highlights the dangers & unsuitability of adding more traffic to this area, plus, putting in an industrial site as well on such roads with heavy lorries will cause untold havoc, to say nothing of the further deterioration of the roads locally (we all know about the innumerable, dangerous potholes everywhere!)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

To remove Feni_08 from the draft local plan – or at least reduce the number of houses allocated for Fen_08

To remove Feni_20 totally from the draft local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martyn Smith

Other party name (if relevant): Feniton Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Feniton Parish Council's comments on the Regulation 19 Publication Draft of the East Devon Local Plan. The Parish Council has commented at all stages of the Local Plan and taken every opportunity to attend and speak at the meetings of the Strategic Planning Committee. It is dismayed that the Planning Authority has never formally acknowledged the Parish Council's legitimate concerns or responded directly to any of the issues and objections that it has raised. It is the Parish Council's view that the process of preparing the Local Plan has been flawed and that elements of the plan, particularly as they relate to Feniton, are unsound. Pre-determination On the one occasion when the Parish Council was invited to meet face to face with the Leader of the Council, the Chief Executive and the Assistant Director responsible for planning, the planning officer stated that as Feniton was not in the AONB and had a railway station it was effectively ripe for development. This set the tone for the way in which Feniton has been viewed throughout this Local Plan process and in the view of the Parish Council demonstrated a pre-determined position from the out-set. This in spite of the fact that in 2014 the District and Parish Councils were united in their opposition to unfettered development at a "Super-Inquiry" that considered the appeals of 4 refused planning consents for large scale housing in the village. The Inspector at that Inquiry agreed with the District and Parish Councils and concluded that Feniton was not a sustainable location for large scale housing. The Call for Sites and "Common Place" Early in the plan preparation there was a call for sites where landowners and developers were encouraged to identify development sites. A total of 13 sites were identified at Feniton, vastly more than at any other tier 4 "service village". While initially only one was recommended for inclusion, the majority were categorised as "Second Choice" sites that could be developed dependent on the quantum of development deemed appropriate for a service village like Feniton. The District Council determined that it was to use the "Common Place" system for public consultation on the plan. It became clear very early on that the system was not suited to a consultation at this scale. There were broken hyper-links and other glitches that led to huge frustration and dissatisfaction

with the general public and District Councillors alike. Many were simply put off commenting at all. Because of this system failure and with additional encouragement by the District Council Chief Executive, Feniton Parish Council organised a clearly worded petition setting out reasoned objections to all the sites in Feniton except the site formally recommended for inclusion. This was signed by more than 500 residents but was never reported to the Strategic Planning Committee when it considered site allocations. Neither was there detailed reporting of the careful responses that a large number of residents persisted in putting on the Common Place system or sending by e-mail. The residents of Feniton do not believe that their views have been acknowledged, let alone given due consideration in the planning and site selection process. Mis-application of policy and arbitrary changes

The Vision of the Local Plan states that “rural East Devon will retain its outstanding charm and character with modest and sensitively planned development to meet local needs”. The Spatial Strategy of the plan is logically based on a hierarchy of settlements. In order to achieve the greatest sustainability, more development is to be concentrated in the Principal, Main and Local Centres where there are existing infrastructures and employment. The Parish Council supports this approach. In the Regulation 18 version of the Local Plan, the Strategy stated that for the smaller settlements in rural East Devon, the tier 4 “Service Villages”, there would be “modest development to meet local needs” - in line with the Vision. When a member of the Strategic Planning Committee pointed out that the committee was allocating in Feniton housing numbers greater than necessary to meet local need the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version so that it now reads: “...E. allowing limited development at the Service Villages...” This was clearly a device to avoid the charge that the unsustainable proposals at Feniton are not in line with the plan’s intended strategic policy of only meeting local housing need in rural villages. However, the Vision in the Regulation 19 Draft remains “modest....development to meet local needs”. There is now a mis-match between Vision and Strategy because of the deception. As a result Feniton is burdened with housing proposals for 102 dwellings far exceeding the definition of modest development to meet local need. A Feniton housing need survey was funded by the District Council and undertaken by Devon Community Together in 2022. The identified local need then was for 13 dwellings in the following 5 years. The site Feni_08 Beechwood was recommended for housing late in the site allocation process as it became clear to the Strategic Planning Committee that it was not going to achieve the housing numbers required by national targets. Inadequate and inappropriate consideration was given by the committee to the sustainability consequences of agreeing this site. The site was already rejected by the Planning Inspector at the 2014 “Super-Inquiry” when it was the District Council arguing (at great public expense) that this was not a suitable site to achieve sustainable development. Nothing in the village has changed to make development here in the 2020s any more sustainable than it was in 2014 - in fact it can be realistically argued that the circumstances have worsened. The frequency and

reliability of public transport to the village has declined, the volume of journeys by private vehicle has increased, there has been no significant increase in employment in the village, the village school is over capacity and the nearest GP practice in Ottery is drastically over-subscribed. There is no credible evidence in the plan that sustainable development will be achieved from this allocation. Furthermore, there is imperfect understanding of both the foul and surface water drainage systems in the village. A flood alleviation scheme is currently being constructed in Feniton with the intention of capturing run-off from Cheriton Hill to the east of the village, diverting it around the village on its eastern side, taking it under the railway line and discharging it via an open watercourse to Ottery Road. This scheme is untested in practice. It is not known whether the scheme will completely solve the flooding in Feniton. Indeed it is quite possible that downstream flooding will occur on Ottery Road, the main access from the A30 to the village. This could have dramatic impact on vehicular access to the village at times of high rainfall and diversion of traffic onto entirely unsuitable country lanes. In particular, it is not clear whether the flood alleviation scheme will stop the surcharging of the foul sewer system in the village that currently occurs at times of high rainfall. At the moment this frequently results in the village foul pumping station on Ottery Road being overwhelmed. The outcome is foul sewage backing up into people's homes, discharge onto the public highway and discharge into the watercourse designed to carry storm water from the village parallel to Ottery Road. Allocating further development in Feniton that will increase surface run off and further burden the foul system, while these issues remain unresolved, is unsound planning. Late introduction of an employment site After the original Call for Sites and the Regulation 18 draft consultation, a late site was brought forward by the landowner and introduced into the local plan. Now known as Otry_20, it is a site of 4.64 hectares comprising an active orchard and a former poultry house. The site is adjacent to but outside the current built area boundary of the village. By a quirk of ancient parish boundaries it is in Ottery parish rather than Feniton. It is far distant from and has no bearing on the functioning of Ottery St Mary as a settlement but is very significant for Feniton village. The site was not consulted on in the routine Regulation 18 round and very few residents had the opportunity to comment. What comments there were, were not discussed at the Strategic Planning Committee. This site is very controversial. It is proposed in the plan as an employment site for general industrial, distribution and office/R&D uses. At 4.6 hectares it is totally disproportionate to the scale of Feniton. It represents more industrial/distribution land to be allocated in Tier 4 Feniton than in Tier 1 Exmouth (the Principal Centre) and in Tier 2 Axminster and in Tier 3 Ottery and Seaton. This is completely out of scale and not in line with the plan's stated spatial strategy of concentrating development proportionately across the settlement hierarchy. The Regulation 19 Local Plan Draft proposes redrawing the Feniton settlement boundary to newly include site Otry_20 to which the Parish Council has objected. The Parish Council contends that this change in boundary is a contrivance to ensure that employment Policy SE01 applies to the site. In

reality the site is outside the village (in fact in another Parish altogether). As such it would normally be considered as “Employment development in the countryside” to which employment Policy SE02 of the Local Plan would apply. In these circumstances the site allocation and its intended uses would fail the policy tests set out in Policy SE02. The business is not close to full occupancy nor is there a proven need from new or expanding functions. Expansion is not proportionate to the size and scale of operations nor prioritising re-use of existing buildings. Development will not be readily accessible via a range of modes of transport, nor would it be socially and environmentally acceptable. Development of this countryside site for industrial, distribution and research purposes would not be compatible with overall plan strategy and other local plan considerations. Were it to be argued that the proposal is a form of farm diversification, the Parish Council would contend that it fails the policy tests in Employment Policy SE03. The allocation does not represent an ancillary or subordinate component of an existing enterprise. Development would prejudice the existing agricultural undertaking on the site. New building, parking and other structures on a 4.6 hectare site would not be modest in scale. Quite apart from the policy failure, the site itself is totally unsuitable. It is accessed off a narrow country lane with an unconventional junction to the village “main” road. The site entry point is between two humped, narrow railway bridges and where there is no footway. It is wholly unsuitable for large commercial vehicles and largely incapable of improvement at a realistic cost. The site is beyond the natural village boundary formed by Green Lane and in open countryside. A recent planning application further east on Green Lane was refused by the District Council for the same reasons. Gaggling of the Parish Council When the site proposal Otry_20 came before the Strategic Planning Committee the Parish Council came to the meeting prepared to make its case against the proposed inclusion of the employment site. However, at the meeting the Chair of the Committee ruled that no representative of the Parish Council could address the Committee because the site was technically in Ottery St Mary Parish. This was totally undemocratic and an abuse of process. As stated above, the site has no bearing on Ottery St Mary but is very important to the functioning of Feniton and the Parish Council was prevented from raising residents’ legitimate concerns with the Committee. Flawed Sustainability Appraisal The Sustainability Appraisal includes a lengthy section on the sites that emerged from the Call for Sites. A member of the Parish Council’s Local Plan Working Group made detailed comments on the original appraisal of the Feniton sites which have never been acknowledged or reported to the Strategic Planning Committee. No changes have been made to the Sustainability Appraisal and no explanation given as to why the suggested amendments were rejected. The Parish Council remains concerned that this element of the Sustainability Appraisal is flawed and understates the sustainability impacts of development proposals in Feniton. Conclusion Because of the failings detailed above, Feniton Parish Council questions whether the plan has been developed in a legally compliant way. It is further doubtful of the soundness of the plan as far as the proposals

for Feniton village are concerned. The lack of evidence to support the allocation of 102 houses and 4.6 hectares of employment land in a small Tier 4 Service Village with poor infrastructure and a known flooding problem is very concerning. In the Council's view there has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy. The Parish Council proposes the removal of employment site Otry_20. It would support the inclusion of a more modest employment land allocation proportionate to its Tier 4 status and more appropriately located relative to existing infrastructure. The Parish Council proposes the removal of housing site Feni_08 until such time as the Flood Alleviation Scheme is completed and its efficacy tested and until the foul sewage system has been improved to eliminate excess storm water surcharge. In terms of achieving sustainable development in the village, the Parish Council doubts whether an allocation of more than half the land comprising Feni_08 would be appropriate within the plan period given the lack of evidence of need and the existing infrastructure constraints. The Parish Council supports in principle the inclusion of housing site Feni_05 but remains concerned that it too will be developed before the storm and foul water systems have been improved to cope with the current and new demands.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because throughout the Local Plan preparation the Parish Council has taken every opportunity to set out to the Strategic Planning Committee and the Council its well founded concerns about emerging proposals for Feniton village. These have been neither acknowledged nor acted upon. The Parish Council believes its only redress now is to provide its evidence to the Planning Inspector unless the Regulation 19 plan is amended before submission to prevent unsustainable and premature development in the village.

Full name: timothy steel

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: It's doubtful if we can argue too effectively that East Devon District Council (EDDC) have not been legally compliant. Therefore we suggest writing something like this:

In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

You may want to comment on the below:

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.
- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.

- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Please write how YOU feel in this box. The more personal the comments, the better.

These are suggestions to make on the soundness of the plan:

Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.

- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.

- It's well documented that roads and homes often flood with raw sewage.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.

- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.

- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

If the whole draft local plan is rejected, the whole of East Devon, including Feniton could be imposed with far greater development than has been suggested. Therefore suggestions for this section are:

To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: These are a bit like giving evidence in a court where you can be challenged by the Inspector and cross examined by a legal team acting for EDDC or developers.

Feniton Parish Council will probably do this if EDDC do not respond to our points by changing the draft local plan.

This is your choice.

Full name: Jenyth Turner-Steel

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section. However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.

EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.

- It's well documented that roads and homes often flood with raw sewage.
References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.

- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not

consistent with the local plan's stated vision and strategy and by extension with national policy.

- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45 Disproportionate allocation of houses compared to local need: Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.

- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton. Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.

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- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton. Employment site Otry_20:

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blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.

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- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.

- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a

sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

Full name: Karen Waters

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In relation to Feniton, I don't know whether the draft local plan has been developed in a legally compliant way. I don't have legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.
- Our public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of us who live in Feniton.
- EDDC's preferred method of commenting is the Common Place System. I am computer literate, I run my own accountancy practice and use softwares on a daily basis, I simply couldn't understand this online form, It is complex and extremely time consuming, effectively deters anyone from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values. I honestly believe its been made like that to discourage people from commenting. Incredibly disappointing.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Reference and copied image at beginning of response form showing Regulation 19 Proposals Inset Map for Feniton, entitled 'Map of Proposed Sites For Feniton', stating, "There are two sites of importance for Feniton- Feni_08 and Otry_20. Planning has already been granted for Feni_05, The Burlands. Feni_08 is housing and in green. Otry_20 is in red."

Flooding: Our village floods regularly after heavy rainfall, we often cannot get in or out of the village in any normal car, I feel relieved I am not on the main estate where they

need sandbags and their homes flood. Its well documents how we flood and how frequently. There are tampons, condoms and raw sewerage in the water ways behind the houses near the new Kier site, its gross but EDDC just ignores this We all know more development equals more flooding. And every developer promises flood risk alleviation schemes but they simply don't materialise. The current Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30. If more houses are built this will simply render this work that we have fought for so many years to not have the effect we need. In times of heavy rain, Pattersons Cross already becomes impassable, and this is before the diversion the the FAS will add to this. We don't even know if it will work yet! Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage: It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding. Our roads and home often flood with raw sewage.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability: At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development. Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.

Lack of adequate public transport. The trains are unreliable, infrequent and certainly don't negate the need for a car. All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic. I am a dog walker, I take my life in my hands on the roads, its got worse over the years, there are not enough passing points and many many bottlenecks. When the the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive. There were literal standstills with the volume of traffic people stuck for over 30 mins, I missed

a doctors appt and my sone had to drive a different rounte addings 10 mins to the journey just to get out of our village.

When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic. I feel grateful my children attended this school between 2004 and 2013 before I was at capacity only 1 or 2 chldren struggled to get a spot then, now we have children being bussed all over the place as there is no space, local kids within walking distance not able to attend the local school, this is ludicrous. Feniton Primary School is at capacity and in great need of a building upgrade My friend works at the school and often talks of the building issues.

Doctors! I cant get an appointment! There are no other words, where on earth will all these people see a doctor?

There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable.

The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy. The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased

development proposed for Feniton. There is now a mismatch between vision and strategy.

- Proposed development in Feniton is not ‘limited’ but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. Have you actually seen this road????? It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.

- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.

- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.

- The size of Otry_20 does not align with EDDC’s Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Kenny Wells

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I am unable to comment if the local plan has been actioned legally as I do not have enough knowledge in this area

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.

- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values. Also the completion of this form, not all residents have access to this form, this then makes it undemocratic surely and in turn not legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Flooding:

- Feniton regularly floods as do the roads in and out. During wet weather you have to consider which way is the safest drier route out of the village-more houses will mean more
- EDDC continues to ignore the flooding, the disruption it causes, including the stress and damage it creates. Some residents even have had sewage in their gardens and homes during the flooding
- If you build more houses the flooding will be worse, as the drainage is not sufficient. The Alleviation scheme is just going in and we have no idea if this will work or is simply moving the problem elsewhere
- Builders have not fulfilled previous promises and in fact at Acland Park not even finished the development.
- At times the village becomes almost cut off, with some of us struggling to get home, the diversion of the water will mean Pattesons Cross will be worse, in 2022 I rescued an elderly neighbour from this location leaving her car in the flood water.

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

Lack of Sustainability:

- There has been no changes since the 2014 Super Enquiry, when the Planning Inspector determined and EDDC agreed, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry and it is too early to see the effect this has and what other issues it causes.
- There is a lack of adequate public transport, this will mean more cars on our already busy pot holed roads

- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic. This was apparent during local closures and the carnage that ensued is well documented.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic. And in fact this area also floods, in turn Ironridge has flooded at least 6 times in two months
- Feniton Primary School is at capacity and in great need of a building upgrade, no extra space available. Summer sports already play on football club fields.
- Local GP services are at capacity and no NHS dentist.
- This scale of development in Feniton is unsustainable but EDDC seems to be ignoring this. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy totally ignoring input given during the super enquiry.

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village, soon it will be a small town!

Employment site Otry_20:

- Absolutely ridiculous proposal to put an Employment site in this location. Unsafe in many ways. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane.

- This Site is also accessed via Broad Lane which has very similar issues to Green Lane. No doubt it will attract larger vehicles which will cause chaos for people already residing in the area, to say nothing of the noise in the quiet village location.
- As this has been brought forward it could be suggested that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

- Removal of Feni_08 from the draft local plan, this land was not meant to be built on.
- Removal of Otry_20 from the draft local plan totally the wrong place to have such a development

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This all seems to be being pushed through by a backdoor,

hardly involving the locals it will effect. Totally unacceptable to only be able to object by completing this unwieldy complicated form. We have the right to object and give our opinions. The main points being Flooding Inadequate roads Poor infrastructure Broken promises by builders and EDDC Unfinished homes in Acland causing an eyesore and rat homes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sharon Wells

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

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- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.

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- EDDC continues to ignore the flooding, the disruption it causes, including the stress and damage it creates. Some residents even have had sewage in their gardens and homes during the flooding
- If you build more houses the flooding will be worse, as the drainage is not sufficient. The Alleviation scheme is just going in and we have no idea if this will work or is simply moving the problem elsewhere
- Builders have not fulfilled previous promises and infact at Acland Park not even finished the deleopment.
- At times the village becomes almost cut off, with some of us struggling to get home, the diversion of the water will mean Pattesons Cross will be worse, in 2022 I rescued an elderly neighbour from this location leaving her car in the flood water.

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage. Lack of Sustainability:
- There has been no changes since the 2014 Super Enquiry, when the Planning Inspector determined and EDDC agreed, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry and it is too early to see the effect this has and what other issues it causes.
- There is a lack of adequate public transport, this will mean more cars on our already busy pot holed roads
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic. This was apparent during local closures and the carnage that ensued is well documented.

- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic. And in fact this area also floods, in turn Ironridge has flooded at least 6 times in two months
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- Proposed development in Feniton is not 'limited' but huge for a tier 4 village, soon it will be a small town!

Employment site Otry_20:

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- This Site is also accessed via Broad Lane which has very similar issues to Green Lane. No doubt it will attract larger vehicles which will cause chaos for people already residing in the area, to say nothing of the noise in the quiet village location.

- As this has been brought forward it could be suggested that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

- Removal of Feni_08 from the draft local plan, this land was not meant to be built on.
- Removal of Otry_20 from the draft local plan totally the wrong place to have such a development

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This all seems to be being pushed through by a backdoor, hardly involving the locals it will effect. Totally unacceptable to only be able to object by completing this unwieldy complicated form. We have the right to object and give our opinions. The main points being Flooding Inadequate roads Poor infrastructure Broken promises by builders and EDDC Unfinished homes in Acland causing an eyesore and rat homes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Eric White

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

I am also very concerned that a recent event was held by Bloor homes, setting out plans for this development. This was before the area had been designated for building. This raises suggestions that this is a "Done Deal" and negates any validity of the consultation.

Exmouth has also seen a recent building boom, which has put immense strain on the sewage system. We only have to look at recent events, such as the burst pipe and almost constant raw sewage overflows on the beach and Maer. Any assurance from South West water that the system can take another large increase in housing should be backed by a period of say two years without constant pollution incidents. The storm overflow system should be only for exceptional events, not as at present when any sort of rainfall causes it to overflow.

Full name: Martyn Smith

Organisation (where relevant): Feniton Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site Feni_08 Beechwood was recommended for housing late in the site allocation process as it became clear to the Strategic Planning Committee that it was not going to achieve the housing numbers required by national targets. Inadequate and inappropriate consideration was given by the committee to the sustainability consequences of agreeing this site. The site was already rejected by the Planning Inspector at the 2014 “Super-Inquiry” when it was the District Council arguing (at great public expense) that this was not a suitable site to achieve sustainable development. Nothing in the village has changed to make development here in the 2020s any more sustainable than it was in 2014 - in fact it can be realistically argued that the circumstances have worsened. The frequency and reliability of public transport to the village has declined, the volume of journeys by private vehicle has increased, there has been no significant increase in employment in the village, the village school is over capacity and the nearest GP practice in Ottery is drastically over-subscribed. There is no credible evidence in the plan that sustainable development will be achieved from this allocation. Furthermore, there is imperfect understanding of both the foul and surface water drainage systems in the village. A flood alleviation scheme is currently being constructed in Feniton with the intention of capturing run-off from Cheriton Hill to the east of the village, diverting it around the village on its eastern side, taking it under the railway line and discharging it via an open watercourse to Ottery Road. This scheme is untested in practice. It is not known whether the scheme will completely solve the flooding in Feniton. Indeed it is quite possible that downstream flooding will occur on Ottery Road, the main access from the A30 to the village. This could have dramatic impact on vehicular access to the village at times of high rainfall and diversion of traffic onto entirely unsuitable country lanes. In particular, it is not clear whether the flood alleviation scheme will stop the surcharging of the foul sewer system in the village that

currently occurs at times of high rainfall. At the moment this frequently results in the village foul pumping station on Ottery Road being overwhelmed. The outcome is foul sewage backing up into people's homes, discharge onto the public highway and discharge into the watercourse designed to carry storm water from the village parallel to Ottery Road. Allocating further development in Feniton that will increase surface run off and further burden the foul system, while these issues remain unresolved, is unsound planning. Late introduction of an employment site After the original Call for Sites and the Regulation 18 draft consultation, a late site was brought forward by the landowner and introduced into the local plan. Now known as Otry_20, it is a site of 4.64 hectares comprising an active orchard and a former poultry house. The site is adjacent to but outside the current built area boundary of the village. By a quirk of ancient parish boundaries it is in Ottery parish rather than Feniton. It is far distant from and has no bearing on the functioning of Ottery St Mary as a settlement but is very significant for Feniton village. The site was not consulted on in the routine Regulation 18 round and very few residents had the opportunity to comment. What comments there were, were not discussed at the Strategic Planning Committee. This site is very controversial. It is proposed in the plan as an employment site for general industrial, distribution and office/R&D uses. At 4.6 hectares it is totally disproportionate to the scale of Feniton. It represents more industrial/distribution land to be allocated in Tier 4 Feniton than in Tier 1 Exmouth (the Principal Centre) and in Tier 2 Axminster and in Tier 3 Ottery and Seaton. This is completely out of scale and not in line with the plan's stated spatial strategy of concentrating development proportionately across the settlement hierarchy. The Regulation 19 Local Plan Draft proposes redrawing the Feniton settlement boundary to newly include site Otry_20 to which the Parish Council has objected. The Parish Council contends that this change in boundary is a contrivance to ensure that employment Policy SE01 applies to the site. In reality the site is outside the village (in fact in another Parish altogether). As such it would normally be considered as "Employment development in the countryside" to which employment Policy SE02 of the Local Plan would apply. In these circumstances the site allocation and its intended uses would fail the policy tests set out in Policy SE02. The business is not close to full occupancy nor is there a proven need from new or expanding functions. Expansion is not proportionate to the size and scale of operations nor prioritising re-use of existing buildings. Development will not be readily accessible via a range of modes of transport, nor would it be socially and environmentally acceptable. Development of this countryside site for industrial, distribution and research purposes would not be compatible with overall plan strategy and other local plan considerations. Were it to be argued that the proposal is a form of farm diversification, the Parish Council would contend that it fails the policy tests in Employment Policy SE03. The allocation does not represent an ancillary or subordinate component of an existing enterprise. Development would prejudice the existing agricultural undertaking on the site. New building, parking and other structures on a 4.6 hectare site would not be modest in scale. Quite apart from the policy failure,

the site itself is totally unsuitable. It is accessed off a narrow country lane with an unconventional junction to the village “main” road. The site entry point is between two humped, narrow railway bridges and where there is no footway. It is wholly unsuitable for large commercial vehicles and largely incapable of improvement at a realistic cost. The site is beyond the natural village boundary formed by Green Lane and in open countryside. A recent planning application further east on Green Lane was refused by the District Council for the same reasons. Gagging of the Parish Council When the site proposal Otry_20 came before the Strategic Planning Committee the Parish Council came to the meeting prepared to make its case against the proposed inclusion of the employment site. However, at the meeting the Chair of the Committee ruled that no representative of the Parish Council could address the Committee because the site was technically in Ottery St Mary Parish. This was totally undemocratic and an abuse of process. As stated above, the site has no bearing on Ottery St Mary but is very important to the functioning of Feniton and the Parish Council was prevented from raising residents’ legitimate concerns with the Committee. Flawed Sustainability Appraisal The Sustainability Appraisal includes a lengthy section on the sites that emerged from the Call for Sites. A member of the Parish Council’s Local Plan Working Group made detailed comments on the original appraisal of the Feniton sites which have never been acknowledged or reported to the Strategic Planning Committee. No changes have been made to the Sustainability Appraisal and no explanation given as to why the suggested amendments were rejected. The Parish Council remains concerned that this element of the Sustainability Appraisal is flawed and understates the sustainability impacts of development proposals in Feniton. Conclusion Because of the failings detailed above, Feniton Parish Council questions whether the plan has been developed in a legally compliant way. It is further doubtful of the soundness of the plan as far as the proposals for Feniton village are concerned. The lack of evidence to support the allocation of 102 houses and 4.6 hectares of employment land in a small Tier 4 Service Village with poor infrastructure and a known flooding problem is very concerning. In the Council’s view there has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan’s stated vision and strategy and by extension with national policy. The Parish Council proposes the removal of employment site Otry_20. It would support the inclusion of a more modest employment land allocation proportionate to its Tier 4 status and more appropriately located relative to existing infrastructure. The Parish Council proposes the removal of housing site Feni_08 until such time as the Flood Alleviation Scheme is completed and its efficacy tested and until the foul sewage system has been improved to eliminate excess storm water surcharge. In terms of achieving sustainable development in the village, the Parish Council doubts whether an allocation of more than half the land comprising Feni_08 would be appropriate within the plan period given the lack of evidence of need and the existing infrastructure constraints. The Parish Council supports in principle the inclusion of housing site

Feni_05 but remains concerned that it too will be developed before the storm and foul water systems have been improved to cope with the current and new demands.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Feniton Parish Council requests an opportunity to give evidence to the Local Plan Inquiry in due course.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Otry_20: The development has potential to result in harm to the rural settings of several nearby listed buildings. The site selection report fails to acknowledge the intervisibility with grade II listed Sweethams. Nevertheless, we acknowledge the statement that low level development and mitigation could address these concerns and we consider that this should be reflected in the policy, to ensure that it is consistent with both the NPPF and evidence base.

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.: Otry_20: “The development should seek to conserve the rural settings of nearby listed buildings, through careful consideration of building height, design and boundary planting.”

Full name: Craig Hatton

Organisation (where relevant): Network Rail

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Network Rail supports the principle of the Policy however there is the potential that the draft allocating site Feni_05 could be needed to relocate the train station. Whilst there are no firm plans on this at present, Network Rail raise the issue with the Council to consider this as part of the overall transport network and placemaking within Feniton.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

SD19

Full name: Nick Guildford

Organisation (where relevant): C G Fry & Son

Other party name (if relevant): Mr & Mrs Cowling

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD19

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: C G Fry & Son Ltd (CG Fry) are working in partnership with the landowners Mr & Mrs Cowling of two sites in Hawchurch (HAWK-01 and HAWK-02). Mr & Mrs Cowling have been residents of Hawchurch for over 60 years and are vested in ensuring the future vitality of the village including the key assets within it such as the primary school, village pub, village hall, church and the village shop which they have granted a 20 year lease for on their land within HAWK-01 (Norton Store). CG Fry are a regional housebuilder based in West Dorset and operating across the south west from Cornwall to Hampshire. The Company is in the ownership and control of the Managing Director, Philip Fry, and employs around 200 people across many disciplines from site operatives to professional design, surveying, planning and project management staff. Craftsmanship and quality have always been the hallmarks of CG Fry, earning the Company an enviable reputation. The emphasis is on high quality design and materials, with a finish that can only be achieved by craftsmen working in the traditional way, with the sort of attention to detail which sets our work apart. Our aim at CG Fry is to work in partnership with our landowners and key stakeholders to create developments that everyone involved with can be proud of leaving behind. While supportive of the principle of the allocation of the site for development we have significant concerns in relation to the limited extent of land identified on the Policies Map, the western boundary of which follows an arbitrary line through part of a field. These concerns comprise:

a) Ability of the land included on the Policies Map to accommodate the form of development set out in policy SD19 (retain existing employment space and accommodate 12 dwellings plus a permanent location for the village shop and associated car and cycle parking and turning areas) in a manner that would be in

keeping with the local area with respect to density and character as well as meet other local plan policy requirements; b) Ensuring a commercially viable and deliverable form of development, particularly in the context of the requirement to retain the existing employment space and provide only a limited number of new homes It is noted that point a) above was also raised by the representative of Hawkchurch Parish council that spoke at the morning session of the 1st November 2024 Strategic Planning Committee (SPC) meeting¹ (at 56 mins) noting that they were puzzled by the reduction in site area proposed by officers. As a result, as worded policy SD19 is not considered to be effective in terms of being achievable and deliverable. The area of land available for development includes an additional parcel (part of the same field) immediately to the west, as shown on the plans in Appendix A. The full extent of this area (hereon referred to as the ‘whole site’) was proposed for 38 new homes and 0.15ha of employment land in the Preferred Options Reg. 18 Consultation Draft Plan, Autumn 2022 (see extracts in Appendix B) officers concluding in their assessment of the site, as reported to the Strategic Planning Committee (SPC) in September 2022 that: ‘Hawkchurch is a suitable village for small-scale housing and employment development, particularly if this will increase its potential for self-containment given the narrow, very rural nature of the roads between it and Axminster. The village is not located in a designated landscape and the preferred site for allocation is well screened and discreet in the street scene’ (para 7.33, SPC report 9th September 2022). Village Shop

We have no objection to the reference in Policy SD19 to the site providing a permanent location for the village shop. This will allow for the permanent provision of an existing service that the landowners have already facilitated, both through making the land available for a shop and volunteering at the shop itself. It is a service that we want to see retained and which a commercially viable form of development would help support. Employment Strategic Policy SP04 identifies provision of 178.16ha of employment land within the local plan area against an identified need of 80ha. While reference is made to providing range and choice this significant over supply – some 98 ha – is totally unjustified.

In the context of Hawkchurch and site Hawk_01 it is acknowledged that there may be merit in some form of small-scale commercial / employment related uses being retained on the site, however the type and scale of provision should be in keeping with the village and should include, not be additional to the village shop.

To be effective, the wording of Policy SD19 must incorporate sufficient flexibility to enable the most suitable form and nature of employment provision to be determined

through the development management process. With respect to this matter, we have fundamental concerns to the reference in policy SD19 to ‘retain the existing employment space’.

The suitability of existing Employment Land across East Devon was assessed as part of the Council’s supporting evidence (Employment Land Review – ECN-004). However, despite the existing employment area seemingly meeting the thresholds within the Employment Land review (being over 0.1ha) the site was not even acknowledged or assessed, so no review of its suitability was undertaken. As can be seen from the photographs within Appendix C, the existing employment space is formed of large former agricultural sheds. These structures are associated with the original use of the site for storage of animal feed, where hundreds of tons of feed and fertilisers were stored with regular HGV and articulated vehicles travelling to and from the site 5 days a week. That intensification of use ceased approximately 20 years ago, the buildings now being used for the storage of caravans with no employees. With the existing lawful use being Class B8 (storage and distribution), in planning terms there is no reason why the site could not be reverted back to the original level of activity and associated type and levels of vehicular movements. While this would be possible and seemingly encouraged through the wording of policy SD19 this is not what we feel would be best for the site or the local community. This point was also raised within Hawkchurch Parish Council’s representations on the Reg 18 Local Plan (as referred to within the Draft East Devon Local Plan – Consultation feedback report – July 2023²), citing results of their community survey demonstrating most households did not support employment space on the site with concerns about noise, increased traffic, suitability of access for employment uses and that the current buildings are not fully occupied. CG Fry and the landowners do understand that local employment needs should be considered on site and we would welcome the Policy including some small scale employment provision which is relevant in scale and proportion to the nature of the site and the village as a whole. This would also respond positively to the concerns of local residents mentioned above. Given the significant need for housing it does not make sense that Policy SD19 does not maximise the delivery of new homes on the site and instead seeks to retain agricultural buildings for an employment use that is unsuitable in its location, and is not wanted by local residents. New homes for Hawkchurch

Policy SD19 is not considered to be sound in terms of reference to the provision of only 12 dwellings on the Hawk_01 site, the only housing site allocated in the village. As noted above the Regulation 18 version of the Local Plan (Autumn 2022) included provision of 38 new homes for the village on the whole site. In acknowledging that this represented a relatively large increase in proportionate terms when compared with the 240

households in the parish area of Hawkchurch, paragraph 4.7 of the officer's report to the SPC meeting of 9th September 2022 stated: 'Members will note that in some cases the 10% figure is exceeded however there is no evidence basis for applying a 10% limit so Members are cautioned against basing decisions solely on this figure. The planning merits of the site and the ability of each settlement to accommodate the levels of growth envisaged is key.' The 38 dwelling figure and inclusion of the whole site also formed officers' recommendation to the SPC in respect of proposed housing site allocations to be included in the Reg 19 LP at its meeting on 20th September 2024. Despite acknowledging that the whole site is suitable for development in all other regards the Site Selection Report, appended to the report to the subsequent SPC meeting on 1st November (page 241) simply states: 'In light of concerns that 38 dwellings is too many for this area, it is now proposed to allocate part of the site only.' There is no logic or sound justification set out within the report to the 1st November SPC meeting or the Reg 19 LP consultation documents for the extent of reduction in the quantum of new homes (from 38 to 12) proposed for Hawkchurch. Other Service Villages in EDDC, with a similar range of existing facilities include much larger housing allocations in the LP. For example, Plymtree, which has 250 households in the parish almost exactly the same as Hawkchurch (240) includes an allocation of 30 dwellings (Strategic Policy SD25). And Sidbury with 210 households in the built-up area includes a housing allocation of 43 dwellings (Strategic Policy SD26). 30 dwellings are also allocated at Chardstock, a 15% increase in existing households to a village with no bus service. There is clear inconsistency in the way that these three Service Villages have been assessed, with no evidenced justification for the approach taken in relation to Hawk_01 in the Reg 19 LP. As such policy SD19 is not justified. As highlighted within representations submitted by Hawkchurch Parish Council on the Reg 18 LP, there is support for new homes within the village amongst the local community, with a suggestion of between 20 and 25 referred to. The Parish Council's January 2023 comments state: 'Our survey has shown that 68% of households think that any development should be for 20 or less properties and this increases to 85% believe it should be 25 or less. Most supported selection of the preferred site but with the qualification about the extent and nature of the development.' By restricting the number of dwellings to only 12, Policy SD19 as currently worded would preclude a level of development that the local community has indicated it would support, completely inconsistent with the NPPF's requirement to significantly boost the supply of homes. As such, it is not consistent with national policy. In addition, the local plan should be maximising opportunities to safeguard the long-term viability of existing key facilities in villages such as Hawkchurch, including the primary school, pub and village shop through the increased patronage associated with the provision of new homes in the community. In the absence of any sound justification for the reduced number of dwellings allocated through Policy SD19 it cannot be considered to be positively prepared. For the Local Plan to be effective it is essential that Policy SD19 includes

appropriate flexibility to provide the best potential for a commercially viable scale and form of development to be brought forward that is in keeping with the local area. Such flexibility will enable the site to maximise the contribution it can make to the vitality and long-term sustainability of Hawkchurch.

Omission Site – Site Reference HAWK_02

Site HAWK_02 (location of which is shown in Appendix D) remains available for development of new homes, either in part or in full should through the progression of the local plan examination process there be a requirement to identify additional land for housing. The site offers potential to provide an extension to the existing built form at the eastern edge of the village, with excellent access to the adjacent primary school site, accessed via the existing School Close development. Part of the site may also be suitable for Biodiversity Net Gain offsetting.

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.: Changes sought to Policy SD19

For all of the reasons outlined, the following changes to the wording (text proposed to be deleted struckthrough and new text in bold) of Policy SD19 and an amendment to the Policies Map to include the full extent of the land identified at Appendix A are proposed to ensure that this part of the local plan is sound: Norton Store, Hawkchurch (Hawk_01)

The land is allocated for mixed-use redevelopment comprising around 29 dwellings, small-scale employment (eg. studio/workshop space) including a permanent location for the village shop and associated car and cycle parking and turning areas. The site should be landscaped to provide boundary screening appropriate to the location. Strategic Policy SP03 should also be updated to reflect the increase in housing numbers for Hawkchurch.

SD20

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Mr and Mrs Hansford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD20

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Introduction CarneySweeney acts for Mr and Mrs Hansford, in connection with land at Pit Orchard, Bimbom Lane, Kimington (Kilm_05) which our client has been seeking to promote for open market led housing development through the draft Local Plan. These comments are submitted to the East Devon Local Plan 2020-2042 Regulation 19 Consultation. These comments supplement those that were submitted to the Local Planning Authority in September 2024 in connection with the Regulation 18 Consultation. This previous comments are appended in full. Once again, we write to confirm that a series of inaccuracies have arisen within reporting of this site by the Council hat has led to the site not being considered for allocation for market-led residential development. The characteristics of the site, and its location, inform its development potential and its omission from the Draft Local Plan is unjustified. The Site and Surroundings The site – shown below - extends to 0.56ha and is located to the south of Kilminster. The site fronts on to Bimbom Lane from which access is taken: Topographically, the lane is lower than the surrounding landscape, with the exception of a narrow band of land already developed for housing to the north that runs east to west along a section of Silver Street and Silver Lea. The site largely consists of scrubland with the central part of the site already been cleared and an access road constructed up to base course level in connection with an existing planning consent. The site also includes narrow but steep banks in the south west, south and east with heavily planted mature trees positioned at the top of the slope. The northern boundary consists of a low bank topped with a mature hedgerow and trees. The topographical nature of the site and the presence of a band of heavily planted mature trees around the boundary, with

the exception of the point of access, means that the views out of the site are very limited. The level central part of the site falls away from Bimbom Lane meaning that the site is not visible in any views from the east. At this location, Bimbom Lane acts as a small ridge with it being the local high point for views from the east coming from other areas of Kilminster, and Axminster beyond. In addition to the topography of the site, a strong mature Devon hedgebank on the east side of Bimbom Lane prevents any views towards the site from the east, as demonstrated in Photograph 3 of this report.

Kilminster itself is a village with a population of just under 1,000, situated south of the A35. Kilminster has a good range of community facilities including a church, primary school, pub, petrol station, farm shop and cricket pavilion with bus services available to the larger settlements of Honiton and Axminster. These factors contribute to Kilminster being able to accommodate suitable levels of development. Planning History The site has a relatively extensive planning history and benefits from an extant planning consent (ref: 15/1746/OUT and 16/1586/RES) for 6 residential dwellings. The planning consent is for an affordable housing led development, therefore, there is a recognition that residential development can be accommodated at the site. Correspondence received from East Devon District Council by email dated 15th May 2018 states that “the development has begun within the requisite time period established” and consequently, it can be said with confidence that the principle of residential development of this site has been established and secured. In granting consent for the proposal for 6 residential dwellings, the Council concluded that “the benefits of the scheme are considered to outweigh any harm”. In relation to character and appearance, it was determined that the “site would be apparent from localised views... such views as would be afforded would though be localised only and although likely to have a slight negative impact this could be minimised through the use of appropriate design and materials”. Furthermore, landscape impact was considered to be “limited”.

www.carneysweeney.co.uk Subsequently, two more detailed planning applications have been submitted to EDDC for residential development (19/0077/FUL and 20/0435/FUL) with both being refused. The former was dismissed at appeal in March 2020, yet raises pertinent points regarding the development prospects of the site. Notably, in coming to their decision, the Inspector concluded that the development would “utilise a brownfield site which is encouraged by the Framework”, suggesting that weight should be added to the re-use of the site for residential development. Notable in its absence, was any discussion around landscape impact, particularly of interest as the site is within the AONB suggesting that landscape impact was not fundamental to the case for refusal. The latter application provided new commentary on landscape impact, stating that “the impact of the development on visual receptors is likely to be negligible in most views although the visual impact on residents and pedestrians from Silver Street is likely to be moderate adverse during construction and on completion reducing to low as new perimeter planting matures”. These recent applications demonstrate that development would give rise to very limited landscape harm. The fact

remains that the site has secured a consent for 6 dwellings which has been lawfully commenced through the creation of the access road and remains capable of implementation in full. Policy Context for Plan-Making Provisions for plan-making are set out within the NPPF and NPPG. Plan makers are required to take account of the following points when preparing their Local Plan. Under the transitional arrangements of the December 2024 NPPF, the new Local Plan will be considered under the provisions of the December 2023 NPPF. National Planning Policy Framework (December 2023)

- Paragraph 31 states that “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be ...focussed tightly on supporting and justifying the policies concerned and take account of relevant market signals.”
- Paragraph 35 identifies the tests of soundness as being: a) Positively prepared: As a minimum, seeking to meet the area’s objectively assessed needs and informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with sustainable development. b) Justified: An appropriate strategy based on taking account of reasonable alternatives and proportionate evidence. www.carneysweeney.co.uk c) Effective: Deliverable, based on effective joint working on cross-boundary strategic matters, evidenced in a Statement of Common Ground. d) Consistent with national policy. The Spatial Strategy We support the spatial strategy contained within Policy SP01 which identifies Kilminster as a Service Village where the Draft Plan seeks to allow limited development. This is reflective of the amenities available within Kilminster which are located in proximity to the site. However, only two allocations are proposed for the settlement set to deliver 28 new homes in total over the plan period. East Devon Strategic Planning Committee decided not to allocate the site at the meeting dated 20th September 2024. The Report, prepared by Officers in advance of the meeting, proposed not to allocate the site due to development likely having “significant landscape impact”. This assertion of significant landscape impact is not justified and ignores the Council’s own site assessment carried out in preparation of the Report. The Council contends that the site has a very high landscape value but a low to medium visibility due to mature trees at its boundary. The Council has also failed to recognise the extant planning permission on the site which not only secures the principle of residential development but also contains written commentary from the Council within the Officer Report that the landscape impact would largely be negligible with some moderate adverse impacts from Silver Street. As such, the Council failed to appropriately justify the decision to omit Kilm_05 as a draft allocation in the Local Plan. Housing Trajectory and Delivery Up to 2031/32, the Council indicate a trajectory to deliver 850 dwellings per year on average, with the remaining plan period from 2032/33 onwards to deliver an annual average of 1,070 dwellings per year. Whilst this averages out to provide for the required housing need, it means that for the first part of the plan-period, the LPA will be

under-delivering against their identified housing need and more than likely unable to demonstrate a five-year www.carneysweeney.co.uk housing land supply within the early parts of the plan-period, as evidenced by Appendix 1 of the Draft Local Plan. This approach appears to be at odds with the Framework, in particular, the requirement to “meet the area’s objectively assessed needs”. It is, effectively, a workaround, where the LPA will only be delivering 70% of the housing requirement, which would be averaged out by delivery later in the plan period, for the Plan to continue to be assessed against the previous version of the Framework and therefore requiring 80% of the housing requirement to be planned for. Elsewhere in the Draft Local Plan, notably in Strategic Policy HN02 (Affordable Housing), it is referenced that 35% affordable housing would be a target for windfall development outside settlement boundaries. This appears at odds with Policy SP06 which restricts development outside settlement boundaries, presenting concerns about the level of contribution that windfall sites will provide to meeting housing need. Paragraph 75 of the Framework is clear that there should be “compelling evidence” that windfall sites will provide a reliable source of supply. The current wording of Policy SP06 does not provide confidence that development on windfall sites will be a reliable source of supply. In combination, the restrictive nature of Policy SP06, and the reliance of larger sites to deliver the required housing need later in the plan-period cemented by Policy SP02, presents the prospect of a deteriorating housing supply position from the point of adoption within the first half of the plan period. The Framework is clear that planning policies “should identify opportunities for villages to grow and thrive, especially where this will support local services”. The restrictive nature of Policies SP02 and SP06 is at odds with the clear intention of what the Framework is aspiring to achieve. Furthermore, the Framework is clear that strategic policies should provide for objectively assessed needs “as a minimum”. Previously Developed or Brownfield Land An appeal decision for this site from March 2020 concluded that the site is a brownfield site, and factors of perceived neglect are not uncommon with many brownfield sites. Nevertheless, the NPPF acknowledges the significant role of brownfield sites to meet housing need and encourages development of these sites, with Paragraph 123 stating that: “Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”. We consider that appropriate weight has not been given to the site’s status as previously developed land in the site assessment for Kilm_05. www.carneysweeney.co.uk Environmental Considerations Ecological matters have never been cited as reasons to refuse planning permission on this site. Furthermore, both preferred allocation options in Kilminster would be caught by both Nutrient Neutrality and mandatory Biodiversity Net Gain requirements which would limit their deliverability and site yield. As Pit Orchard already benefits from an extant planning consent, development would not be subject to the same restrictions either through implementation of the current consent or a variation thereto. CONCLUSION Fundamentally, the reason given by EDDC for not allocating

Kilm_05 is inconsistent with assessments of the site undertaken by officers in determining the previous planning applications on the site. The conclusion that development of the site will create visual impact on the wider parts of the National Landscape overlooks documented evidence contained within the extensive planning history of the site. For example, the description of the site and the ability to develop the site under the extant planning consent are not considered in the EDDC site assessment. Moreover, there is no reference in the EDDC site assessment to Kilm_05 being a brownfield site. This is surprising as the NPPF clearly favours the use of brownfield land for the development of new homes which is a key component in the core theme of 'making effective use of land'. It is considered that much greater weight should be afforded to this status. In the context of the Framework and other material considerations, aspects of the Draft Plan appear inconsistent with these, and sufficient justification is not provided to demonstrate that the housing trajectory is robust, particularly when considering the approach for windfall sites. In the event that additional housing sites are required to meet the identified housing needs of the District, the site is in a prime position to accommodate a modest level of growth. Development of the site is shown to provide very limited impact on heritage assets and areas of landscape importance and is located in a sustainable location with good access to local services and facilities as confirmed by the decision of EDDC in granting permission for residential development of the site in April 2016. Finally, the site is deliverable in BNG and nutrient neutrality terms by virtue of the extant consent. These characteristics put the site head and shoulders above any other site in the village and in our opinion make it a logical and essential choice for allocation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD20

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Kilm_10: We welcome the recognition in policy SD20 that a sensitively designed scheme will be essential to avoid potential adverse impacts on the grade II listed Old Inn. However, at present the site boundary includes the car park to the public house. Loss of the car park would be unacceptable as it would compromise the sustainable future of this historic building, and would therefore be incompatible with NPPF paragraph 196. As the southern part of the site appears adequate to accommodate 5 homes, loss of the pub car park would also be unjustified. To address this issue, we request that either the car park is excluded from the boundary of the site allocation, or that specific provision is made for retention of parking. Boundary planting should also be retained/enhanced on the roadside (consistent with site Kilm_09b), and between the pub and the proposed development site to retain a visual buffer and a sense of enclosure.

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.:

Kilm_10: Remove pub car park from site boundary and amend policy to refer to boundary planting, or insert following text: “The existing car park must be retained for the use of the Old Inn public house, with built development restricted to the southern part of the site. Boundary planting should be retained/enhanced on the northern site boundary (along the A35), and to separate the car park from the southern development area.”

Full name: Lucy White

Organisation (where relevant): Lucy White Planning Limited

Other party name (if relevant): National Grid Electricity Distribution (South West) Plc (NGED)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD20

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

1. Strategic Policy SD20 - Development Allocations at Kilminster Place Land Limited welcomes the identification of land at Kilminster to deliver new residential development over the plan period, namely at Kilm_09b and Kilm_10. Kilminster is recognised as a service village under Policy SP01, capable of accommodating new development in accordance with the spatial strategy, with a minimum of 59 dwellings to be achieved within the Neighbourhood Plan area over the period 01.04.2020 – 01.04.2042. The cumulative total capacity of allocations identified under Policy SD20 achieves 42 dwellings. Land East of George Lane, Kilm_09b is allocated for 23 dwellings. The site represents the easternmost of two fields sandwiched between the northern built-up edge of Kilminster and the A35 corridor. The western field is allocated for 14 dwellings in the Kilminster Neighbourhood Plan (Made in October 2022) which covers the shorter plan period of 2020-2031. Place Land broadly supports the proposed capacity of 23 dwellings for Kilm_09b. This capacity figure is informed by a presentation by Place Land to the Council's Strategic Planning Committee in January 2022, which indicated a potential capacity of 35 – 40 dwellings for Kilm_09 a and b combined. Since this presentation, further design work has been undertaken to refine the concept layout, including preparation of a landscape appraisal, initial drainage strategy, walkover ecology survey and heritage appraisal. Copies of these studies and concept proposals for the site, prepared by Lacey Hickie Caley Limited accompany these representations. The findings of the additional surveys confirm that Kilm_09 (a and b combined) is capable of accommodating around 39 dwellings in a sensitive manner which respects the special landscape qualities of the National Landscapes and the setting of the listed buildings and mitigates any harm through the design and layout. The surveys submitted

in support of this representation are summarised below.

Landscape The allocation site lies within but on the edge of the East Devon National Landscape; its northern extent is defined by the A35. To the north west of the site lies the Blackdown Hills National Landscape, although land immediately north of the allocation site is not a protected landscape.

2 The landscape and visual appraisal identifies the main impact of the development of the allocation to be on views from the A35 on the approach to the site from the west, where the site can be appreciated as open fields with views to the Baptist Church in Kilminster. In the wider protected landscape of the National Landscapes the site is seen in the context of the rest of the village and its development would have a minimal adverse impact on the protected landscapes. The proposed layout strengthens the established hedgerow and tree planting along the northern boundary, safeguarding a 10 metre corridor for additional landscaping to mitigate the visual impact of development when viewed from the Blackdowns National Landscape and to enhance the health and wellbeing of new residents through separation from the A35 corridor. New and additional planting is proposed along the site's other boundaries to maintain and enhance the established visual enclosure of the site and soften the visual impact of new built development. An orchard is proposed to the south of the site and the existing weak field boundary planting through the centre of the site would be bolstered through additional tree planting to introduce a strong framework of landscaping. The landscaping would be sufficient to mitigate the landscape and visual impact of the proposed development on the National Landscape and assimilate the development into its context.

Heritage The heritage appraisal concludes that there is no functional relationship between the listed Old Inn and the proposed allocation. The setting of the Old Inn can best be appreciated from the roadside approaches along the A35; views of the Old Inn from the allocation site are incidental and do not add to its heritage significance. Similarly the allocation site does not form part of the 'designed' or 'intended' views of the Old Inn and is therefore not within the setting of the listed building. Accordingly, the site's development would not harm the Old Inn's setting or significance. Any views of the development are already well-screened by existing vegetation although additional landscape enhancement could be delivered as part of the development, if desirable. Any impact of development on the setting of George Farm to the west of George Lane can be mitigated by avoiding building in the junction of George Lane and the A35. The listed war memorial to the north of George Lane has a very intimate setting which would not be affected by the development of the allocation.

3 Ecology The site comprises two arable agricultural fields with trees, hedgerows and other planting along the site boundaries. The northern hedgerow alongside Gammons Hill (A35) comprise two distinct sections. The western section appears to be a species rich hedgerow that has been in place for a good many years, the eastern extent beyond the field entrance is a line of overgrown beech trees, possibly planted as a hedgerow which became overgrown. This extent is of significantly lower value than the western extent. The eastern hedgerow is also species rich and contains some significant trees.

The southern hedgerow (to the north of Meadow Bank) consists of a line of trees with an understory of shrubs. None of the trees in this area are considered significant in an arboricultural context, but several are significant in an ecological context. There are a small number of trees to the rear of properties in The Orch, including one very large oak which is of significant biodiversity value. A line of small and insignificant trees, largely ash, bisects the two field, separating it in two. These tree are of low value from an ecological context and ash die back is already prevalent in this site, which will mean their demise. There is a section of defunct dry stone wall in this area. Very little of it now remains and it serves no purpose. The boundary 'bund' of Dares Field is currently of low biodiversity value. The species rich hedgerow alongside George Lane is of a similar composition and age as that alongside the A35. Two large oak trees are located within this hedgerow. Both have been butchered by Western Power as the power lines run close to and through the trees canopy. The grassland within the two fields is arable in nature. The first survey recorded 100% rye grass, shortly after this it was replaced with maize and has subsequently been returned to rye. The ecological value is negligible.

Transport The site's location on the edge of Kilminster offers good opportunities to access an existing network of footways, cycleways and public rights of way, including a footway on the A35 connecting to a footway/cycleway routing along the B3261 into Axminster. Existing bus stops are located on the A35 within 260 metres of the site. The bus services provide a service between Exeter and Axminster with services every 2 hours Monday to Saturday. Axminster Rail Station located 2.64 kilometres from the site provide hourly train services to Exeter and London Waterloo. 4 The site benefits from a good range of facilities within an acceptable walking and cycling distance. Accordingly, the site represents a sustainable location for development with reasonable opportunities to travel by sustainable transport modes. There are two potential vehicular access options. Option 1 is an access off George Lane, via a simple priority T-junction, whilst option 2 is an access off the A35 via a priority junction with a ghost-island right turn lane arrangement. Devon County Council Highways Authority has commented on Option 1 and raises no concerns to the principle of a vehicular access off George Lane. Initial consultation with National Highways on Option 2 indicate that access onto the A35 could be achieved if a departure from standards was accepted. The proposed allocation offers the opportunity to introduce additional pedestrian and cycle connections onto the A35 and into Kilminster village to the benefit of new and existing residents.

Drainage The site comprises relatively flat agricultural land; the topography falls generally from west to east at an average gradient of 1 in 33 to a low point in the north-east corner adjacent to the A35. The whole site lies within Flood Zone 1 and is at very low risk of surface water flooding. British Geological Society mapping indicates that the site is underlain by a bedrock of mudstone with superficial deposits of silt, sand and gravel in the western part of the site and sand and gravel in the eastern part. It is therefore anticipated that the use of soakaways will be practical to dispose of surface water runoff. As a worst case scenario, an infiltration basin would be located in

the north-east corner of the site to restrict run-off to greenfield rates. The accompanying layout plan incorporates the infiltration basin. Sewer records indicate that there is a foul sewer connection from the existing residential development in Dares Field, to the south west of the site. A combined sewer should be capable of draining the western part of the site by gravity. The remainder of the site will gravitate to the north-east corner and can be connected to the existing combined sewer in the A35.

[Further detail on the site can be found in the attached PDF]

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.:

Wording of Policy SD20 The Neighbourhood Plan was prepared in general conformity with the Adopted East Devon Local Plan 2031 and there is a stated intention to monitor the relationship with the emerging Local Plan and undertake a review of the Neighbourhood Plan, if necessary, to ensure it takes precedence in decisions on developments in the parish (paragraph 1.1, Kilminster Neighbourhood Plan). 5 The National Planning Policy Guidance advises that where a neighbourhood plan has been brought into force, the LPA should take its policies and proposals into account when preparing the local plan and should not duplicate those policies in the neighbourhood plan unless changed circumstances justify this (Paragraph: 006 Reference ID: 61-006-20190723). For the following reasons Place Land considers that changes in circumstance justify the inclusion of the land allocated in the Neighbourhood Plan under Policy HD3 in this Local Plan within Policy SD20:

1. The Neighbourhood Plan expires in 2031, some 10 years prior to the Local Plan and whilst there is a stated intention from the Neighbourhood Plan group to review the Plan, it cannot be relied upon to ensure the ongoing allocation of the site for housing.

2. Kilm_09b is reliant on vehicular access via the land identified within the Neighbourhood Plan land (HD3). The Highway Authority, Devon County Council has advised that a satisfactory access arrangement can be secured via George Lane (see attached email and access drawing). A vehicular access via the A35 would also be taken from within the Neighbourhood Plan allocation. The allocation of Kilm_10 within this Local Plan also includes a stated preference for the highway access to be gained from Kilm_09b. Accordingly, the Local Plan allocations are interlinked with, and reliant upon, the delivery of a site which falls outside the Local Plan and which may not retain its status as an up-to-date allocation for the lifetime of the Local Plan.

3. The Neighbourhood Plan site is referred to as “Kilm 09a” within Policy SD20. However, Kilm_09a is not an allocated site within this Local Plan, it is not identified on the Policies Map and is not known by this reference within the Neighbourhood Plan. It would appear that the site reference has been carried over from earlier drafts of the Local Plan when the land was included in the site allocation.

4. Policy SD20 requires that a comprehensive development layout should cover both the Neighbourhood Plan allocation and the local plan site, with the whole site conforming with the design principles set out in Neighbourhood Plan policy. The effectiveness of this policy approach is questionable. Firstly, the design principles in the Neighbourhood Plan policy were drafted to apply to HD3 only. These policy principles cannot be conveyed to another allocation outside the Neighbourhood Plan. Policy SD20 does not clarify which elements of Policy HD3 represent the “design principles” which should apply across the whole site, leaving this open to interpretation at the submission of a planning application. Policy SD20 includes 6 some further design principles regarding buffer planting and footpath links. However the relationship between these principles and those within the Neighbourhood Plan are unclear.

5. The design principles within Policy HD3 refer to policies in the Adopted Local Plan, including EN19 and TT1. These policies will be superseded by the new Local Plan.

6. In respect of affordable housing and self-build, the Neighbourhood Plan policy requirements under Policy HD3 are overly prescriptive and onerous, requiring 50% affordable housing and a specific mix of house types for affordable housing and self-build. The policy requirements are inconsistent with the policies of this Local Plan and the prescriptive nature of the policy impedes delivery of housing (see attached copy of Policy HD3).

7. In light of these policy discrepancies and in the interests of establishing clear development principles for the comprehensive development of land at Kilm_09 (a and b), Place Land finds Policy SD20 to be ineffective and unsound in its current form. To achieve a sound policy, the wording should be amended to allocate Kilm_09 a and b under Policy SD20 with comprehensive design principles to apply to the whole site and affordable housing provision consistent with Kilm_09b. b) Place Land propose the following amended wording: Policy “Land east of George Lane is allocated for 37 homes. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. A comprehensive development layout should include:

- a buffer of planting to the northern site boundary (along the A35);
- safe pedestrian and cycle access with connections to adjoining roads and paths, including to southern and northern site boundaries and a west-east pedestrian/cycle link to connect to existing facilities in the village”

Policies Map For the reasons set out in respect of representations to Policy SD20, Place Land objects to the omission of land west of Kilm_09b from the policies map. In order to ensure the comprehensive delivery of development across Kilm_09a and Kilm_09b, the sites should be identified as a contiguous residential allocation on the policies map, supported by Policy SD20, as proposed for amendment by Place Land Limited.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Lucy White

Organisation (where relevant): Lucy White Planning Limited

Other party name (if relevant): National Grid Electricity Distribution (South West) Plc (NGED)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD20

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Please see attached letter.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see attached letter.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Place Land Limited has an interest in the land as promoter and would welcome the opportunity to be present at any discussions regarding the site's allocation and to explain the proposed amendments to the policy wording and the rationale for including Kilm_09a within the Local Plan allocation.

SD21

Full name: Jon Williams

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD21

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: We are fully supportive of this allocation and consider this site as fully suitable for development.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
We are fully supportive of this allocation and consider this site as fully suitable for development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: We are fully supportive of this allocation and consider this site as fully suitable for development.

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 deal with any objections presented.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD21

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Musb_01a: While we would welcome a sensitive scheme for this site, Policy SD21 needs to be adjusted to respond to the site selection report and ensure that it is consistent with the NPPF.

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.: Musb_01a:

Suggested additional wording: “A high quality scheme is required at this site which is likely to require some conversions and some new build. Development should conserve and enhance the conservation area, listed buildings and their settings, incorporating the historic farmhouse and vernacular farm buildings (which are considered non-designated heritage assets) into a sympathetically designed scheme.”

Full name: Neil Butler

Organisation (where relevant): Natural England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD21

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.: Strategic Policy SD21 Musbury (p100) Musb_01a is located in the connectivity zone for Beer Quarry and Caves Bat SAC. In line with other sites within this area the policy should also contain text which says: “In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.”

SD22

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD22

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a coordinated approach, DCC requests that an additional paragraph be added to the text relating to this policy: “A joint transport masterplan encompassing both the Newt_04 and Newt_05 allocations would be encouraged by the highway authority.”

Full name: Quinton Cumbes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD22

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details 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 paragraphs make the point that there needs to be a new footpath to link these two developments to the village and the development needs to be sensitively made due to the nature of the landscape.

1. A new footpath would be necessary as the road has no pavement beyond the roundabout where the Exmouth road (B3178) joins the A3052. It is dangerous to attempt to walk along the busy A3052 where there is no pavement, the road narrows at The Toll House, and traffic make no allowances for a pedestrian walking along the road.

2. The proposed development is a considerable way from the centre of the village. The centre of the village is not in the centre of the dwellings, it is skewed towards the eastern end of the village. The pub, church and primary school are all in the eastern edge of the village and even linking a new development to the existing footpath, it's still a long walk to these facilities.

3. It draws reference to the sensitivity of both sites. The land is steeply sloping up from the Exmouth road (B3178). It is part of the National Landscape (old A.O.N.B.) therefore two new housing developments would be out of place in such a designated area.

4. The land is steep. When we had the severe rainfall event, May 2023 when 5 1/2 inches of rain fell in 3 hours (Environment Agency figures), I have photographs of the runoff from these fields, coming down the footpath from Badger Close and onto the Exmouth Road, B3178 where it caused a deep flood across the road. The footpath looked like a muddy river in spate, emptying out onto the corner of Exmouth Road (B3178). Changing these fields from agricultural land to a housing development would greatly increase the ability for the land to create runoff onto a busy road, the B3178. Non absorbent roadways, driveways and hard standings for cars would exacerbate this situation as the land which was once absorbent agricultural land would be unable to absorb such rainfall and so increase runoff.

5. The Exmouth Road, B3178, is a very busy road. Despite the best efforts of our local Speedwatch Team, traffic continuously speed on it, whether entering or exiting the village in what is a 30m.p.h. area. A further 55 houses in this location would increase traffic on this road and also be at risk entering their access road off the B3178. In particular, traffic leaving the village goes around the corner by Littledown Lane, then accelerates away along the straight part of the road exiting the village despite it still being a 30m.p.h. speed limit, and would be accelerating away where the access road to these developments would join the Exmouth Road.

For these reasons I consider the developments as described at SD22 Newt-04 and 05 to be unsound.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Keith Symes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD22

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This development is part of a National Landscape (NL) and part of a Site of Special Scientific Interest (SSSI) and does not comply with the requirements for development within these areas.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I do not consider that this plan can be legally compliant in this area.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are a number of reasons I believe these plans for Newton Poppleford (NEWT04 & NEWT05) are not viable and are listed here.

1. In a National Landscape (NL) the conservation and enhancement of their natural beauty should be given priority over other considerations. Within these areas development should only be provided for where it would support the conservation or enhancement. National Landscape is afforded the same level of importance in terms of landscape importance as is enjoyed by National Parks. There is a duty of all relevant authorities to have the purpose of conserving these areas. These new plans are overbearing and would change the nature and outlook of the National Landscape.

2. This land is adjacent to a Site of Special Scientific Interest (SSSI) namely the Pebblebed Heath.

3. The wild life in this area requires protection. There are Deer, Bats, Badgers and I am informed Dormice. There are a large variety of bird species that include Owls and Buzzards plus many others. We are next to this plot of land and we have Newts, Frogs and Toads in our garden and they can be heard calling to others in the field (NEWT05).

4. Where is the justification for a need of this much expansion in Newton Poppleford. The proposals would increase the Village size by 5.6%, a major increase in a small Village. This proposal represents unsustainable development and is inappropriate in terms of social, economic and environmental roles that development should play in such settlements.

5. South West Water with their current infrastructure struggle to cope with the clientele they currently have, they are clearly not in a position to cope with more.

6. The small school is at capacity and not in a position to take what would almost certainly be a large increase in pupils.

7. In 2023 there was unprecedented rainfall that is becoming more common. The run-off from NEWT05 caused flooding in a number of houses in Badger Close. Building (i.e. impermeable material) on that area will only further increase the potential for surface water run-off onto Badger Close and the B3178 road.

8. On two previous occasions permission was sought to develop this land and even on appeal the permission was refused. These refusals were for very good reasons, those reasons still stand today.

9. There are minimal facilities in Newton Poppleford, No Doctor Surgery, No Pharmacy, No Access to a Dentist - NHS or Private. Just a small village shop, two takeaway restaurants and two car repair garages. Safe road crossing facilities are also inadequate as evidenced (but not acted upon) by the death of an elderly person attempting to cross the road. 10. The increased road traffic through the adjoining roads, Badger Close and potentially Beech Close, would be hazardous for current residents and generate further traffic entering the B.3178 with consequential risk of additional danger to and free flow of traffic.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The planning boundary has been shifted to encompass a site previously dismissed as inappropriate in a NL. This goes against co-operation with those who previously worked on and developed the previous plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This plan needs to take into account all of the points I have raised and obviously those raised by others in the community. Justice as they say "needs to be seen to be done".

SD23

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Please see attached representations.

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 address any queries regarding the deliverability of this policy.

Full name: Gill Barlow

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This proposition has never been offered or shown to the villagers of Otterton. The decision to allow building on this land is not compliant with a democratic society. The Parish Council have not shared any of their decisions with the village. The Parish council should make it a priority to include the members of the village to have a voice in the future of the village especially in such a sensitive area.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The village of Otterton had a Village Plan in place which protected the Orchard from development. It was the wish of the village that land off Bell street was the most desirable land for development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There can only be co-operation if all parties are aware of the implications. Did EDDC know that Otterton PC had not informed the residents of any of their actions?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Elizabeth Mew

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land north of Behind Hayes (Otto_01) The site is allocated for 10 homes. There are significant heritage and landscape constraints at this site and the northwestern part of the site is not appropriate for built development. This land should be kept open and made available as a community open space/orchard or similar use. Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets. Vehicular access needs to be to the east/Orchard Drive.

The site is an ancient orchard that needs to be protected and managed for its cultural, heritage and potential biodiversity significance and is already deemed as inappropriate for built development on the northwestern side. However, it is not clear enough in the local plan (above paragraph and map) as to the exact area the 'northwest side' refers to. The surveyors have been surveying the whole of the paddock in recent days, including the south and the west which is of concern.

It is important that the village retains its rural character by preserving green spaces in between housing and other buildings to maintain the landscape and rural heritage rather than using these areas for infill which would permanently impact the important wildlife that may exist as well as the landscape view of the conservation area. The

orchard could be used for outdoor educational purposes, especially due to its proximity to the school especially as the latter has very limited outdoor space.

There are more suitable sites for development, for example brownfield sites on the outskirts of the village that would have far less negative environmental impact.

While there are constraints mentioned in the local plan regarding the landscape importance of the orchard, there is a lack of reference to protection / enhancement of biodiversity or to the alternative educational and community uses that it could provide.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

- The wording in the local plan needs to be more precise on the exact area of the orchard that is proposed for the housing development, and which will be preserved as a community orchard (or similar).
- The wording needs to include reference to biodiversity/ wildlife importance and protection, including protection of trees
- The wording should make reference to alternative uses of the area to housing, such as livestock grazing and educational opportunities

Below, I have made suggestions for rewording the local plan paragraph.

The site is allocated for 10 homes. There are significant heritage and landscape constraints at this site and the north western and south western part of the site is not appropriate for built development. This latter section of the land in question should be kept/ preserved as a historic orchard and made available as a community open space/orchard or similar use, managed for the benefit of people and wildlife.

Development should be very carefully designed to ensure that it is compatible with the National (or should this be Natural?) Landscape and adequately mitigates any impact

on the surrounding heritage assets and the natural environment as well as considering the educational value of the green space. Vehicular access needs to be to the east/Orchard Drive.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Michael Parkin

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Representation to the Regulation 19 consultation on the East Devon Local Plan 2020-2042,

This representation concerns: The strategic Policy SD23 Development allocation at Otterton Land north of Behind Hayes (OTTO-01)

Relevant parts of the local plan:

Our Outstanding Historic environment

Land north of Behind Hayes (Otto-01)The site is allocated for 10 homes. There are significant heritage and landscape constraints at this site and the northwestern part of the site is not appropriate for built development. The land should be kept open and made available as a community open space/orchard or similar use. Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets. Vehicle access needs to be to the east/Orchard Drive.

Policy HEO3: Conservation Areas

B. Requirement: take in to account important views within, into or out the Conservation area and show that these would be retained and unharmed;

E. Be sympathetic to important spaces such as paddocks which make a positive contribution to the pattern of development in the Conservation area.

My submission to EDDC

I welcome all of the above restrictions but feel that they do not sufficiently protect the important and only view of the conservation area looking from the south towards the north. Please note : the developer is already surveying the whole of this paddock, including the south and west, and the whole of the second smaller paddock to the east.

The field gate, in Behind Hayes, alongside the property EDZEL, provides the only public view of the conservation area, from the south. From the field gate there is a perfect landscape view across the paddock, to the village, the conservation area and, to the right, the plantation of sycamore trees with Anchoring Hill and the landscape beyond.

Although not open to the public, this paddock is a huge amenity for the village. Families bring their children to watch the sheep and lambs grazing in the orchard, just as they have done for centuries before. Visitors to the village and walking groups all stop at the gate to take in this beautiful view. The paddock also has a few remaining ancient cider-apple trees which still produce a large crop every year. It is also worth mentioning that the field gate is the historic entrance once led to a “roadway” which ran all the way down to the main road. This is shown on the Tythe Map from 1844.

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.: My request to the Local Plan Team

In order to protect this heritage view and taking account of Policy HEO3 part B and E, the only alteration I would ask to be made is to add a few words which are shown in red below.

Land north of Behind Hayes (Otto-01) The site is allocated for 10 homes. There are significant heritage and landscape constraints at this site and the northwestern part of the site, and the southwestern part of the site, including the historic view over the conservation area, from the field gate in Behind Hayes, is not appropriate for built development. The land should be kept open and made available as a community open space/orchard or similar use. Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets. Vehicle access needs to be to the east/Orchard Drive.

Full name: Roger PELLOW

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This particular site would be difficult to develop and has many obstacles to building housing on it which would need to be sorted out. The site is in an elevated position within the village and will have a large visual impact on surrounding listed buildings and also the villages Heritage area. Also the site is very undulating with large contour changes. Due to the elevation of the site and the drop to current housing the risk of flooding is significant to established housing. From my property alone the drop from the site varies between 7 -14 meters. The other factors that need to be considered are the impact of light and noise pollution which at present there are neither. There are Bats in the surrounding trees that also need to be considered. Due to the exposed site any development need to be low profile such as Bungalows. Some properties sit at an elevated position in relation to the site and their foundations and gardens would need to be reinforced to avoid erosion.

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.: All the properties below the the proposed development need to have protection against flooding. An area such as an Orchard with trees would help elevate flooding, incidentally the field was in the past an orchard. Any housing need to be low profile. Finally the Heritage properties and preservation area must not be impacted.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Not suitable due to impact on Heritage area listed buildings ! As elevated site. Severe danger and risk of properties below site of flooding ! Noise and light pollution will affect HUMANS AND BATS

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.: Look for another more suitable site in village

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Roger PELLOW

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This site is boarded by several properties that are listed and are in the a heritage preservation area.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site is in a very elevated position in relation to Heritage buildings and and development must be low rise and shielded from the properties

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: J Jeremy Wakeling

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Draft Emerging Local Plan 2020-2040 states as follows in relation to what I shall refer to as the Orchard Site. Land north of Behind Hayes (Otto_01) I support the over-riding policy objective to provide additional housing in line with national policy and agree that further housing should be built in Otterton. The issue is where this would best take place.

The 2023 Consultation In 2023, a consultation took place seeking feedback as to which of five sites would best be targeted for redevelopment. These were identified as Otto_01, 02, 03a, 03b and 04. The product of the consultation was outlined in a response made by the Parish Council in a report to EDDC dated 15 January 2023. In that report the Orchard Site was ranked 4th in terms of preference for redevelopment. (Ranked 1-5 the most preferred has the lowest number.) Ranking 1. Otto_04 85 2. Otto_02 87 3. Otto_03a 98 4. Otto_01 113 5 Otto_03b 133 The preferred sites were those at the northern end of the village. Otto_04 This is the derelict site on Ottery Street adjacent to the most recent Rydon Orchard development that has generally met with approval in the village. Otto_02 This is the site adjacent to the North Star engineering works and largely level. By some margin, Otto_1, was not seen as a suitable or preferred target for development.

The location of Rydon Orchard, Otto-04, the North Star Engineering Works and Otto_02 are shown below. Quite why these sites were not selected is unclear when they are within the Settlement Boundary, adjacent to essential services and located where any scheme would have no adverse affect upon the landscape nor impact upon heritage assets located in the village.

Otto_1 – The Orchard Site

The votes against the Orchard Site would have represented local appreciation of the issues that arise from any attempt to develop the site. Some of these impact directly upon the costs of such a scheme and ultimately, its viability. If a scheme is not viable, it will not be built, and the objectives of the underlying policy will fail. The particular issues that detract from the decision to allocate the Orchard Site and will impact upon viability are these:

Contours of the Site The site slopes steeply from south to north and particularly towards the northwestern boundaries. Parts of the site are known to be unstable and have shown a propensity to slip after wet weather.

Run-off Any scheme will substantially increase the surface water run-off and there is the prospect of flooding affecting those properties lying to the north of the site.

Surface and Foul Water Drainage The concerns over flooding are exacerbated by the knowledge that the current surface and foul water drainage systems in the village are already overloaded. This is especially in the summer months when additional pressure is placed on the system by the Ladram Bay Holiday and Caravan Park. Before any further development takes place in the village, this issue requires resolution. Such additional cost might fall on the developer.

Access The draft plan envisages access to the site via Orchard Drive, correctly acknowledging the inherent unsuitability of attempting access from Behind Hayes that is narrow and single carriageway. But even the roadway from Orchard Close is likely to require upgrading thereby adding to the costs of the scheme.

The draft plan as quoted above [para.1.2] acknowledges that the site is unsuitable for development on a number of grounds:

The ‘Significant heritage and landscape constraints’ The Orchard Site directly abuts the former Houstern Farm of which Houstern Farmhouse formed part. This is one of the oldest houses in Otterton dating from 1550. Any scheme will overshadow and degrade the property as a heritage asset.

A key element of Otterton's heritage is that a number of farms were sited on Fore Street with their land rising up the slopes behind them. In the case of Houstern Farmhouse, this included the ancient orchard, the remnants of which are still apparent in the old apple trees on the site. Part of the essential character of the village is its lineal nature with the original houses fronting Fore Street and their gardens, farms and open space behind.

The preservation of the Orchard site as open space is essential to preserve the historical nature of the village and whilst the Draft Plan states that any 'Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets', it is difficult if not impossible to see how this can actually be achieved.

Conclusions

Looking at a plan of the village, one only sees it in two dimensions and the attraction of infill within the settlement boundary might look neat and logical, but that is not the case.

The Draft Plan makes plain a number of impediments to any development of the site and goes so far as to declare that the northwestern part of the site is not appropriate for built development. The Draft Plan, by implication, divides Otto_1 into two parts that might be described as the Orchard Site to the west and the Paddock site to the east. This said, I would submit that the same issues apply to the entirety of the site Otto_1.

On top of the issues raised in the Development Plan, are those I listed above which would significantly add to the costs of the scheme and in my view, are likely to render it unviable, especially when there is likely to be an additional need to accommodate Social and Affordable Housing.

If the objective is to see the provision of new housing in the village, the most obvious route is to identify and facilitate the development of sites that are suitable and more readily built out. In 2023, Otterton residents recognised which of the options identified should be preferred, and they are right. If local consultation is to mean anything, the

sites to be allocated should be those to the north of the village, not least because the Orchard/Paddock site is so plainly unsuitable for development and the economics stand every prospect of rendering such development unviable.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Otto_01: While the policy for Otto_01 helpfully identifies, and goes some way to addressing, the heritage issues at this site, we consider that it would be helpful if there were greater clarity around some of the key parameters that developers will need to consider.

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.: Otto_01: Suggested adjustment to policy text: "... Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets through its layout, design, landscaping and limits on building heights. This should include identification of any key views to be conserved and enhanced. Vehicular access needs to be to the east/Orchard Drive.

SD24

Full name: Dan Yeates

Organisation (where relevant): Savills

Other party name (if relevant): Summerfield Homes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD24

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

We support Strategic Policy SD24 and specifically the proposed allocation at Payhembury, the Land adjacent to Markers Park (Payh_03a). However an amendment to the allocation boundary is proposed. See attached...

The proposed allocation states:

Land adjacent to Markers Park (Payh_03a)

This site is allocated for 15 homes.

Design and layout of proposals should be appropriate to this village gateway location and sensitively and appropriately take account of the topography of the site and the heritage and any ecological significance of the marl pit (a non-designated heritage asset) which must be retained in the end proposals. Access should be designed to retain existing mature trees and minimise hedgerow removal, whilst ensuring highway safety. No house shall be occupied until a footpath connection is provided with existing

pedestrian routes to the centre of the village. Landscaping which responds appropriately to the introduction of built form in this location shall be provided, including the introduction of substantial boundary screening along the southern boundary to maintain the rural character of the lane and the significance of the setting of the Grade II listed Glebe Farm on the southern approach.

Payhembury is a sustainable location for future development, for the scale of development proposed.

The village hosts the following which provide day-to-day services and facilities:

- Shop / convenience store
- Primary school
- Pub
- Village hall
- Sports playing pitch
- Children's play area

As a result, Payhembury is an entirely appropriate location for future growth, and we support the Council's commitment to direct a proportion of the required growth to the village.

We specifically support the proposed allocation of Land adjacent to Markers Park (Payh_03a) for the development of 15 residential dwellings.

The development of the site can provide much needed market and affordable housing to help meet local housing needs, as well as helping to sustain the vitality and viability of the existing services and facilities in the village.

In terms of the proposed allocation requirements, we agree that the development of the site should also provide footpath connections to the village. Such improvements can be reviewed further as part of an emerging masterplan for the site.

Notwithstanding our support for the allocation of the site, we do have some concerns over the proposed allocation boundary which we consider could be more sensitively located.

Instead, we have prepared and appended to these representations an indicative layout plan (Appendix 1) which would enable the delivery of the 15 dwellings proposed whilst providing a suitable access and associated open space.

As a result of this work undertaken for the site, we request that the allocation boundary for Payh_03a be amended to align with the extent of the Indicative Layout Plan attached at Appendix 1. Having said this, we have prepared a layout within the suggested allocation boundary, which we also attach (Appendix 2). We consider that providing housing fronting onto the road provides a lesser visual and landscape impact as housing is avoided on the higher ground. These layouts retain the TPO trees and offer the opportunity to provide strategic landscaping at this entrance to the village on land within the same ownership. The alternative layout and allocation boundary also provides a buffer towards the marl pit. Foul and surface water drainage connections are nearby and some soakaways are likely to form part of the overall drainage strategy, with some of the land being freely draining with the rest having slightly impeded drainage. Technical work dealing with ecological, heritage, drainage, vehicular/pedestrian/cycle access and other technical impacts will be dealt with as part of the application. Initial work undertaken on these technical matters, both by Summerfield Homes and East Devon District Council, indicate that none of these matters represent an insurmountable bar to delivery of the policy aspirations.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is important that Summerfield Homes Ltd is present to participate in the hearing session for Policy SD24 owing to their interest in the Land

adjacent to Markers Park, Payhembury (Payh_03a). It is important that they are given the opportunity to make their case in relation to this policy.

SD25

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr J Persey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD25

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

On behalf of MR J PERSEY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Mr Persey and his family are long standing owners of large areas of agricultural land in East Devon. Our client's interests include much of the land around the village of Plymtree and the surrounding area. The family continue to farm the land today, and also have commercial operations including Fordmore Farm Shop and other commercial space on the East Devon / Mid Devon border. Our client therefore has a wide range of land and building interests in the district and they are actively promoting a site for housing in the village of Plymtree (Plym_03). Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 5. DEVELOPMENT IN THE TOWNS AND VILLAGES Strategic Policy SD25: Development Allocation at Plymtree Mr Persey supports the development allocation for Plymtree listed in Strategic Policy SD25 and identified on the Policies Map, as "Land north of School - site reference Plym_03)". Mr Persey is the owner of the site, and the land is immediately available for development. The applicant is committed to seeing their site and respective allocation delivered. The inclusion of Plym_03 for residential development is clearly supported as its represents a logical approach to development and growth to the village of Plymtree. It is centrally located to services and facilities and is most appropriately located to assimilate with the built form of the village. The specific policy allocating Plym_03 states; "Land is allocated for 30 new homes and a community facility. This site is particularly sensitive in heritage terms and

detailed assessment will be needed to ensure that an acceptable design solution is reached that respects the special character of the area and the setting of the heritage assets around the site. Footpath links to local facilities will be required as part of the development. The development will need to maximise opportunities for localised improvements/ contributions to enhance sustainable travel modes..” MR J PERSEY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 On these technical points we would ask it to be noted that:

- Outline planning application 23/1247/MOUT for 30 dwellings is currently being considered by officers and has support. At the time of submitting these representations the scheme is heading to planning committee with an officer recommendation for approval.
- The scheme confirms that 30 dwellings can be accommodated without detriment to ecology and heritage issues and is technically sound in all respects.
- Footpath connections will be provided to link the site to various parts of the village and safe and suitable access exists for the site. As such, the allocation of the site for residential development is sound and supported by appropriate officer assessment in the submitted evidence base.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD25

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Plym_03: There are a number of designated heritage assets in close proximity to this site allocation including the grade I listed Church of St John the Baptist – a heritage asset of the highest significance according to the NPPF. Development of Plym_03 could result in considerable harm to this asset by urbanising its setting, eroding the relationship with its wider rural landscape to the northeast, and through impacts on views of or from the church and its grounds. We are aware of a current planning application for 30 dwellings on this site. We have outstanding concerns about this proposal and therefore, while we acknowledge that it may be possible to accommodate some new housing in this location, we suggest that the site capacity is further reduced to mitigate impacts. We request that policy SD25 is amended to better reflect these issues and to improve consistency with both the NPPF and evidence base.

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.: Plym_03: We suggest that the site capacity is reduced, or amended to state “up to 30 new homes” along with the following additional policy text: “This site is particularly sensitive in heritage terms and detailed assessment will be needed to ensure that an acceptable design solution is reached that respects the special character of the area and the setting of the heritage assets around the site. Careful consideration will need to be given to layout, building heights, design and landscaping. Development should conserve views of and from the grade I listed church and retain an open green space linking the church and its wider rural setting.”

SD26

Full name: Dan Yeates

Organisation (where relevant): Savills

Other party name (if relevant): Sidbury LVA LLP

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD26

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

We fully support Strategic Policy SD26 and specifically the proposed allocation of the Land South of Furzehill, Sidbury (SIDM_34).

The proposed allocation states:

Land South of Furzehill, Sidbury (SIDM_34)

This site, to the south of Sidbury, is allocated for 43 new homes. Development of this site will enable the second phase of the Devon County Council proposed multi-use trail (routes used by a combination of cyclists, pedestrians and by/for other movement), ensuring delivery of the entirety of the route from Sidford to Sidbury. Vehicle access to the site will be via A375. Development would be expected to play its role in delivering part of the Sidbury to Sidmouth cycle route through the allocation.

In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

The site is within the East Devon National Landscape and particular care will be needed to avoid adverse impacts, especially on higher westerly site parts where open space provision may be appropriate. Listed buildings are found to the north and east of the site and the Sidbury Conservation Area also lies to the north; proposals will need to be carefully designed to avoid detrimental impacts on these heritage assets. A comprehensive overview of the land south of Furzehill, Sidbury was provided as part of representations to the previous stages of the Local Plan, including the Preferred Options Consultation in January 2023, and further Regulation 18 consultation in May 2024. Therefore, as part of these representations we have not sought to repeat the previous information and have instead set out the updated position, not least given an outline planning application has now been submitted for the site (ref: 24/2434/MOUT).

OUTLINE PLANNING APPLICATION AND PUBLIC CONSULTATION

Since the previous representations were submitted in June 2024, further public consultation has been undertaken in relation to the emerging proposals, including a consultation website with draft plans and a series of questions to obtain comments from the public and stakeholders. The consultation website ran from the end June 2024 to early October 2024.

As part of this, local ward members and Sidmouth Town Council were notified and comments sought.

The consultation material available for the public and stakeholders to view comprised background information on the site, an overview of the policy context and local affordable housing need, constraints and opportunities analysis and a draft masterplan. The draft masterplan explained the options available for the connections between the first and second phases of the County Council cycle link and the ability of the site to accommodate the second phase to ensure the link is delivered in its entirety.

This consultation was followed by a presentation of the proposals to Sidmouth Town Council on 9 October 2024. This comprised a presentation to town councillors, followed by a question and answer ‘round table’. The presentation was given as part of one of the town council’s formal planning meetings and was therefore open to members of the public to attend. A few local residents attended the meeting and asked questions.

Questions during the presentation covered several matters including highways / access, flood risk and drainage, pedestrian linkages, landscape impacts, ecology and heritage.

The outline planning application was then submitted in November 2025 (ref: 24/2434/MOUT) and is currently pending determination with East Devon District Council.

The submission of the outline planning application demonstrates the intent of the applicant, Sidbury LVA LLP, to deliver the site in the context of the significant need for housing in the district, as well as delivering the second phase of the multi-use path.

Indeed, the masterplan for the site submitted with the planning application (Appendix 2) provides for up to 43 new homes as per the emerging allocation SIDM_34.

The submitted application comprises the following:

- the delivery of 43 new homes, comprising 28 market homes and 15 affordable homes to for the local community to address the current housing shortfall;
- the delivery of a high quality and sustainable off-road multi-use path linking Hillside and Furzehill - extending the proposed Devon County Council multi-use path, for which the first phase is subject to a live planning application;

- integration of the development with the existing urban form and surrounding landscape (specifically ensuring that the upper slopes are kept free of development in accordance with the requirements of emerging policy SIDM_34);

- the delivery of a high-quality residential environment;

- delivery of considerable open space provision, over and above adopted policy requirements;

- net biodiversity gain through the retention and enhancement of existing habitats, and creation of new habitats alongside delivery of a range of ecological mitigation and enhancement measures. Indeed, as demonstrated by the supporting plans the application proposals can provide more than the Government's 10% requirement in Biodiversity Net Gain across habitats, hedgerows and watercourses; and

- a sustainable drainage strategy which will restrict site runoff to the greenfield equivalent rate and provide long-term storage.

The submitted masterplan includes a significant amount of integrated multifunctional green space that is easily accessible for the use and enjoyment of the whole community and makes connections with the wider landscape - including a new pocket park, a community orchard and new hedgerows, wetland and meadow areas to enhance biodiversity.

The development of the site would comprise a natural extension to the existing houses at Furzehill and Hillside, sitting in the lower part of the valley with minimal landscape and visual impact on the wider area, sensitive to the AONB setting. Indeed, the site is physically surrounded by built development to the north, south and east, and is

therefore capable of seamless integration with the village and being developed with relatively limited visual impact.

Overall, it is clear from the submitted planning application plans and documents that the pending outline planning application demonstrates intent by Sidbury LVA LLP to bring forward this site now to facilitate new homes and the delivery of the second phase of the multi-use path. It also demonstrates that the pending outline application is entirely consistent with the requirements of the emerging allocation particularly through the number of new homes proposed, the provision of the second phase of the multi-use path and the protection of the upper slopes from built development.

JOINT WORKING WITH DEVON COUNTY COUNCIL AND KEY PUBLIC BENEFITS

The first phase of the cycle route, which is being progressed by Devon County Council, will run between Sidford and Hillside, which forms the lower part of Sidbury. However, there is a need for a second phase of the cycle route, to connect Hillside to main part of Sidbury and for this to be delivered in a timely manner.

Devon County Council have submitted the planning application for the first phase (ref: DCC/4404/2024) and this is currently pending determination.

Sidbury LVA LLP have been working with Devon County Council for some time to discuss options for the delivery of Phase 2 of the route, and specifically how the land south of Furzehill can provide this.

This joint working involved engagement in the development of the Phase 1 route including attendance at an online consultation event held by the County Council in December 2023 which involved discussion around the need to provide a second phase to the route. Indeed, there were concerns expressed by local residents as part of that event that residents of Hillside do not currently have a safe route to the centre of Sidbury, and therefore that a second phase of the link is crucial. This was also apparent from representations by local residents, with the published consultation report from WSP on behalf of the County Council confirming that one of the key concerns expressed by local residents was a “lack of connectivity to the wider Sidbury village”.

This is clear given Chapel Street, heading north from Hillside does not have a footpath, and is very narrow, and therefore local residents already experience problems connecting from the southern end of Sidbury towards the village centre. The provision of phase 2 of the County Council's proposed link, through the site, would therefore allow both new and existing residents to find safe access to the village centre, rather than negotiate a section of Chapel Street which does not benefit from a footpath.

The principle of the delivery of the Phase 2 link has therefore been discussed with Devon County Council who are supportive of the delivery of the entirety of the link between Sidford and Sidbury.

In our view local residents should not be left with the delivery of a Phase 1 link which terminates at Hillside meaning residents, if wanting to walk or cycle from Hillside to the village centre to the north, would need to negotiate a stretch of Chapel Street which lacks pavement and is not safe.

The alternative would be to wait for a second phase to be delivered in the future, but that would be entirely dependent upon the availability of government funding. Therefore, such an alternative at best could be several years away, and at worst may not proceed due to a lack of funding.

Therefore, the potential for the site to deliver the second phase of this important link as a safe 'off road' link through the site would ensure the whole link between Sidford and Sidbury is delivered, and not just Sidford to Hillside. It would also, importantly, ensure that the second phase is delivered now.

This would be a significant public benefit as part of the development of the land south of Furzehill, particularly as the site is the only site capable of facilitating the phase 2 link, and therefore a very good reason why the site should be allocated in the draft Local Plan.

Overall, the Land south of Furzehill, Sidbury remains a very good candidate for allocation in the emerging Local Plan Review. As the masterplan for the site and supporting technical work demonstrates, the site is capable of accommodating the 43 new homes proposed in draft Policy SIDM_34, including a policy compliant level of

affordable housing, as well the delivery of the second phase of the Sidford to Sidbury cycle link. Given the lack of local affordable housing delivery and lack of any other feasible options at Sidbury, the Land south of Furzehill is an ideal candidate for allocation in the plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is important that Sidbury LVA LLP is present to participate in the hearing session for Policy SD26 owing to their interest in Land South of Furzehill (Sidm_34). It is important that they are given the opportunity to make their case in relation to this policy.

Full name: Suzanne Lienert and Adriana Chittleborough

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD26

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Legal Compliance The proposal is not legally compliant with the designation of National Landscapes. Under Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023, public bodies must ‘seek to further’ the purposes of protected landscapes. The East Devon AONB, in which this site is entirely located, is afforded the highest level of protection under Strategic Policy OL02. Development within a National Landscape is only permitted where it avoids harm and contributes positively to the special qualities of the area.

There has been no evidence that this site meets these criteria. Instead, the developer’s own assessments acknowledge the harm it will cause. Furthermore, in the Planning Committee discussions, there was no consideration of how this development would meet the legal requirement to enhance the AONB. Proposals to limit the development’s footprint were later reversed in favour of expanding it, without proper scrutiny or compliance with the Levelling Up and Regeneration Act.

Additionally, Policy OL02 states that major development in a National Landscape will only be permitted in exceptional circumstances and when it is demonstrably in the public interest. There has been no explanation of what the exceptional circumstances are or how this development serves the public interest. This failure to consider the legal requirements further undermines the validity of the site’s inclusion in the emerging Local Plan.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We are writing to formally object to the inclusion of land around Furzehill Farm in the emerging Local Plan. While our property is not directly opposite the site, we are significantly affected by both the increased risk of flooding and the dangers posed by additional traffic on the already hazardous A375. Soundness of the decision For a decision to be sound, it must be based on solid evidence and represent the most appropriate option. The Planning Committee's discussions on this site were superficial and lacked the necessary data to support an informed decision.

1. Flooding risks – The site is located on steep agricultural land with non-porous clay soil, contributing to surface water runoff. Localised flooding is already a serious issue, affecting our property and others nearby. It has since been confirmed that the site cannot use road drains to manage runoff, raising serious concerns about the viability of any drainage solutions. There is significant flooding without the extra housing. Unless the the infrastructure can be upgraded meet expectations to not worsen the situation, the current proposal is not viable.

2. Road safety and infrastructure – The A375 is narrow, with blind corners and no footpaths, making it dangerous for pedestrians, cyclists and existing traffic. No expert assessment of the proposed access has been conducted, despite the clear risks. The Town Council and local residents have repeatedly raised concerns that additional traffic from 43 homes would make the road even more hazardous.

3. Lack of proper process – Initially, only part of this site (Sidm-34a) was being considered to preserve a break between developments. However, following lobbying by the developer, the full site (Sidm-34a and 34b) was included in the plan without transparent discussion or debate. This undermines the credibility of the decision-making process.

4. Failure to compare to alternative sites – The committee did not rank or compare sites for suitability. Instead, sites were reviewed in isolation, and when the committee found they had not met their housing target, they revisited previously rejected sites with lower thresholds. This is not a robust or strategic approach to site selection.

5. Viability and sustainability – Given the site's challenges—steep slopes, impermeable soil, and the need for significant infrastructure investment—there is no evidence that it can be delivered affordably or sustainably. A developer has already stated that it would not be viable to build here while meeting affordable housing requirements, undermining the rationale for including it in the plan. This is particularly the case when coupled with the danger to life from the road, lack of footpath and blind spots.

6. National Policy Compliance – The proposal fails to meet national policy objectives. It does not comply with the requirement to “seek to further” the National Landscape, nor does it align with policies prioritising the delivery of affordable homes.

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.: Given these legal and procedural failures, we strongly urge the removal of this site from the emerging Local Plan. Including it would set a dangerous precedent for development within the AONB, undermining national and local policy protections for East Devon’s landscape and failing to ensure a sustainable future for Sidbury.

Full name: Helen S MUNDAY

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD26

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

7. The guidance on the consultation document states that the plan should be 'deliverable not aspirational'. The principle of potential for 'economic development' seems to be lacking in planning considerations. The Sidbury business park, seems a case in point, when years after approval, no developer has come forward to purchase and develop the land as a business park. There is a risk that 'history will repeat' with plan Sidm_34. In this case, numerous consultees have expressed concerns about the development, e.g. requiring archaeological digs before commencement, significant upgrading of drainage plans, negative impact on the AONB and the overall adverse nature of the site in a steep sided valley. Not only is there a risk that it will be a challenging site to develop, but that it will not be economical to do so. If approved the Council will no doubt 'tick off' 43 houses from their quota. However, this is totally disingenuous, if the land is never actually developed. The Council is delusional about their plan if applications will never result in the building of much needed homes, and should only include in the local plan, those cases that can be considered economically viable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The definition of what constitutes 'deliverable' should be set out. A discussion of economic viability should be explicitly discussed at local plan stage.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Philip Parsons

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD26

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: It is not legally compliant with the designation of National Landscapes, Specifically, section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 now requires all public bodies to ‘seek to further’ the purposes of protected landscapes. Only local authorities or the Secretary of State can give permission for development in, or affecting, an AONB. As a local authority, you must make sure that any proposals seek to further the purpose of conserving and enhancing the natural beauty of the AONB, for example when: adding utility services, like gas pipes and telecommunications cables or creating public access as part of rights of way improvement The local plan document Strategic Policy OL02 states that the highest level of protection will be given to the landscape and scenic beauty of the National Landscape in East Devon. The site in Sidbury is completely inside the National Landscape. Development in a NL will only be permitted where it avoids harm and contributes to the protection , conservation and enhancement of the special qualities , character and natural beauty of the NL. When discussing the local plan or in the document of the emerging plan there is no mention of how this site being developed with 43 dwellings would either avoid harm or contribute positively to the landscape. In fact it is plain to see that it would cause harm, and a recent planning application admits this in their planning application.

Not only does this site not meet the requirement of policy OL02, in the planning committee meetings it was never discussed or considered. There was mention of restricting the development to a smaller area to reduce the harm to the landscape, but this was reversed later to include the whole site around Furzehill Farm at the request of the developer. The committee mentioned developing the lower portion of the site to reduce the visual impact, but this does not “seek to further”, it is only admitting that harm is being done to the landscape and the committee talked about measures to

reduce that harm. This is clearly in contradiction to the Levelling Up and Regeneration Act 2023.

Furthermore in policy OL02 it states that major development in a NL will be only permitted in exceptional circumstances and where it can be demonstrated to be in the public interest. Again in the local plan discussion it was not mentioned or discussed how this site being developed would be in the public interest, or what the exceptional circumstance was. The committee failed in its duty to consider this in suggesting this major development of 43 dwellings inside the National Landscape. A recent application on this site has been objected to by the National Landscape Department of the council for this very reason.

As an explanation I found the following regarding the recent changes to the legislation with respect to AONB or National Landscape:

In December 2023, the legislation was updated to:

“In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”

What does this actually mean?

The changes to AONB (National Landscape) legislation may seem minor but it's actually quite significant. Whilst the previous duty – to “have regard to” – was a passive duty, the new duty – to “seek to further” – is an active one.

In practice, the previous duty only really required relevant authorities* to take impacts on the AONB (National Landscape) into account. By contrast, the new duty expects them to proactively take steps to positively conserve or enhance the special qualities of the AONB (National Landscape).

*relevant authorities include local councils, local planning authorities, highways authorities, county councils and more.

Natural England has written to AONB (National Landscape) Teams throughout the UK to advise them about what the changes to AONB (National Landscape) legislation mean in practice. DEFRA is also expected to publish further guidance shortly. Natural England's advice letter includes:

The new duty to “seek to further” is an active duty, not a passive one. Relevant authorities must take all reasonable steps to explore how the natural beauty of the AONB (National Landscape) can be conserved and enhanced. The new duty goes beyond mitigation, like-for-like measures and replacement. Relevant authorities should take measures to avoid and mitigate the effects of development. Those measures should be appropriate and proportionate to the type/scale of development. They should also be in line with the AONB (National Landscape)'s management plan. In all cases, the relevant authority must be able to demonstrate how they have actively sought to conserve and enhance the natural beauty of the AONB (National Landscape). And this should be open to scrutiny.

It is plain to see that East Devon County Council has not followed this instruction in proposing the land at Sidbury for developing 43 new dwellings. They were behaving as though the old legislation was in place in only mentioning some minor mitigation measures on the harm of this potential development. This is surprising as the legislation is clearly referenced in Chapter 12 of the emerging local plan “Our Outstanding Landscape”.

This land in Sidbury should be removed from the emerging local plan and not be adopted into the future local plan as it clearly does not comply with current legislation.

I am more familiar with the site at Sidbury as I live there, but I suspect the deficiencies of respecting the national landscape may also be relevant to other sites in the emerging local plan in protected sites.

These comments are from myself, and also supported and agreed with my neighbours Mr and Mrs C Ryan

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the land in Sidbury from the document. Additionally there might be other sites within the AONB that should also be removed as the council did not follow the law with regard to the National Landscape.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To be a sound decision it should be made on solid evidence and be the most appropriate when compared with other options.

The debate about this site being adopted into the emerging plan was superficial at best. The planning committee failed to debate or consider whether this was an appropriate location for a major development and how it could contribute to the National Landscape. There was insufficient data available to make the required decision. For example this site had serious questions about the validity of a safe access and how to alleviate the occurrence of frequent flooding in the area. The county highways had not given an expert opinion or examined the issues at the time of the meeting. The committee made assumptions that the issues could be solved without evidence with regard to the access safety or the flooding issues. Subsequently it has been confirmed that the site could not use road drains to the run off from the site, which makes the development highly questionable in terms of affordability or sustainability. The highways authority has still not investigated whether the proposed access onto the A375 could be viable, with the Town Council and residents clearly arguing that an access onto a narrow main road with blind corners would represent a serious safety risk to cars, bicycles, pedestrians and other road users (the road is not wide enough for two large vehicles to pass at this point). There was confusion as to why a larger site had been put forward on the emerging plan. At the first meeting it was decided to only consider Sidm-34a so as to keep a break between two existing developments. The developer lobbied the planning department and at the second meeting the plan then showed the complete site (34a and 34b) to be on the emerging plan. This was a surprise to all those at the meeting as it had never been discussed or put forward at the formal committee meetings. It was not following the approved process to allow private lobbying to make changes to the committee's output.

The other major failing is that the council process never made any attempt to compare sites, it was a simple go / no go discussion for each site. Even more damning at the end of the session when they realised they did not have enough sites to make their “target” they revisited sites which initially had been rejected, looked at them with lower thresholds, and then approved them to go forward. In developing a plan it would be expected to rank different locations for the suitability of development. Each site could be ranked with various criteria to establish which sites should take priority in being put forward to a local plan the meetings and the document makes no mention or attempt to rank or prioritise one location from another.

Effective the policies need to be achievable and deliverable in the next 15-20 years.

The site considered in Sidbury is inherently challenging. The agricultural fields are on the side of a valley and very steep. It is mainly composed of non-porous clay and has many streams flowing from the surrounding hills. The run off goes currently to a constrained mill leat that was built in the Middle Ages to supply the existing working water mill. There is a history of flooding to the surrounding properties and roads. Traditional methods for alleviating run off issues are ineffective due to no soak away possibilities (impervious soil) and no existing man made drainage solutions. The main road would require upgrades to allow for a safe and viable access to be built. To develop such a challenging site would require a great deal of investment, and there is no evidence that it would be economically viable to develop this site. To back this up a developer has already indicated that they could not make the site work with the affordable housing requirement as these are less profitable to build.

Finally the question is whether the selection of this site would be in line with national policy . As already mentioned the site is not compliant with the need to “seek to further” the National Landscape. Also it will not be compliant with the policies of building more affordable homes due to the large investment needed to turn these steep agricultural fields into a building site. These comments are from myself, and also supported and agreed with my neighbours Mr and Mrs C Ryan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the land at Sidbury from this emerging plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: For example There has never been any mention or discussion about transport links to Sidbury which would require cooperation from other councils. For example better bus links to Exeter would be critical, but never considered.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The council have failed to perform due diligence in assessing potential sites with data and evidence based decisions, and failed to follow section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023. I have made previous statements at the committee meetings but never felt listened to as a member of the public. I feel it is important to be able to represent these points in person to an independent body and gain confidence in the process.

Full name: Helena Ryan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD26

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic Policy SD26 Development Allocation at Sidbury.

Sidbury falls wholly within an AONB. Government planning guidance recommends that 'major development' on AONB land should only happen under exceptional circumstances and only when it can be demonstrated that it is in the public interest. Where is this demonstration that it is in the public interest? All but one person responding to the outline planning permission for this site, have been against it. This would see to demonstrate that it is definitely not in the public interest of those living in the village and who will have to put up with the extra traffic on a narrow and already overburdened road. And it is especially not in the interest of those whose properties will be overlooked and overshadowed by it. Also, as a local authority you are supposed to "Make sure any proposals seek to further the purpose of conserving and enhancing the beauty of the AONB". Clearly, ripping out ancient hedgerows and building over pasture land is not going to further or conserve the beauty of this site. Developments that have been allowed in the village over the past 30 years or so, have all been hidden around the back of the main thoroughfare, presumably in order to avoid this issue.

Further to this, the "Development would be expected to play its role in delivering part of the Sidbury to Sidmouth cycle route through the allocation". The one person in favour of this development was from the Sidmouth Cycling Campaign, who although they want a cycle route, pointed out the current plan of having the multi-use path coming from the site onto Ebdon Lane in order to connect to the phase 1 cycle route, is considerably steeper, approximately a 15% gradient, than the absolute maximum gradient of 8% specified in LTN 1/20. Even ignoring the steepness of the road, the exit from the phase one route onto Ebdon lane would take cyclists downhill on a blind corner on a single

lane road, that although not busy all day every day, certainly has busy periods with farm vehicles so big they take up the entire width of the lane, repeatedly driving up and down it. How anyone taking toddlers in a cargo bike or families with small children on their own bikes, for example, could be expected to use this route is beyond me.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD26

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Sidm_34: While we do not object in principle to the provision of housing in this location, greater care is needed to identify the potential heritage impacts and to ensure that these will be minimised and mitigated through the policy framework. Most importantly, the policy and evidence do not currently identify Sidbury Castle Scheduled Monument – an Iron Age hill fort of massive proportions, located to the west of the site and overlooking it. While we appreciate that at present there are plantations on much of the eastern flank of the monument, there are also clearings that may be expanded in future years. The proposed site allocation would have the effect of connecting a string of housing development to the south of Sidbury. We note that existing development is a more obtrusive presence in the landscape and long views where it occupies an exposed location and employs materials such as white render. Controls on building heights and materials, as well as appropriate landscaping, will therefore be important to ensuring that harm is minimised. The site also encircles grade II listed Furzehill Farmhouse and associated buildings, and forms the rural/agricultural setting on their western side. While the farmstead appears to be somewhat enclosed by vegetation, it would nevertheless be beneficial to retain a linkage between the historic buildings and their rural setting by retaining a broad green corridor between the northern and southern sections of the site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Sidm_34: “.. The site is within the East Devon National Landscape and particular care will be needed to avoid

adverse impacts. It is also located due east of Sidbury Castle, an Iron Age hill fort designated as a Scheduled Monument, the setting of which should be conserved and enhanced. especially on h Higher westerly site parts of the site should therefore remain undeveloped and field boundaries should be reinforced with appropriate planting. where open space provision may be appropriate. Listed buildings are found to the north and east of the site and the Sidbury Conservation Area also lies to the north; proposals will need to be carefully designed to avoid detrimental impacts on these heritage assets, and where possible to secure enhancements. This should include controls on building heights and materials, and the retention of a broad green corridor connecting Furzehill Farm with the wider rural setting.”

SD27

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD27

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.: Further detail is required in the supporting statement for service villages (page 95) to provide clarity around the context of land allocated in Tipton for a new primary school. Requested changes to the supporting statement in relation to Policy SD27 are shown below for additional wording: Service Villages (page 95, para 5.14) “Whilst land is allocated in policy SD27 for a new primary school, Tipton St John primary school is being rebuilt by the Department for Education as part of the School Rebuilding Programme and their current preference is to relocate to Land at Thorne Farm in Ottery St Mary.”

Full name: Neal Jillings

Organisation (where relevant): Summerfield Homes Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD27

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

This brief representation is made on behalf of the landowners of the subject site. It is supported by two indicative layouts; one for the 45 dwellings referenced under Strategic Policy 26 and one for a one form entry primary school, with some limited residential development on the eastern part of the site fronting the main road. We are aware that the existing school suffers from severe flood risk and there has recently been an allocation of funding under the School Rebuilding Programme. There have been previous efforts to relocate the school to Ottery St Mary. In fact Local Plan states that it should be noted that in the event that land is allocated in Ottery St Mary for the relocation of the primary school in Tipton St John then the village would no longer meet the threshold for a Tier 4 settlement and this potential allocation would not be taken forward. We believe that the proposal to take a primary school out of the village is in direct conflict with NPPF(79) and also reference within this Local Plan to a desire to make settlement 'more sustainable'. Actively planning to remove such an integral part of the community's facilities will be counter productive to the future sustainability of the village. We consider that the local planning authority should work in partnership with the education authority to ensure that the school remains in the village. Now that funding has been secured, there will clearly need to be a formal process of assessing suitable sites and we would consider that a site in the village should be given preference over moving the school to the nearest town. If a site is found for a school elsewhere in the village, the subject site should be upgraded to a first-choice allocation for around 45 dwellings. If, on the other, the subject site is considered suitable for a school site, the landowners have intimated a desire to work with the relevant officers of the District and County Councils to potentially deliver this. As part of a comprehensive scheme for the site, we propose a small amount of self/custom build housing. Release of a small amount of land for housing would facilitate the possible release of land for the new

school. This is a genuine offer, and we would be happy to discuss further with both the District and County Councils. We commend the subject site to the LPA and would like to confirm our availability to discuss this site further with relevant officers and ward members on either option shown on the attached. We appreciate that setting out such a complex and multi-faceted document is a difficult task for the local planning authority. We look forward to working through our comments at the eventual examination.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

SD29

Full name: Alan Lascelles

Organisation (where relevant): POW+R Group

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Our District Councillor proposed at least 50 houses adjacent to Bramley Gardens, totally against the wishes of villagers. This is a critical site in the village as the development would 'eat into' the green wedge between Whimble and Cranbrook. In addition, it is regrettable that he did not grasp the village feeling towards the old historic Cricket Ground, when there was evidence available to indicate villagers' feelings. Whimble Neighbourhood Draft Plan -Appendix II provides a clearer view of village opposition: EDDC - Local Plan Common Place Feedback. Consultation period – 7th November 2022 until 15th January 2023. (Spread sheet data)

Whim_11 - Station Road (Old Cricket Ground) – Extracted from EDDC Speed sheet
Dissatisfied (15) Unhappy (49) Neutral (8) Happy (2) Satisfied (6) Total
Responses (80) Whimble Site 8 - land west of Church Road and Bramley Gardens was
discussed. *** Personal details have been removed ***, speaking for the development,
provided false /inaccurate information to the committee, which makes the decision
making unreliable in law. In addition, I am not aware that *** Personal details have been
removed *** had visited the site prior to making the decision to incorporate the site into
the village built up area. EDDC - Local Plan Common Place Feedback. Consultation
period – 7th November 2022 until 15th January 2023. (Spread Sheet data) Whim_08 -
Land west of Church Road and Bramley Gardens. Dissatisfied (9) Unhappy(77)
Neutral(0) Happy (0) Satisfied (1) Total Responses (87) Councillors have
acted without due diligence and unprofessionally in making 'seismic' major decisions
without fully appreciating the evidence gathered about what development is acceptable
and what is not by the citizens of Whimble. Localism matters, but this has been

steamrollered by the inadequately informed. The EDDC draft Local Plan indicated only 41 houses, but now we have 83 houses. This is totally unacceptable and an unsafe decision. Accordingly, one needs to determine the true motivating forces behind the decision to build twice the number?

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The only descent modification is to eliminate Whim Site 8 from the draft local plan. This needs to be linked to the Localism act 2011 indicates that the neighbourhood planning provided an opportunity for “meaningful” community engagement in the planning process. With the evidence gathered from the emerging Whimple Neighbourhood Plan the villagers has spoken. But the councillors have not listened. The Emerging Neighbourhood plan is opposed to all development on the western flank which provides a vital and important green belt between. Cranbrook and Whimple. In addition, it is harmful to the process when Councillors provide unreliable / illinformed information to the decision making. Furthermore, there is a clear conflict of interest as a Parish Councillor and a District Councillor and in the role of Chair of the Strategic Planning Committee. You can't act in the interests of villagers but then go totally against the village in which you live.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The local district Councillor has not co-operated professionally with the POW+R Group. The Parish Council has not co-opoerated professionally with the POW+R Group. N.B. The POW+ Group undertook 90% of the drafting of the Whimple Neighbourhood Plan, utilising a wide range of skills relevant to the task.

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.: I have said what needs to be said

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): DAAB Partnership

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(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.:

Land off Station Road (Ref: Whim_11)

Our client fully endorses the allocation of land at Station Road for residential development.

Representations were also made to the Local Plan Reg 18 Further Consultation in June 2024, which also advised of our client's full support to the residential allocation. These have been attached at APPENDIX 1.

Our client is willing to work closely with EDDC to achieve the objectives of the policy in relation to this site.

Land to the west of Bramley Gardens, Whimble (Ref: Whim_08a)

The above site had been identified on the Reg 18 Emerging Local Plan Policy Maps as a 'second choice site' referenced as LP_Whim_08. Representations were made to the Local Plan Reg 18 Further Consultation in June 2024, which strongly encouraged the second-choice allocation ref: Whim_08 to be upgraded to a Preferred Allocation for residential development for Whimble. As above, the previous representations have been attached at Appendix 1.

The Draft Strategic Policy SD29 now includes this site as a residential allocation for Whimble. Our client's fully support the allocation of land to the west of Bramley Gardens for residential development and are prepared to work with stakeholders to achieve the objectives of Policy SD29.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land off Broadclyst Road (Ref: Whim_07)

The above site had been identified on the Emerging Local Plan Policy Maps during the Reg 18 Consultation of the Local Plan as a 'second choice site' as referenced LP_Whim-07 and coloured orange on Figure 2 (see page 4 of the attached document).

On the 1st November 2024, EDDC's Strategic Planning Committee (SPC) met to consider a range of further allocations for sites within the District of East Devon.

With regard to site ref: Whim_07, SPC was advised that further work looking at the critical drainage matters for Whimble which had not been completed due to the high cost of the technical work. It was proposed by SPC not to include this site as a further allocation for development due to the flood risk covering half of the site. SPC did however consider that the inclusion of half of the site, situated outside of the floodplain could be included within the BUAB to allow windfall development to come forward in the future.

On the 22nd November 2024 SPC considered a report on amended settlement boundaries and draft allocation plans for the emerging Local Plan. For Whimble, the built-up area boundary (BUAB) had been amended to include further land, as shown in Figure 3 (see page 5 of the attached document). The revised BUAB included within it, land off Broadclyst Road, highlighted for completeness, by the red circle.

The Settlement Boundaries Evidence Paper [ED LP Settlement Boundaries Evidence Paper 222 Nov 2024 SPC Version 2] supported the report taken to SPC and set out how the boundaries have been drawn for individual settlements and why any changes have been made. The report states "The strategy of the emerging local plan differs from the adopted plan in wanting to promote some opportunities for housing within the settlement boundaries so that they guide but do not stifle the outward growth of settlements in line with the plan strategy."

The report references the inclusion of land off Broadclyst Road and states “Most of the areas to the northwest of the village that were included in the 2022 consultation plan have now been excluded due to their retention in the Green Wedge. The exception is a house and part of a field north of Manley Close, as agreed at the Strategic Planning Committee meeting on 1st November 2024.”

The Local Plan Regulation 19 version, of which is being consulted on, shows the BUAB to have been pulled back to not include Whim_07.

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.:

Given the previous history of the site being included within the settlement boundary for Whimple, our clients wish to propose their land as suitable for development and deliverable within the plan period. It is considered that the land is centrally located with easy pedestrian/cycle access to Whimple’s services, facilities and railway station and that it can be brought forward at an early stage within the plan period to meet the objectives of Whimple to support development that meets local needs.

Our clients therefore consider that the site should be included within the BUAB for Whimple and allocated for residential development.

Full name: Roger Baker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The density is to intense for the allocated area.

The infrastructure to support this development is not there.

The site lacks safe pedestrian access and the traffic impact on access and egress through Bramley Gardens onto and from Church Road is unsustainable.

Evidence of the capacity of Church Road to cope with the volume of existing traffic and the safety of pedestrians in what is in large parts single road, is currently under review and of concern to a number of residents.

The site forms part of the Green Wedge between Whimble and Cranbrook.

There is no justification for the need of additional housing in this area given the permission for the development 1500 houses, immediately adjacent in the next phase of the expansion of Cranbrook.

Full name: Robin Barker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 8a is contrary to the agreed plan for the area and commitments made by Cranbrook developers for the retention of the 'green wedge' - commitments which we took into account when moving to the village 12 years ago

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.: Development should be such that the green wedge is retained - ie not between Whimple and Cranbrook

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: My house is on the narrow single track part of Church Road - a narrow section with no pavements and along which residents of the 8a development will have to pass to access the village shop, church, school, station, village hall and school. This is already congested and traffic frequently takes advantage of my driveway in order to pass (thus trespassing). If we were to legitimately erect a gate at the end of the drive then traffic

would grind to a halt. This is already a major problem and any further development will make it significantly worse.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Develop elsewhere off the London Road

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The proposed developments have already been rejected by the experts in the field, following extensive investigation and expert analysis as well as consultation. Overturning this rejection is contrary to the council's duty to cooperate

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Peter Montgomery & Elaine Bennett,

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Our main objection to the proposed developments in Whimble are road infrastructure, both to and through the village, which are very dangerous particularly to pedestrians, cyclists, horses etc and any increase in population will only exacerbate this problem. A footpath through the orchard north of Whimble 08 is hardly going to change the situation. The road infrastructure in Whimble is similar to Branscombe - a long pavement-less lane both to and through the village and as far as I can find out just ten new homes were proposed for Branscombe in 2016 (and that's too many.) If they laid a new road with pavements from Hand and Pen (old A30) connecting the south and north of the village that should satisfy our main health and safety concerns but we would be losing our green wedge as well as prime agricultural land and it would be undoubtedly harmful to wildlife. As deer use the green wedge to commute between north and south Whimble, it's essential to maintain a buffer between Cranbrook and Whimble.

Full name: Henry Bomby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The proposed development is being built on a green wedge which must be kept protected to separate Whimple, its village and services from the huge housing developments in Cranbrook.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Proposed building area often floods and the sizing is too big, Whimple only has single track lanes in and out of the village. During primary school drop off the village is already a log jam. The village cannot accommodate an additional 50-80 more families.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Dennis & Su Calver

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: My husband and I wish to comment on the strategic allocations for Whimble, particularly WHIM08 and WHIM11.

As residents of the village we regularly walk up and down Church Road and along, past the school, to Whimble Surgery. At any time of the day walking on this very narrow road, leaves us very exposed to being hit by cars, motor cycles, delivery vans, delivery lorries and tractors. It is impossible to improve the safety of this road due to the historic layout of residential properties. On regular occasions, eg refuse collection/ recycling collection, the road is blocked for both pedestrians and traffic. More and more people are making online purchases and having food deliveries from major supermarkets, adding to the traffic density throughout the village, during the day and into the late evening.

Any housing developments that require residents to utilise Church Road, by car or on foot, will increase the dangers of injury / death or severe damage exponentially. To make any planning decision without fully exploring these dangers, would be foolhardy and probably illegal.

We urge you to fully understand our community and its road layout, before making any strategic decisions in respect of Whimble.

Thank you

Full name: Hannah Clarke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

SD29: Development of allocations at Whimble - are not sound for a variety of reasons. The lanes throughout the village are already busy and at times dangerous (a community speed watch group is now needed following advice from the Police). Existing residents' vehicles are already regularly using the main routes in and out of the village, including many parents dropping off and picking up school pupils twice a day. Also, the main route (Church Lane) into the village is not wide enough for two cars to pass in many places along it. Furthermore, it does not have a footpath along one side of it to allow pedestrians to safely walk into, out of and around key parts of the village. It is inappropriate to build new homes without basic infrastructure in place to keep people safe. Other sites - not within Whimble village - that can be directly accessed from London Road, the main A30 (or other two-lane A roads) should instead be considered for new housing in East Devon - for example, near to the soon to be built services - the McDonalds and farm shop site - at Daisy Mount. Also, there are already thousands of houses being built in neighbouring Cranbrook and Rockbeare to meet affordable housing and new housing quotas in East Devon. The Cobden Lane development phases is already within the Whimble Parish and will provide new housing, including affordable housing. The other countryside areas surrounding Whimble should be preserved as important 'green spaces/areas' for wildlife and plants to live and flourish so residents see and benefit from countryside being around them. Furthermore, the village primary school is already at capacity and if plans proceed to building 83 more homes, and many of these houses are occupied by families with children, where are these children going to go to school? It certainly won't be the local primary school and it seems that this consequence of building new houses in Whimble has not been considered fully or properly. Also, having a possible 166 additional cars (or even more) driving around the

narrow lanes of the village will be completely impractical and lead to all kinds of environmental and traffic issues - which do not need to be created. Loss of the remaining wildlife and green countryside areas in this part of East Devon is also a reason why building 83 houses is not necessary. Swathes of fields and hedges have already been sacrificed east of Exeter to make room for the ongoing building phases of Cranbrook's new town development so no further green spaces need to be removed in this area to build houses, patios, concrete driveways etc. Green spaces in areas of Whimble have already had to absorb wildlife displaced by nearby house building - where will these creatures of nature and plants thrive if more of their habitat/growing space is taken away? In addition, the increase in traffic (cars, pick-ups, vans, lorries from developers in the first instance and then residents of the new houses) will lead to greater amounts of pollution and damage to both the environment and the conditions of the roads - already full of potholes and crumbling at the edges. An increase in traffic will be harmful to local air quality in the future and to animals, plants and humans in the surrounding environment. Light pollution will also become more of an issue as well.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

I consider it necessary to have Whim_08a and Whim_11 removed from the EDDC Emerging Local Plan and advise that the 83 suggested new homes being allocated elsewhere in the area (outside of Whimble Village), where there is appropriate infrastructure and housing developments should be built adjacent to existing main roads (A roads) where two cars can easily pass each other, and where pedestrians can easily use footpaths to access regular bus routes. No alternative sites in Whimble, previously suggested, should be revisited or explored by the Parish Council or any other group - as they have already been ruled out and reasons for this clearly provided earlier in the process.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The information received by Whimble residents earlier in the consultation, following a presentation of proposals in the Victory Hall, was that the all of the sites initially put forward in Whimble were not suitable for mass house building

for one reason or another (access issues, potential flooding issues etc.) Then, more recently, residents have been told that 83 houses now have to be built within the village area. This number is not appropriate for this village. In fact, only about 4 affordable homes are needed over the next 5 years - which should easily be achieved within the Cobden Lane area of proposed development - which is already within Whimple Parish.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Angela Cottrell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Please find attached comments regarding planning to build houses on the sites whim_11 and whim_8

Objection to Proposed Development WHIM_11 (33 Houses on the Old Cricket Pitch, Whimble)

Dear East Devon District Council Planning Department,

I am writing to object in the strongest terms to the proposed development known as WHIM_11, which seeks to build 33 houses on the old cricket pitch in Whimble. This site has been subject to multiple planning applications in the past — all of which have rightly been refused. The reasons for those refusals remain entirely valid and are, if anything, even more pressing today.

Flood Risk and Environmental Impact: The WHIM_11 site includes land that floods frequently. The adjacent fields are often waterlogged, and the stream at the bottom of the field has overflowed multiple times this winter alone. With increasingly unpredictable and extreme weather events, this area is wholly unsuitable for residential development. Building here will raise the risk of flooding to nearby homes and put future residents at unnecessary risk. The unsuitability of this site for development due to flood risk has already been acknowledged by the East Devon local plan.

Land of Local Importance: The site is designated as land of local importance, which should offer it protection from speculative development such as WHIM_11. This status is in place to safeguard green spaces that matter to the local community. Ignoring this designation would contravene East Devon planning policy and weaken trust in the planning system.

Protected Species and Wildlife Habitats: The area surrounding the WHIM_11 site supports diverse wildlife, including legally protected species. Bats are regularly seen foraging and commuting across the site, and otters have been spotted using the stream. Both species are protected by law, and any disturbance to their habitat from construction would be highly damaging — and potentially unlawful.

Trees and the Natural Landscape: The site contains a historic oak tree and several other mature trees with Tree Preservation Orders. These trees form an important part of Whimble's natural and visual heritage and provide crucial habitats for local wildlife. The risk of damage to them during construction is high, and their loss would be a significant and irreversible blow to local biodiversity.

Road Safety and Traffic Concerns: Whimble's narrow lanes and limited pavements make it wholly unsuitable for increased traffic volumes. In many parts of the village, only one car can pass at a time. The addition of 33 homes — potentially bringing 60+ cars — would lead to congestion, safety risks for pedestrians, and increased pollution in a village where walking is already compromised. Crucially, any future proposals should avoid bringing additional traffic through the centre of Whimble, where the infrastructure is simply not capable of safely accommodating it.

Unsuitable Infrastructure and Strain on Local Services: Whimble does not have the capacity to support a development of this size. Public transport bus links are limited, parking is scarce, and services such as schools and GP practices are already stretched. In contrast, nearby Cranbrook has been specifically developed to accommodate housing growth. It has modern infrastructure, designated expansion areas, and services designed to absorb additional demand. Directing development there is far more appropriate and sustainable.

Loss of Green Space and Village Character: The old cricket pitch is part of Whimble's heritage and rural charm. Green spaces like this are becoming increasingly rare, and their loss cannot be reversed. Allowing WHIM_11 to go ahead would fundamentally alter the character of the village and erode the community's identity.

In summary, WHIM_11 represents an unsustainable, inappropriate, and damaging development for Whimble. It conflicts with environmental protections, places unacceptable pressure on local infrastructure, and would significantly harm the fabric of this rural village. I strongly urge the Council to reject the application once again, in line with previous decisions and the views of the local community.

Full name: Angela Cottrell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Old Cricket pitch which is the land being proposed to be built on is subject to a Land of Local Importance designation. This therefore prohibits the use of this land to be built on for the purpose of dwellings.

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.: There should be no dwellings built on the Land of Local importance.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This proposal is not sound as it is not justified compared with other proposals. The risk to the village of increased traffic through the village is not justified compared with other proposals that would keep traffic to the outskirts of the village or the outskirts of Cranbrook. There is no solid evidence that this proposal at whim_11 is the most appropriate and it has been acknowledged that there is significant risk of flooding in this area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: No development should increase traffic through the centre of Whimple. Any development should be on the extreme outskirts which is closer to bus links.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Impact on the environment: the proposal acknowledged the risk of flooding. The stream at the bottom of the field regularly floods and has flooded a record number of times this winter. There are a number of protected trees within this field which are the habitat for wildlife including woodpeckers and squirrels. In addition otters have been seen in the Slewton Crescent area near the stream backing onto the field and bats are commonly seen. Both species are protected by law. With regards to infrastructure the impact of potentially 60 more vehicles through the village carries significant risk to residents as there are no complete pavements and both children and elderly residents are particularly at risk. Planning permission has been declined on this site three times in the past therefore it is impotent to consider alternate options.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Aubrey Curry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Whim_08- The EDDC strategic Planning Committee rejected the plans on grounds of unsuitability and no further grounds of justification have been proposed Therefore the grounds of unsuitability still stand.

Full name: Paul Davies

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EDDC Emerging Local Plan Consultation I wish to place on record my objections as a local resident of Whimble in respect to a specific element of the EDDC Emerging Local Plan Consultation, namely policy SD29: Strategic Allocations in Whimble, and particularly to the allocation of Whim_08a (Land west of Bramley Gardens) site. My objections are on the grounds of soundness in that the allocation and policy is not based on solid evidence. It appears that the EDDC Strategic Planning Committee expressed similar objections at their meeting held on 1 October 2024 when they voted not to allocate this site. The following text is taken from the Whimble Parish Council submission and is included to add context; The EDDC Strategic Planning Committee considered the Whimble Site Selection Report at a meeting on 1 October 2024. Professional planning officers identified and assessed the potential sites in Whimble and using their professional judgement, backed up with sound evidence recommended to Members whether to allocate the site or not. In the case of Whim_08 site, officers recommended that the site was not allocated for the following reasons: · Scale of development incompatible with spatial strategy. · Site lacks safe and convenient pedestrian access to services and facilities in the village. · The site forms part of the ‘Green Wedge’ between Whimble and Cranbrook. · Forms an important part of the very attractive rural landscape setting for the settlement. · Potential impact on unconfirmed wildlife site. · Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation. In the earlier phases on consultation, Planning Officers held a Public Consultation event at the Victory Hall, Whimble. This site was never considered as being appropriate for development at that event and, in fact, when local residents asked the question, the Officers in attendance vehemently denied that it was a possibility for consideration. At the meeting on 1 October 2024, Members of the committee voted to go with the officer recommendation and not allocate the site. However, at the Strategic Planning Committee meeting on 1 November 2024 Members did a complete u turn and

decided to allocate part of the site, contrary to Officer recommendation. There was no justification or reason given as to why this site was picked above any others in Whimble or other sites in the east Devon area. Also no additional work appears to have been completed by officers to assess the risks relating to this site before allocating it. This gives the appearance of the Strategic Planning Committee having a knee jerk reaction to needing to allocate additional houses across the district without considering a fully worked up proposal or sound justification (based on evidence and facts), as to why the site should be allocated (partially or otherwise). This site allocation report also considers 'If whole site is not suitable for allocation, could a smaller part be allocated?' The view of the professional planning officers was 'No'. Again, this leads Whimble Parish Council to challenge the soundness of any allocation of this site. The remainder of Whimble Parish Councils submission outlines in detail the reasoning for the unsuitability of this site and I do not wish to replicate that explanation here, however, I would wish to comment on the actions of the Strategic Planning Committee which appear to display either an unacceptable level of incompetence or a contemptuous attitude to the local community. The Nolan Principles clearly set out the standards expected of those in public life, not least elected officials in the service of their constituents. Based on the evidence presented it is apparent that the Strategic Planning Committee fully agreed with the views of the local Parish Council and their own professional Planning Officers at their 1 October meeting when this site was deemed to be unsuitable. As a local resident I, and others, were reassured that the Committee had recognised the strong evidence presented and factored this into the emerging local plan. It is unfortunate that this assurance was subsequently dissipated at the committee meeting held on 1 November 2024. The lack of any coherent rationale for the U-turn on this site by the Strategic Planning Committee within the space of a few weeks and with no apparent additional assessment to the contrary is startling, particularly in light of the disproportionate amount of development on the old A30 corridor when compared to other parts of the District (much of which has afforded no development at all in recent years, one assumes to the delight of relevant local councillors). I would contend that the behaviour of the Strategic Planning Committee in turning a blind eye to their own previous decision displays an attitude to the local community that, at best can be described as lackadaisical and an attempt to appease the requirements of National Government. The lack of honesty, transparency and accountability in failing to provide appropriate rationale to the local community could more appropriately be described as a failure to uphold the basic values of The Nolan Principles. Frankly, local residents deserve more respect. Therefore, I would like to add my objection alongside other local residents who want to see the modification of site Whim_08a being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the district, where there is more appropriate infrastructure. I am also forwarding this response to the local District Councillor in his capacity as Chair of the Strategic

Planning Committee with a formal request that, as a matter of courtesy, the rationale for this decision be provided to local residents.

Full name: Simon John Davies

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Whim 08a - Land West of Bramley Gardens allocation of 50 houses is unsound.

(1) The quantity of housing exceeds the forecast local need and is disproportionate to the size of the village. (2) The site is in the green wedge between Whimble and Cranbrook. (3) the site does not have safe pedestrian access to village services, including the school. (4) Vehicle access to village services, especially the shop and the school, is on single track road, which at peak times is already choked with no free parking spaces in the village centre. (5) Vehicle access to Church Road would increase danger to pedestrians and cause further congestion in Church Road. (6) There is no bus service from Whimble Village to Exeter and the train times to Exeter are impractical for shoppers and some commuters.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Delete Whimble 08a.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mary Davis

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

I live at no. 39 Slewton Crescent, Whimble and strongly object to the proposed development at Whimble_11 for all the reasons cited in the parish council's response including drainage/flooding issues, unsuitable road access leading to increased traffic through the village and the need to preserve natural habitat. The land is also of local importance as it is the Richard Whiteway Memorial Ground and the intention was that the land should not be built on and can only be used for recreational activities.

Full name: Amanda Denton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live at no 32 Slewton Crescent and strongly object to the proposed development at Whimple_11 for the reasons cited in the parish councils response including drainage/ flooding issues, unsuitable road access leading to increased traffic through the village and the need to preserve a natural habitat. I believe the Richard Whiteway Memorial Ground land is also deemed land of local importance and should not be built on as deemed by EDDC planning officer.

Full name: Aidan & Jayne Doherty

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Objecting to EDDC Emerging Local Plan: Whim_08a

We strongly disagree and fully object to policy SD29: Strategic Allocations in Whimble, particularly to the allocation of Whim_08a (land west of Bramley Gardens) site in the EDDC Emerging Local Plan. The objection is on the grounds of soundness in that the allocation and policy is not based on solid evidence.

The EDDC Strategic Planning Committee initially rejected the site on October 1st 2024 following professional planning officers' advice that it was unsuitable due to: incompatibility with the spatial strategy, lack of safe pedestrian access, Green Wedge status separating Whimble and Cranbrook, impact on rural landscape & wildlife and flood risk requiring further assessment. Despite this on November 1st 2024, the committee reversed its decision, without justification and against the original evidence. No additional assessments were carried out to support the allocation raising serious concerns about the decision.

Whim_08 forms part of the 'Green Wedge' between Whimble and Cranbrook

We challenge the soundness of the proposed allocation due to the Green Wedge. Allocation of this site would potentially damage the individual character and identity of Whimble. This site forms an important part of the very attractive rural landscape setting for the settlement of Whimble. The EDDC Emerging Local Plan Policy OL05: Green Wedges states 'Within green wedges, as defined on the policies map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.'

This would also lead to settlement coalescence between Whimble and Cranbrook, which is a material planning issue, and clearly demonstrates that this site should not be allocated in the Local Plan. This was the view of the EDDC professional Planning Officers as stated in their report 1st October 2024.

Scale of development incompatible with spatial strategy

The Strategic Planning Committee have already approved the Cobdens area of Cranbrook part of which is within the Whimble Parish boundary to build 1500 houses, a school and a traveller site. These sites will have a far better infrastructure than Whimble Village so why has the additional housing requirement not been allocated at these sites.

The EDDC Site Allocation Report for Whimble states Whimble is a 'Tier 4' settlement, where the draft local plan seeks to promote limited development to meet local needs. The original proposed development of up to 180 dwellings on Whim_08 is excessively high in relation to the scale of the existing village. This would suggest that an additional 396 people based on 2.2 people per household are going to be added to the current Whimble parish population of circa 1900. That's an increase of 24% which is a ridiculous amount of expected growth for a village and incompatible with spatial strategy. Policy SP01: Spatial Strategy section E states 'Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.'

The total allocation of 83 homes in Whimble is not a 'limited development' (Whim_11 total 33 homes; Whim_08a total 50 homes), especially when the Whimble Housing Needs Report lists a significantly lower figure. This also represents 183 more people in the village (working on 2.2 people per household) or another 9.6% increase in the number of people living in this village. When working on the Whimble Neighbourhood Plan, the Parish Council commissioned a Housing Needs Survey and the results in the report states 'a need for at least 4 affordable homes within the next 5 years.' The housing allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01: Housing to address needs, which states 'this will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence

document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.’

Site lacks safe and convenient pedestrian access to services and facilities in the village

Church Road is the main route into the Village and is a narrow and dangerous road. Access to the site and potential development would be through Bramley Gardens and onto Church Road. The section of Church Road nearest to the Square and village shop is single track road with houses either side of the road. There is no pavement along the stretch of Church Road to The Square and School Hill nor is there room for a pavement. The villagers and Parish Council have raised concerns about the volume and speed of traffic on that road.

I was a parish council meeting recently and they are so concerned about the volume and speed of traffic along Church Road that they have created a Community Speed Watch Group to monitor the traffic and speed along Church Road. The issue was raised as to why the Speed Watch Group had not undertaken any monitoring to date with speed guns along this route and the answer was because the police have stated it ‘was too dangerous in terms of where to record the speed of traffic and traffic monitors safety was at high risk!

To access the village shop in the Square and Whimble primary School in School Hill we have to walk down Church Road which has no pavements. There is no safe and convenient pedestrian access to services and facilities in the village. To ensure safety most people will use their car or vehicle to access the village shop or primary school. This is not sustainable and surely would be against EDDC Emerging Local Plan Policy TR01: prioritising walking, wheeling, cycling and public transport and is also contrary to the EDDC Climate Change aspirations.

Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation

Part of is at risk of flooding and does flood as we have witnessed over the 14 years we have lived here. A full survey would be required to understand the nature and extent of the risk before consideration could be given to any allocation. Our understanding is that

planning officers have not carried out further work relating to the flood risk before consideration was given to a partial allocation. There is no sound evidence for allocating this site in the EDDC Emerging Local Plan and it is contrary to Policy AR01: Flooding.

Potential impact on unconfirmed wildlife site

There is an abundance of wildlife and development of this site would be contrary to EDDC Emerging Local Plan Policy PB03: protection of irreplaceable habitats and important features. As a local resident with our property backing onto Whim_08, I can confirm there is a huge amount of wildlife which is home to little owls, great spotted woodpeckers, badgers, deer, crows, green finches, bats, badgers, hedgehogs and more.

A public consultation was held in Whimble by the planning officers in the very early phases of the strategic plan consultation. Whim_08 was never considered as being appropriate for development at that event and when local residents asked the question like us, the planning officers in attendance vehemently denied that it was a possibility for consideration, nor should it be considered.

At the meeting on 1 October 2024, Members of the committee voted to go with the officer recommendation and not allocate the site. However, at the Strategic Planning Committee meeting on 1 November 2024 Members did a complete u turn and decided to allocate part of the site, contrary to Officer recommendation.

There was no justification or reason given as to why this site was picked above any others in Whimble or other sites in the east Devon area. Also no additional work appears to have been completed by officers to assess the risks relating to this site before allocating it. It looks like the Strategic Planning Committee have panicked and they need to allocate additional houses across the district without considering a fully worked up proposal or sound justification based on evidence and facts, as to why the site should be allocated, partially allocated or otherwise.

This site allocation report also considers 'If whole site is not suitable for allocation, could a smaller part be allocated?' The view of the professional planning officers was 'no'. We challenge the soundness of any allocation of this site, full or partial.

We are totally against the proposed size and location of the development. It is the view of the Parish Council and us that development would be better placed elsewhere in Whimble or in Cranbrook or elsewhere in the district where there is appropriate infrastructure. This is also our view as we have very poor infrastructure within Whimble. There is no sound justification as to why the Strategic Planning Committee decided to go against the professional judgement of the Planning Officers and allocated this site in the Emerging Local Plan. Also, in terms of soundness, the Strategic Planning Committee does not appear to have fully considered a number of other options that could have been chosen.

Whimble Parish Council is looking at site allocations as part of the evidence base for its Neighbourhood Plan. A number of sites have been put forward which are:

Whim_03 Land to the south of Grove Road Whim_07 Land south of Broadclyst Road
Whim_13 Land north side of Grove Road Whim_18 Land to the east of Church Road
Whim_20 Land to the north of Plumtree Lane

The Parish Council's preference would be that a site is allocated to the east of Church Road (Whim_18) so that it is nearer to the established infrastructure near Hand and Pen. It is appreciated that there are constraints to these sites but the Parish Council challenges and us as residents also challenge there are constraints with site Whim_08a, hence why the EDDC professional Planning Officers recommended that the site was not allocated.

Whimble Parish Council believes that Policy SD29: Strategic Allocations for Whimble, specifically site Whim_08a is not sound, as the decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made to partially allocate the site. Therefore, Whimble Parish Council and local residents want to see the modification of site Whim_08a being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the district (and outside of Whimble Village which is a Tier 4 settlement) where there is appropriate infrastructure.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We do not believe that the EDDC Emerging Local Plan policy SD29: Strategic Allocations in Whimple is sound, and therefore site Whim_08a should not be allocated.

Full name: Philip and Rebecca Dominy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live at 35 Slewton Cr, Whimble and object to the proposed development at Whimble_11, for all the reasons cited in the parish council's response. These include drainage/flooding issues, unsuitable road access, increased traffic through the village (already a safety hazard at peak times with school buses trying to get through the narrow road through centre of the village and children walking to school), plus the need to preserve the DEFRA 'priority habitat (woodland and orchard)' and several protected trees, notably the one in the middle of the land. Furthermore, 33 houses on this small site is too many. It was considered unsuitable for development in the past, so what has changed?

Full name: Rebecca Dominy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to object to the proposed development at Whimple_11. I live in Slewton Crescent, Whimple, adjacent to this land. It is my understanding that the land was deemed 'Land of local importance' and therefore should not be built on for housing but only used for activities which retain its open nature. I understand that it is also classed as priority habitat (woodland and orchard) and therefore contrary to EDDC Emerging Local Plan Policies PB02. In addition to this, building 33 houses on this land is too many for the space, and would increase traffic in the very narrow lanes nearby, especially through the centre of the village which is already a log-jam at peak times and a safety hazard for the children walking to the primary school. I understand there are protected trees on the land, in particular the tree in the middle of the land. Part of the land is subject to flooding and further development would risk flooding further downstream, which is already an issue.

Full name: Emma Downs

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Whim_08 site is on a scale of development incompatible with spatial strategy. The decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made . Furthermore, the site lacks safe and convenient pedestrian access to services and facilities in the village. The site also forms part of the 'Green Wedge' between Whimble and Cranbrook. This land forms an important part of the very attractive rural landscape setting for the settlement. It is also highly likely to have a negative impact on wildlife. Of great concern is the risk of flooding, and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As the decision to allocate Whim_08 went against the solid evidence provided by the professional Planning Officers report and recommendations I don't think modifications can make this part of the development sound.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jenny Fells

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

These are my points regarding Whim_08 site

- The size of the developement seems out of proportion to the size of the village
- Lack of pedestrian access to amenities is of GREAT CONCERN
- This site is preferable to others insofar as the amount of traffic passing 'through the square' will be somewhat less with this plot of land than with many of the others, but any increase will be most unwelcome
- Further work must be done to understand the nature and extent of flood risks. For example, surface run off cascading into Cobden Lane and the village square would be disastrous The professional judgement of the planning officers was that this site is not suitable. Why seek professional advice and then ignore it?

i think that it would be preferable to have additional housing built near to Hand and Pen or for the Cobden Lane site to be increaed. Both of these sites would prevent a large increase of vehicular and pedestrian traffic funneling in and out of Whimple square on a very inadequate road.

The only other way i can think of to increase housing but not traffic, would be to build a retirement village. This would also have the benefit of releasing family houses onto the open market.

Full name: Jane Gething

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I do not know.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details 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 planning officers recommended that the site should not be allocated due to the following points: No convenient pedestrian access to services and facilities in the village- the roads are very narrow, there are no pavements and no streetlights. This site is part of the green wedge, which should divide Whimple and Cranbrook- building on Whim_08a could lead to the two settlements becoming joined. There will be an impact on the rural landscape and wildlife sites. There is a risk of flooding in the area, which would be exacerbated by an increase in non-permeable surfaces such as roads, roofs, car parking areas etc.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not develop this site.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The transport connections do not support an increase in homes due to the narrow, dangerous road plus the lack of bus services and a reduction in the number of train stops. I do not believe that the village needs 83 new homes based

on the housing needs survey. I do not feel that the environmental protection has been thoroughly thought through with the risk of flooding and the loss of wildlife sites. The infrastructure cannot cope with development of this size due to the narrow roads, small village primary school, lack of safe parking and the lack of car parking. It would be unsafe for the pupils to walk to the outside facility (MUGA) for PE lessons with an increase in traffic on the roads and more cars parked.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rebecca Giffard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: As I do not have legal training, I am unable to confirm that it is or is not legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of land Whim_08a is not sound for numerous reasons:

1. The site forms part of the Green Wedge. The EDDC Emerging Local Plan Policy OL05 states that development should not be allowed on Green Wedges if it "damages the individual character or identity of a settlement or could lead to or encourage settlement coalescence,". Building on Whim_08a would therefore be in breach of this policy in two ways. Firstly, it is likely that building here would lead to coalescence with Cranbrook due to the geographical closeness of the Cobdens development. Secondly, this in turn would lead to Whimple and in particular the Bramley Gardens area of the village, losing its individual identity and becoming part of the suburban sprawling spreading east of Exeter.

2. The proposed development is incompatible with spatial strategy. The EDDC Site Allocation Report states that "Whimple is a 'Tier 4' settlement, where the draft local plan seeks to promote limited development to meet local needs". A recent Housing Needs

Survey commissioned by Whimble PC identified the need for 4 affordable homes within the next 5 years. The proposed developments of Whim_11 or Whim_08a individually are excessively beyond the locally identified need. In addition, the development at the Cobdens of 1500 houses which falls within Whimble Parish Area meeting (and exceeding) the identified need of 4 houses. No more are needed within the village.

3. The site lacks safe and convenient pedestrian to the village. Access is onto Church Road which is narrow yet extremely busy especially during peak times such as 9am and 3.30pm for the school run. The Police have confirmed that Church Road is not recommended as a safe route to the Primary School, village shop, church or train station. The building of any more homes in the village will only add to this hazard.

4. The allocation of Whim_08a goes against Planning Officers' recommendations . Consultation in an earlier phase had deemed this site unsuitable for development (even partially) yet the Strategic Planning Committee have ignored this recommendation without any justification of reason making the allocation unsound.

5. The site is at risk of flooding.

6. Development of the site could have impact on wildlife and therefore contrary to EDDC Emerging Local Plan Policy PB03: protection of irreplaceable habitats and important features.

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 Whim_08a as an allocated site. No building should be allowed there. Limit building on Whim_11 to 4 dwellings to meet the local need identified.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I do not think this development is compliant with the duty to co-operate. The National Planning Policy Framework has not been adhered to as Effective Cooperation has not been maintained. Section 3, paragraph 24 states Strategic policy-making authorities should engage with local communities and relevant bodies. There has not been significant engagement. There has been no general information from EDDC or Parish Council regarding this consultation. The PC have advertised this only through Facebook massively limiting who might see this and therefore significantly limiting the numbers of parishioners participating in the consultation.

There has been no consistent approach with the Strategic Planning Committee ignoring Planning Officers' recommendation and suddenly 'u-turning'.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: robert and christine glanville

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2(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.: We do not feel that we are qualified to comment on the legal compliance of this part of the Development in the Towns and Villages chapter.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Whimble is a Tier 4 settlement, so the addition of 83 houses is at odds with the Local Plan directive to promote 'limited development to meet local needs'

Much of Whimble is in a critical drainage area where surface water needs to be managed to a higher standard than normal.

WH_08 was initially not recommended for allocation for any size of development by EDDC officers (2020 -2040 site selection report), but recently the East Devon Strategic Planning Committee chose to allocate contrary to officers recommendations. We are not sure on what basis there was a change of mind because the original reasons for not allocating have not altered.

1. Church Road lacks footways until its junction with Bramley Gardens (only two very small stretches of pavement exist on Church Road at the junction with Bramley Gardens, approx. 35 and 25 metres in length each). The lane to the north of the site is very narrow and lacks footways.
2. A narrow strip of land along the western site boundary is within flood zone 3. Grade 3 agricultural land.
3. The site is within a Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan.
4. There is an unconfirmed wildlife site (Gateshayes Farm Orchard) in part of the north of the site. This land also forms a core nature area (grassland). There are two small watercourses within the site. Significant moderate adverse effect predicted. The site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone.

The lane leading off the London Road (old A30) to Whimble village as far as the Thirsty Farmer Public House is at least a mile long. This is an extremely dangerous road for pedestrians, motorists and horses alike due to its narrowness (pinch points) and almost total lack of pavements and lighting. We are advised that Devon Highways have informed EDDC 'the road through the village being very narrow preventing the flow of two-way traffic in numerous places. The majority of the main road leading to and through the village having no pavements or adequate lighting. The lane to the north of the site is very narrow and lacks footways'. The building of the proposed quantities of houses would result in a totally unacceptable and dangerous increase in traffic on the village road due to the reasons already stated.

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.: Due to the issues

relating to the inadequate road through the village it is difficult to see how such a plan can be modified. Our suggestion would be to consider marginally increasing the currently proposed building of a new town at nearby Farringdon, where all the required infrastructure would be catered for and thereby provide a safe environment e.g suitable roads, pavements, lighting, schools, shops, GP Surgeries. This would alleviate the unrealistic demands for building in small villages in East Devon which, particularly in Whimple, provide very little of this type of infrastructure.

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.: We do not feel we are qualified to comment on the duty to co-operate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Vikki Godden

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to formally object to the proposed allocation of Whim_08a in the EDDC Emerging Local Plan. As a resident of Bramley Gardens (Hindcott, Bramley Gardens, Whimble, EX5 2SJ), I have serious concerns regarding the safety implications, environmental impact, and the flawed consultation process associated with this proposal. First and foremost, the site lacks safe pedestrian access to essential services in Whimble. Church Road has no pavements, making it an unsuitable and hazardous route for residents—particularly children and families—who need to reach the shop, school, or train station. This contradicts policies that prioritize sustainable and secure transport solutions. Additionally, the land falls within a designated Green Wedge, intended to prevent the merging of Cranbrook and Whimble. Development here would compromise the distinct identity of the village and violate the principles of Policy OL05, which seeks to protect local character and landscape integrity. Environmental concerns are also significant. The site is home to various unconfirmed wildlife species, including owls, bats, birds of prey, badgers, and deer. Furthermore, the flood risk in this area has not been adequately reassessed, despite previous recommendations for further investigation. The absence of up-to-date environmental and flood risk assessments means the plan lacks the necessary evidence to support this allocation. Equally troubling is the lack of transparency in the consultation process. At a public consultation event in Whimble, officers explicitly stated that this site was not under consideration. Its sudden inclusion in the plan, without proper explanation or community engagement, raises serious concerns about the integrity of the process. For these reasons, I strongly oppose the allocation of land next to Bramley Gardens (Whim_08a) for development.

Full name: Suzanne Hales

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: My next comment relates to work done by local parish councils to protect green wedges. We spent hours trying to protect Whimble and Rockbeare from joining up with Cranbrook. THE ORIGINAL LOCAL PLAN SAID IT WOULD PROTECT AND SUPPORT EXISTING VILLAGES. Now Whimble 08 site has been put forward for 50 houses. - Whimble Parish Council have sent an excellent response to this awful idea, please look at what they have written - again with local people's knowledge and comments in the minutes of their meetings. No proper consultation with residents in Whimble had been conducted. The wildlife in Whimble 08 is the last area for animals, birds and reptiles to be safe in- all the land before it is taken by housing. THIS SHOULD BE A DEFINITE GREEN WEDGE TO KEEP EXISTING ANCIENT COMMUNITIES SAFE FROM CRIMEBROOK. The land in this area is some of the best farm land in Devon for growing, Our children will ask us in the future why we don't have sustainable locally grown food because we let all the land be built on. Why Does East Devon need so much housing where is the evidence? I realise that housing needs to be provided but it's not good housing that has gone Up, it's not quality of life housing. None of it is in keeping with nearby communities. I have handed in my notice as a councillor because whatever we do or say is never listened to. Everything we commented on about Cranbrook has now come true. The developers rule and do what they want.

Full name: Suzanne Hales

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This was to be a protected green space to separate Cranbrooke from Whimble. Many local Parish councils spent hours working to protect green wedges between Whimble and Rockbeare from the sprawl of crimebrook . When do EDDC ever say no to numbers given by government, we have more than our fair share of new housing in East Devon. Beautiful farmland destroyed, where will all our future sustainable food come from . Sick of how you are allocating land.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This was to be a protected green space to separate Cranbrooke from Whimble. Many local Parish councils spent hours working to protect green wedges between Whimble and Rockbeare from the sprawl of crimebrook . When do EDDC ever say no to numbers given by government, we have more than our fair share of new housing in East Devon. Beautiful farmland destroyed, where will all our future sustainable food come from . Sick of how you are allocating land

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Not enough consultation with local communities. The original EDDC plan promised to protect local communities and villages.

Full name: Andrew Hardy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live at no. 8 Slewton Crescent and strongly object to the proposed development at Whimple_11 for all the reasons cited in the parish council's response, including drainage/flooding issues, unsuitable road access leading to increased traffic through the village and the need to preserve natural habitat.

Full name: Robert Hazell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to express my view and concerns and strong objection regarding the Strategic Allocation in Whimble of Whim_11 (land at Station Road) Whimble.

I support Whimble Parish Councils responses in full, further as a resident of Sleuton Crescent, number 27 I have first hand experience of Cranny Brook flooding on an increasingly regular basis, my house is immediately adjacent to Cranny Brook, it has broken it's bank on 10 occasions in the winter of 2024/25 the highest recorded in the 28 years I have been resident. Any development upstream which Whim_11 is can only increase the risk of flooding to mine and other properties.

Whim_11 is already subject in part to flooding as confirmed by the Environment Agency, development would increase risk of adding in a world where weather patterns are changing and increased flood risk is widely known and expected to make vulnerable areas more vulnerable.

My objection is on the grounds of soundness in that the allocation and policy is not based on solid evidence. The EDDC Strategic Planning Committee considered the Whimble Site Selection Report at a meeting on 1 October 2024. Professional planning officers identified and assesses the potential sites in Whimble and using their professional judgement, backed up with sound evidence recommended to Members whether to allocate the site or not. In the case of Whim_11, Planning Officers

recommended that the site be allocated for the following reason: ‘The site is considered to be the best option for accommodating an appropriate scale of development for Whimble. It is well related to the exiting settlement pattern and benefits from relatively good pedestrian access to facilities in the village centre. Although the northern part of the site is at risk of flooding, there is potential for the development of around 30 dwellings on the remainder of the site.’ Representatives from the Parish Council were not able to attend the Strategic Planning Committee on 1 October 2024, but instead submitted a statement, which was read out by a Democratic Services Officer. The Whim_11 site in Station Road (which is also known locally as the old cricket ground) has been put forward for development several times before when East Devon District Council (EDDC) have called for sites. In the 1995, 1999 and 2015 Local Plans the proposed site was rejected on several legitimate planning grounds and the site was not allocated in the Local Plan. The Parish Council asked the Strategic Planning Committee to give an explanation as to what has changed since this site was previously rejected that now makes it suitable for allocation. To date, no response has been received from EDDC.

Trees and Wildlife Habitat The site contains a number of mature trees several of which have existing Tree Preservation Orders (TPOs). The tree in middle of old cricket pitch is unique, mentioned in Wisden and should be preserved as of historic importance. In the EDDC Site Selection Report for Whimble, there does not appear to be any mention of the tree in the middle of the old cricket pitch and allocation on this site would surely be subject to the provision of EDDC Emerging Local Plan Policy PB08: Trees, Hedges and Woodland on development site. The DEFRA website shows the site and north east of site as Woodland Priority Habitat and Woodland Improvement Area, Priority Habitat (woodland and orchard), and a national habitat and network enhancement zone 1. Any development of this site would be contrary to the EDDC Emerging Local Plan Policies PB02: protection of regionally and locally important wildlife sites and PB03: protection of irreplaceable habitats and important features.

Flooding It is noted that the site is already subject to (partial) flooding (confirmed by the Environment Agency), and any development would run the risk of adding to this with impact both on the site and further downstream. There is no evidence to suggest that officers have carried out further work relating to the flood risk before consideration was given to a partial allocation. Therefore, Whimble Parish Council suggests that there is no sound evidence for allocating this site in the EDDC Emerging Local Plan and that it is contrary to Policy AR01: Flooding.

Access to the site and Infrastructure The exit from the site is on to a single track road with a blind corner – not only would this create an immediate local problem but the potential to add 33 houses on this site would seriously compromise an already congested and busy exit route from the village (continuing through the Centre of the village – along Church Road and then on to the old London Road. Church Road is the main route into the Village and is a narrow and dangerous road. The section of Church Road nearest to the Square and village shop is single track road with houses either side of the road. There is no pavement along the stretch of

Church Road to The Square and School Hill. The Parish Council and Villagers have raised concerns about the volume and speed of traffic on that road. The Parish Council are so concerned about the volume and speed of traffic along Church Road that it has convened a Community Speed Watch Group to monitor the traffic and speed along that road. There is no capacity to add a footpath to exit and continue from this site. All access routes are narrow country lanes, so development would exacerbate the existing problems of public safety (given the lack of footpath), traffic congestion and noise. This site was considered unsuitable for development in 1995 due to traffic issues. What has changed since then which now makes this site suitable? This question was asked to the EDDC Strategic Planning Committee meeting on 1 October 2024 but, to date, no response has been received. The Parish Council has been advised that the owners of the site do not own the hedge bordering the site. Also another local resident owns land adjacent to the site that would be needed for the installation of a footpath, and he has advised that he will resist any land grab. Whimble Parish Council feels that this site is not sustainable and therefore should not be allocated in the EDDC Emerging Local Plan.

Land of Local Importance In 1993 The EDDC Chief Engineer and Planning Officer wrote to a local resident to confirm that the Richard Whiteway Memorial Ground was inset as “Land of Local Importance” (copy of the letter has been provided). The letter states ‘the intention of the designation is that the land should not be built upon’, and ‘the designation means that the land can only be used for activities which retain its open nature. Any applications to develop the land would be resisted’. Whimble Parish Council asks what has changed since 1993 to suggest that this site should now be allocated in the Emerging Local Plan? This question was asked to the EDDC Strategic Planning Committee meeting on 1 October 2024 but, to date, no response has been received.

Developing this site would be contrary to Policy OL06: Land of Local Amenity Importance and Local Green Space. Spatial Strategy Whimble is a is a 'Tier 4' settlement, where the draft local plan seeks to promote limited development to meet local needs. The development of up to around 33 homes on Whim_11 is consistent with that strategy. Whimble Parish Council challenges this assumption. As part of the work on the Whimble Neighbourhood Plan, the Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states ‘The survey identified a need for at least 4 affordable homes within the next 5 years.’ Whimble Parish Council does not class a total allocation of 83 homes in Whimble to be ‘limited development’ (Whim_11 total of 33 homes; Whim_08a total of 50 homes), especially when the Whimble Housing Needs Report lists a significantly lower figure. The Parish Council also suggests that the allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01: Housing to address needs, which states ‘This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.’ In addition to this, there are developments planned in

neighbouring areas e.g. Cranbrook. This includes the current Cobdens Expansion of Cranbrook, part of which is still in the Whimble Parish Area, where 1500 houses, a school and a travellers site have already been approved by the Strategic Planning Committee. These sites have a far better infrastructure than Whimble Village so why has the additional housing requirement not been allocated at these sites? Other Comments The Parish Council and local residents in Whimble have not said that they are against development. But the issue is the size and location of the development. It is the view of the Parish Council that development would be better placed elsewhere in Whimble, or in Cranbrook or elsewhere in the district where there is appropriate infrastructure. As set out earlier there is no sound justification as to why the Strategic Planning Committee decided to go against the professional judgement of the Planning Officers and allocated this site in the Emerging Local Plan. Also, in terms of soundness, the Strategic Planning Committee does not appear to have fully considered a number of other options that could have been chosen. Whimble Parish Council is looking at Site Allocations as part of the evidence base for its Neighbourhood Plan. The Parish Council is considering a number of sites, which are: Whim_03 Land to the south of Grove Road Whim_07 Land south of Broadclyst Road Whim_13 Land north side of Grove Road Whim_18 Land to the east of Church Road Whim_20 Land to the north of Plumtree Lane The Parish Council's preference would be that a site is allocated to the east of Church Road so that it is nearer to the established infrastructure near the Hand and Pen. It is the view of the Parish Council that further work should be carried out on all of the sites by the professional Planning Officers before any allocation is made in Whimble. Summary Whimble Parish Council believes that policy SD29: Strategic Allocations for Whimble, specifically site Whim_11 is not sound, as the decision to allocate failed to consider the protected tree in the middle of the site, which is protected by a Tree Preservation Order (TPO). Also, there is no mention of the fact that previously the EDDC Planning Department designated this site as "Land of Local Importance" which should not be built on and should be used for activities which retain its open nature. Therefore, Whimble Parish Council and local residents want to see the modification of site Whim_11 being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the district (outside of Whimble Village), where there is appropriate infrastructure.

Full name: Terence David Hill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As a Whimple resident I strongly object to the plan to develop Whim08 for 50 houses and a 'community orchard/open area'.

This plan was rejected unanimously in whole or in part at a Strategic Planning Meeting in October 2024 in accordance with Planning Officer recommendations and yet a month later the same committee unanimously voted for the proposal that was proposed by the Chair of said committee who lives in Whimple.

A speaker justified the proposal with comments regarding the facilities available in the village including:- a Post Office (there is not one!) a school (now full due to overspill from Cranbrook and already using a village hall as an overflow that should be for the use of all residents resulting in the community having to raise £400,000 to extend the hall to make it available for all) a shop (up for sale and no guarantee that it will continue) a Railway Station with good services (not a good service and no parking available already in this area) and all of these facilities are isolated from Whim08 by a narrow often single track Church Road that is poorly lit with no pavements. There is no suitable bus service from Whimple to anywhere.

It was also stated in the November Strategic Committee meeting that once the 50 houses are built there could be more development of the site on the other side of the flood plain towards Cranbrook so clearly this proposal is just a lever to over develop a small village and join it up to Cranbrook on what is a Green Wedge.

One aspect that has been thrown in without any apparant discussion or consideration is that attached to this development could be a community orchard/open area. It is not clear what use this would be put to but would border an existing historic orchard that continues around the back of Bramley Gardens and is a haven for wildlife. This area could not survive as such if an open area were developed next to it as inevitably children would use this orchard as an extension of the 'open area' and if that becomes used as a play area and dog walking area it is inevitable that Bramley Gardens could become a parking area for these activities for those coming from other parts of the village rather than the Whim08 development.

If EDDC are short on their needs then surely other areas of Whimble Parish should be considered nearer to Hand & Pen where there is a good bus route and is close to local facilities at Cranbrook.

The Parish Council have identified that 5 affordable houses would be needed in the near future and yet 15 would be included in the 50 house allocation for Whim08.

In conclusion this proposal has not been given adequate diligence, goes against Planning Officers recommendations, is not a suitable , safe site and seems to be a kneejerk reaction to Government prssure to meet targets regardless of the practical issues that exist.

Full name: Sue Hill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live in Whimble and I object to the plan to develop Whim08 for 50 houses and a 'community orchard/open area'.

This plan was rejected unanimously in whole or in part at a Strategic Planning Meeting in October 2024 in accordance with Planning Officer recommendations and yet a month later the same committee unanimously voted for the proposal that was proposed by the Chair of said committee who lives in Whimble.

A speaker at the November meeting justified the proposal with comments regarding the facilities available in the village compared to Feniton including:- a Post Office (there is not one!) a school (now full due to overspill from Cranbrook and already using a village hall as an overflow that should be for the use of all residents resulting in the community having to raise £400,000 to extend the hall to make it available for all) a shop (up for sale and no guarantee that it will continue) a Railway Station with good services (not a good service and limited parking available) and all of these facilities are isolated from Whim08 by a narrow often single track Church Road that is poorly lit with no pavements unlike the area around Feniton Railway Station that has wide roads, pavements and decent station parking. There is no suitable bus service from Whimble to anywhere.

It was also stated in the November Strategic Committee meeting that once the 50 houses are built there could be more development of the site on the other side of the flood plain towards Cranbrook so clearly this proposal is just a lever to over develop a small village and join it up to Cranbrook on what is a Green Wedge.

One aspect that has been thrown in without any apparant discussion or consideration is that attached to this development could be a community orchard/open area. It is not clear what use this would be put to but would border an existing historic orchard that continues around the back of Bramley Gardens and is a haven for wildlife. This area could not survive as such if an open area were developed next to it as inevitably children would use this orchard as an extension of the 'open area' and if that becomes used as a play area and dog walking area it is inevitable that Bramley Gardens could become a parking area for these activities for those coming from other parts of the village rather than the Whim08 development.

If EDDC are short on their needs then surely other areas of Whimble Parish should be considered nearer to Hand & Pen where there is a good bus route and is close to local facilities at Cranbrook.

The Parish Council have identified that 5 affordable houses would be needed in the near future and yet 15 would be included in the 50 house allocation for Whim08.

In conclusion this proposal has not been given adequate diligence, goes against Planning Officers recommendations, is not a suitable , safe site and seems to be a kneejerk reaction to Government pressure to meet targets regardless of the practical issues that exist.

Full name: Terence David Hill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Whim08a is not suitable for development because

1. the entrance via Bramley Gardens off Church Road is totally unsuitable as an access to further development as it enters Church Road on a blind bend.

2. The development would be served by a village but would be isolated from the village amenities by a narrow Church Road with no pavements and no street lights.

3. Access to the village from Hand and Pen is a winding narrow lane with some single track elements that are already dangerous for existing village residents.

4. The provision of turning an existing traditional orchard to the north of the development into a community orchard with open space for the use of the new development would seem to not only destroy the idea of retaining a traditional orchard but would surround an existing development of mainly retirement bungalows in Bramley Gardens with open spaces no doubt used for children's play areas and dog walking resulting in noise plus Bramley Gardens being used a parking area as there is currently an access to the orchard between 11 and 12 Bramley Gardens.

4.

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.: Keep the area currently designated as traditional orchard as such and not turn it into an open space

for community use. Develop open space elsewhere around the new development. Change the access to the WHIM08a development along Church Road nearer to Hand and Pen and seal off the road access from Bramley Gardens leaving only pedestrian access from Bramley Gardens to the new development. To enable residents to access decent bus services Church Road from Bramley gardens to Hand and Pen needs a footpath as a full bus service only runs from Hand and Pen. Following a Community Speed Watch initiative just commencing the Highways Dept needs to reduce speed limit to 30mph until it meets the 20mph limit just past Bramley Gardens and to improve signage to encourage priority to one direction of traffic in the village where it is single track. This village has a major accident waiting to happen and further development will make this situation even worse.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The villagers have already demonstrated their desire to avoid such development in previous consultations. The proposal to develop WHIM08a and take over an historic orchard was hastily decided with a throw away line at a Strategic Planning Committee meeting without any discussion about the difficulties of this idea and with statements made by Councillors about the facilities in the village being incorrect and misleading i.e There is no Post Office in the village, there is not a 20mph limit at the junction of Church Road and Bramley Gardens, the proposed development would be isolated from the village by narrow roads with no footpath and no street lights. The decision appears to be riding roughshod over practical issues and the wishes of a lot of villagers.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ian Holten

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live at no. 28 Slewton Crescent and strongly object to the proposed development at Whimple_11 for all the reasons cited in the parish council's response, including drainage/flooding issues, unsuitable road access leading to increased traffic through the village and the need to preserve natural habitat.

Full name: Margaret Holway

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I write to strongly object about the 2 proposed developments in Whimble: Whiteways Cricket Pitch Bramley Gardens

The village cannot sustain any more housing. There is no parking ,no capacity for schools/GPs/Dentist/Hospitals. The Bramleys Garden area forms part of the green wedge between Whimble and Cranbrook so cannot be usedv as per previous agreeemnts. The roads are chock a block now and there is no parking. The Whiteway Cricket Pitch will mean at least an extra 60 cars .

Whimble needs green spaces not more houses.

Full name: Margaret Holway

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: With regards to the planning on Whiteways old cricket pitch. To put 33 houses there is creating a major vehicle problem for the village, It will be at least 50 to 60 cars using our village lanes and creating even worse traffic jams than we have now. Also re Bramley gardens...we need some green spaces in Whimple,I believe Cranbrook was developed to keep our villages as villages! Bramley garden side of the village is the green wedge between us and Cranbrook There is not enough parking here now Whimple centre is full to capacity.

Full name: Rob Giffard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This part of the development plan is in direct violation of the rejection of building on these sites as agreed on 1st October 2024 by the EDDC Strategic Planning Committee which followed professional planning officers' advice that the location was unsuitable for housing development.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of land Whim_08a for development is not sound for several important reasons:

Conflict with Green Wedge Protection: The site is located within a designated Green Wedge, which is protected under the EDDC Emerging Local Plan Policy OL05. This policy states that development should not proceed in Green Wedges if it "damages the individual character or identity of a settlement or could lead to or encourage settlement coalescence." Developing on Whim_08a would violate this policy in two key ways. First, the proximity to the Cobdens development increases the likelihood of coalescence with Cranbrook. Second, this would erode the distinct identity of Whimble, particularly the Bramley Gardens area, and contribute to the suburban sprawl extending eastward from Exeter.

Incompatibility with Spatial Strategy: According to the EDDC Site Allocation Report, Whimble is a "Tier 4" settlement, where the draft local plan seeks to promote limited development to address local needs. A recent Housing Needs Survey commissioned by

Whimble Parish Council identified a need for only 4 affordable homes in the next 5 years. The proposed developments on Whim_08a, either alone or combined with Whim_11, significantly exceed this local need. Additionally, the ongoing Cobdens development, which includes 1,500 homes within Whimble Parish, already meets and surpasses the need for affordable housing in the village.

Lack of Safe Pedestrian Access: Access to the site would be via Church Road, which is narrow and heavily congested, particularly during peak times such as the school run (9am and 3:30pm). The police have confirmed that Church Road is not a safe route to essential village amenities such as the primary school, village shop, church, or train station. Additional development would exacerbate this safety hazard.

Contradiction of Planning Officers' Recommendations: In earlier consultations, planning officers deemed this site unsuitable for development, even in part. However, the Strategic Planning Committee has ignored these recommendations without providing any clear justification. This decision undermines the soundness of the allocation.

Flooding Risk: The site is at risk of flooding, which raises significant concerns regarding the safety and sustainability of any proposed development.

Impact on Wildlife: The development of Whim_08a could have detrimental effects on local wildlife, conflicting with EDDC Emerging Local Plan Policy PB03, which aims to protect irreplaceable habitats and important natural features.

For these reasons, the allocation of Whim_08a for development is fundamentally unsound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Whim_08a from the list of allocated sites, as no development should be permitted there. Development on Whim_11 should be restricted to just 4 dwellings to meet the locally identified housing need.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This development does not meet the duty to co-operate. The National Planning Policy Framework (NPPF) has not been followed, as effective cooperation has not been maintained. Section 3, paragraph 24 of the NPPF states that strategic authorities must engage with local communities and relevant bodies NPPF, Paragraph 24. However, there has been minimal outreach. The Parish Council only advertised the consultation on Facebook, which limited its visibility and participation.

Additionally, the Localism Act 2011 requires that local communities are properly consulted on planning matters Localism Act 2011, Section 122. The Strategic Planning Committee ignored Planning Officers' recommendations and made an abrupt decision without explanation, undermining the consultation process.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Matthew Harris

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(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.: N/A

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.: N/A

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: N/A

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: I don't believe it is sound to develop here.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

From a personal viewpoint of a Whimple resident living nearby to the site at Bramley Gardens in particular, I'm not wholly against development but considering the current infrastructure here it would be completely irresponsible. I believe the main issue to be access, the existing roads cannot handle/are not sufficient for current traffic volumes as it is. It is a very narrow, single track lane with no pavements or safe way of pedestrian access. I live close by and walk my 2 year old to the school, it is frankly quite scary and dangerous to life as it is. Adding more volume to this already inappropriate infrastructure would be grossly irresponsible and I can only conclude would be decided

by individuals who have never attended the site. If pedestrian and vehicle access were MUCH improved through the center (down church road), only then perhaps it could be considered.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: These proposed developments in policy SD29 (especially Bramley Gardens), can only possibly be considered sound if the existing access and in particular the pedestrian access is vastly improved on the main road (lane) through the village.

It always shocks me how anyone can possibly expect to build and build and build without ever improving existing infrastructure/access that's ancient. It doesn't take much brain power at all to realize that eventually that will pop and the road will be permanently clogged up with pedestrians forced to jump into hedges. Please please do not build here without improving this lane first, all you need to do is walk down this lane at rush hour yourself to actually realize this. Thank you.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As mentioned in 3(c), it totally fails anyone living here to build more houses when there is absolutely zero safe pedestrian access.

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.: N/A

Full name: Maureen James

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Re: Objection to SD29 Strategic Allocations in Whimble particularly Whim_08a

I would like to make my objections to the above proposal.

Professional planning officers have already assessed potential sites in Whimble and recommended that the site was not allocation for a variety of reasons, including being incompatible with spatial strategy and forming part of the green wedge with Cranbrook. The objection is supported by the Parish Council.

The road network around Whimble provides huge challenges as every access is narrow and does not have safe pedestrian access. Any large development within Whimble will cause major issues in terms of access of contractors to any site.

Safe pedestrian access is already a concern within the village, with a rising number of vehicles passing through the village and no pavements with no potential to provide safe access. Due to the narrow access in the Square and through the centre pedestrians have to walk on the road as there are no pavements. Therefore access to the school is likely to be by vehicle.

Transport links are not particularly good; although there is a train service only alternate trains stop at this station and the bus service is limited and ceases at 6pm and does not operate on Sundays.

Wildlife: There is an abundance of wildlife in Bramley Gardens and on the proposed site including woodpeckers, newts, owls, deer, badgers and bats which are regularly seen flying around this area. This would therefore be contrary to policies with regard to protection of irreplaceable habitats for wildlife.

Flooding: The centre of Whimple regularly floods and this proposed development is likely to increase the severity and frequency due to the run off down into the centre of the village. I would like to see evidence of flood risk assessments.

In my opinion Whimple is unsuitable for further large scale development due to the access issues and unless a new access road is constructed into the village from the old London Road providing two lane road with a cycle lane and pavement.

Full name: Peter Johnson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

1. I live in Millend directly opposite the proposed building site. Access to the site would bring all construction traffic through whimple a village with NO Footpaths.

2. No footpaths exist from the proposed site to the school or Whimple facilities.

3. The site is accessed from a single track lane, two vehicles can't pass each other as witnessed by the recent accident of the local Sidmouth bus trying to pass a stationary lorry, showering its current customers in glass shards.

4. Yes it has been noted that field floods, no one has noted that the single track lane also floods, current drainage is insufficient in the lane, more houses and tarmac won't help cure this

5. Site wh_04 already has access and footpaths into Bramley gardens and is the right side of the village to stop any construction traffic increasing the likelihood of pedestrian injury.

Full name: Tim Jones

Other party name (if relevant): Hindcott

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to object to the allocation of Whim_08a in the EDDC Emerging Local Plan. This proposal is unsound due to safety concerns, environmental risks, and a failure of proper consultation and evidence.

The site lacks safe and convenient pedestrian access to key services in Whimple. There are no pavements on Church Road, and it is unsuitable for walking to the shop, school or station—especially for children and families. This makes the allocation contrary to policies encouraging sustainable and safe transport. The land is also part of a Green Wedge, designated to prevent coalescence between Cranbrook and Whimple. Development here would contribute to settlement merging and undermine the character of the village. This breaches the principles of Policy OL05 and has long-term implications for landscape and community identity.

Additionally, there are unconfirmed wildlife habitats on this land, including owls, bats, birds of prey, badgers and deer. These issues have not been fully assessed, nor has the site's flood risk, which officers previously said required more work. The lack of updated assessments makes the plan unsound, as it is not supported by proportionate evidence.

Importantly, at a public consultation event in Whimple, officers stated that this site was not under consideration. For it to appear later in the plan, without proper communication or justification, undermines the integrity and transparency of the consultation process.

It is on this basis, I strongly object to the plan to allocate land next to Bramley Gardens for development (Whim_08a)

Full name: Gareth Jones

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Procedural Errors: I believe that due process was not followed by the EDDC Strategic Planning authority by failing to follow proper procedures when they re-assessed the sites for Whimble at the EDDC Strategic Planning Committee on 1 November 2024.

Substantive Errors: I believe that the assessment of the planning proposal has failed to correctly consider the guidance provided by the planning officers' that the majority of sites including Whim_08 were unsuitable due to:

· Scale of development incompatible with spatial strategy. · Site lacks safe and convenient pedestrian access to services and facilities in the village. · The site forms part of the 'Green Wedge' between Whimble and Cranbrook. · Forms an important part of the very attractive rural landscape setting for the settlement. · Potential impact on wildlife · Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation.

No additional assessments were carried out to support the allocation, raising serious concerns about the decision.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I do not believe that the process to arrive at the required number of houses for Whimble as

outlined in Strategic Policy SD29: Development allocations at Whimble is a sound and just recommendation.

The objection is on the grounds of soundness in that the allocation in the policy is not based on solid evidence. The EDDC Strategic Planning Committee considered the Whimble Site Selection Report at a meeting on 1 October 2024. Planning officers identified and assessed the potential sites in Whimble and using their professional judgement, backed up with sound evidence recommended to Members whether to allocate the site or not. In the case of Whim_08 site, officers recommended that the site was not allocated for the following reasons: · Scale of development incompatible with spatial strategy. · Site lacks safe and convenient pedestrian access to services and facilities in the village. · The site forms part of the ‘Green Wedge’ between Whimble and Cranbrook. · Forms an important part of the very attractive rural landscape setting for the settlement. · Potential impact on unconfirmed wildlife site. · Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to an allocation.

Members of the committee voted to go with the recommendation and not allocate the site. However, at the Strategic Planning Committee meeting on 1 November 2024 Members allocated part of the site, contrary to Officer recommendation without justification or additional work appearing to have been completed by officers to assess the risks relating to this site before allocating it.

Scale of development incompatible with spatial strategy. Policy SP01: Spatial Strategy section E states ‘Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.’ The EDDC Site Allocation Report for Whimble states ‘Whimble is a ‘Tier 4’ settlement, where the draft local plan seeks to promote limited development to meet local needs. The development of up to 83 dwellings for Whimble is excessive in relation to the scale of the existing village and is not at the density of existing housing in the settlement boundary.

The allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01: Housing to address needs, which states ‘This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.’ There are developments planned in neighbouring areas e.g. Cranbrook. This includes the current Cobdens Expansion of Cranbrook, part of which is still in the Whimble Parish Area, where 1500 houses, a school and a travellers site have already been approved by the Strategic Planning Committee. These sites have a far better infrastructure than Whimble Village so why is the additional housing requirement not allocated at these sites?

The site forms part of the ‘Green Wedge’ between Whimble and Cranbrook. The EDDC Emerging Local Plan Policy OL05: Green Wedges states ‘Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.’ The Allocation of this site would potentially damage the individual character or identity of Whimble. This site forms an important part of the rural landscape setting for the settlement. This would also lead to settlement coalescence between Whimble and Cranbrook, which is a material planning issue, and clearly demonstrates that this site should not be allocated in the Local Plan. This was the view of the EDDC Planning Officers. Potential impact on unconfirmed wildlife site. Residents of Whimble have stated that this site is a wildlife site which is home to bats, owls, woodpeckers, deer and badgers. Any development of this site would be contrary to EDDC Emerging Local Plan Policy PB03: protection of irreplaceable habitats and important features. Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation. There is no evidence to suggest that officers have carried out further work relating to the flood risk before consideration was given to a partial allocation. Summary Whimble Parish Council believes that Policy SD29: Strategic Allocations for Whimble, specifically site Whim_08a is not sound, as the decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made to

partially allocate the site. Therefore, Whimble Parish Council and local residents want to see the modification of site Whim_08a being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the district, where there is appropriate infrastructure.

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.: Reduction of the allocation for Whimble to 33 houses at (Whim_11).

Full name: B and CA Lambert

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As residents of Church Street for 42 years, we write to object to the scale of development planned as it is incompatible with spatial strategy. We have had our front wall knocked on numerous occasions by vehicles (both large and small) and find it difficult to walk to the square and beyond owing to the traffic not obeying the 'give way' priority signs and there is no pavement. It is dangerous for children walking to the primary school, as well as elderly people. The proposed site forms part of the 'green wedge' between Whimble and Cranbrook and would destroy the individual character and identity of this old cider village. The green wedge is home to wildlife and any development of this area would be contrary to EDDC emerging local plan policy PB03: Protection of irreplaceable habitats and important features. Has there been any flooding assessment done?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We would therefore like to see the modification of site Whim_08 being removed from the EDDC emerging local plan and the houses being allocated elsewhere, outside of Whimble where there is appropriate infrastructure.

Full name: Alison Large

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Plans for development of the 2 sites in Whimble need to take into consideration the capacity that Whimble has for 80+ homes which will have 1, possibly 2, cars each. The housing plans MUST include space for residents vehicles. Transport considerations for traffic through the village needs to be thought of as access through the narrow streets is already an issue and causes problems, including damage to property and trucks getting stuck under the railway bridge.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Guy Lawrence

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal for 50 dwellings on land west of Bromley Gardens (Whim_08a) is out of proportion with the size of the village, especially as 33 new homes are already earmarked at Station Road. It is situated on land previously allocated as a green wedge between Whimble and Cranbrook, as such the proposal would erode protection against encroachment on the village. In addition, Church Road, which provides access to Bramley Gardens is a busy, narrow lane without pavement. Additional traffic associated with this development will lead increase the danger to pedestrians.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to the original proposal to only develop the land at Station Road (keeping that to 33 dwellings). Failing that, significantly decrease the number of homes to no more than 12.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mr & Mrs Ley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I write to object to the allocation of Whim_08 (land west of Bramley Gardens on the 1st November 2024 in the EDDC Emerging Local Plan.

I object on the basis of soundness. On 1st October 2024, just 30 days earlier, the EDDC Strategic Planning Committee rejected the Whim_08 site on the basis of:

* Scale of development incompatible with spatial strategy * Site lacks safe and convenient pedestrian access to services and facilities in the village * The site forms part of the 'Green Wedge' between Whimble and Cranbrook * Forms an important part of the very attractive rural landscape setting for the settlement * Potential impact on unconfirmed wildlife * Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation.

To our knowledge, none of these issues have been addressed.

As a resident of Church Road below Bramley Gardens, I can confirm that the site lacks safe pedestrian access to services and facilities in the village. With an additional 50 houses with potentially in excess of 100 pedestrians and a further 50 vehicles (at least), the pedestrian route to the village would be even more hazardous.

Residents of Church Road can already testify to the fact that the road is far too busy for a single track village road, with a constant stream of traffic driving past our homes.

The section between Bramley Gardens and the shop in the square is in many places single track with no pavement and cars are regularly stationary in the road waiting for a stream of traffic to pass before they can proceed. This leads to increased pollution to the village and even less space for pedestrians to walk safely to the facilities in the village.

In addition, the village is already struggling with drainage issues with the potential for flooding. Our own garden after just one day of rain becomes saturated and water logged with visible surface water which takes days to clear. With another estate of 50 homes, the run off could easily induce flooding to existing properties further down the hill.

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.: Given the above list of ongoing and serious issues with the Whim_08 site we believe the decision to allocate 50 homes on this site should be reversed.

Full name: jayne lindsey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live at Slewton Crescent, Whimble and strongly object to the proposed development at Whimble_11 for all the reasons cited in the parish councils response, including unsuitable road access leading to increased traffic through the village, the need to preserve natural habitat and especially the problem of drainage and flooding. This winter saw significant flooding of the stream running alongside Slewton crescent despite the banks having been reinforced in recent years- the first time this has occurred since before this work was undertaken.

Full name: Branco Love

Other party name (if relevant): Jenny Love

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Whim_08a- This paragraph contradicts the previous agreed plans as to the extent of the 'Green Wedge' to prevent coalescence and keep Whimble distinct from adjoining settlements. The scale of the development in relation to the size of the village is inappropriate.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I'm not legally trained, I don't understand what you mean. However, deleting this paragraph would, I believe, resolve the situation. In other words, no 50 house, etc.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

The impact on the village has not been assessed. The School is at capacity, and were it not for the trustees of the Victory Hall allowing their premises to be used for lunches,

lessons and other activities, it wouldn't be able to function. The availability of train travel is often stated. However, since Cranbrook station became operational, the hourly service previously enjoyed has been reduced to a two hourly service, at best.

3(b). If no, please give details 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 impact on the village has not been assessed. The School is at capacity, and were it not for the trustees of the Victory Hall allowing their premises to be used for lunches, lessons and other activities, it wouldn't be able to function. The availability of train travel is often stated. However, since Cranbrook station became operational, the hourly service previously enjoyed has been reduced to a two hourly service, at best. There is no viable bus service in the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Delete this Paragraph

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Co-operate with whom? What duty? Who has mandated this? This format is completely unfriendly to lay people who are trying to make comments

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jenny Love

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Policy SD29: Strategic Allocations for Whimble Site WHIM 08a I have tried to submit my response via the portal but found it very difficult to navigate, the language impossible to understand and therefore only suitable for legal professionals to use. It is not 'user friendly' for the general public, is quite discriminatory and results in fewer responses being made. No response being taken as affirmative! Not being legally trained, I do not fully understand the term LEGALLY COMPLIANT or what is needed to make the proposal compliant. Or what is needed to make it SOUND. I am therefore making my response by email! My response to the proposal. On October 1st 2024, the EDDC Strategic Planning Committee rejected the site following advice given by professional PLANNING OFFICERS. WHIM08a was deemed unsuitable due to: INCOMPATIBILITY with the special strategy, LACK OF SAFE PEDESTRIAN ACCESS throughout the village. IMPACT ON RURAL LANDSCAPE & WILDLIFE. FLOOD RISK REQUIRING FURTHER ASSESSMENT and most importantly, the site has GREEN WEDGE STATUS to prevent coalescence with CRANBROOK. The site allocation report also considers whether a smaller part could be allocated. The PLANNING OFFICERS view was 'NO'. However, on November 1st 2024, the District Councillor, Todd Olive, suddenly reversed the decision. This was against the original evidence and without any further investigation/assessment, discussion or justification. Making this decision UNSOUND and raising concern. I question the SOUNDNESS of the proposal for the reasons below and oppose the proposal to develop WHIM 08a. The EDDC Site Allocation Report for Whimble states that development should reflect local needs. The Whimble Parish Housing Needs Report states 'The survey identified a need for 4 affordable homes within the next 5 years! Whim 08 is considered to be excessively high in relation to the rest of the village. A total of 83 homes (Whim 08a and Whim11) is not a small development! This is way too many for a small village which has already seen substantial development. Smaller developments that 'blend in' with existing homes/architecture are more appealing and reflect the rural community. The Parish Council suggests the allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01.

Cranbrook is delivering thousands of new homes in the area. There is capacity for more homes to the North of this settlement with direct access to schools, shops and railway station. The current Cobdens Expansion is set to deliver 1500 homes, a school and a Travellers site. THIS SITE IS WITHIN THE WHIMPLE PARISH. Whimble is providing a sufficient number of homes in a location that will provide the required infrastructure. The infrastructure of the small village of Whimble is already inadequate. New development should be built in a more suitable location, along with the required infrastructure and easy access to existing facilities. Whimble School is already full to capacity, relying on the daily use of The Victory Hall to provide the necessary education and well being of the pupils. This means that the rest of the local community are not able use the hall's facilities. New homes bring children with them! Through traffic has increased considerably over the past 20 years. Delivering and collecting children to and from school is dangerous and difficult. There is no availability to park safely! Bottlenecks occur frequently. More homes bring more cars into the area at least two per home! Pavements through the village are non-existent and traffic speeds through the narrow lanes at dangerous levels. The road out of Whimble near WHIM 08a, does not have a pavement for residents who need to walk to the Hand and Pen to catch a bus into Exeter. The lane twists and turns making it dangerous for pedestrians. Whimble is an agricultural village. Traffic includes large farm vehicles moving between farms. Home delivery vehicles have also added to the congestion and high numbers. Although there is currently a small shop, this is now for sale and Whimble stands to lose this amenity. The Surgery is an off shoot of the Coleridge Medical Centre in Ottery St Mary, and therefore caters for patients in the wider community. The train service has declined considerably since the station at Cranbrook opened. Many trains ceased stopping at Whimble- there is only one line and speed is lost if a train stops. Putting the schedule out! The public bus service through the village is very infrequent and not sufficient for people working in Exeter ,as the bus travels through narrow lanes, small villages and on to Sidmouth. Village residents are forced to use their own vehicles which are bad ecologically and environmentally. Being dangerous for pedestrians and cyclists. WHIM 08a is surrounded by beautiful fields, hedgerows, orchards and woodland, which provide a wide range of habitat for wildlife, including bats and owls. We are constantly being told that the natural world is fundamental to our health and wellbeing. I feel that none of these things are taken into account and quick decisions are short sighted. WHIM 08a is prime agricultural land and is currently used as such. As well as having GREEN WEDGE STATUS preventing coalescence between Whimble and Cranbrook. Development would have a detrimental visual impact upon entering the village, increase light and noise pollution and have a great impact on the immediate surroundings. Flooding and sewerage is also a concern. Drainage trenches and pipes have recently been laid by the farmer to alleviate flooding issues. Investigations and assessments by the planners have been lacking. All of the above points challenge the SOUNDNESS of the proposal. I believe the proposal to develop WHIM08a,has been put

forward without careful consideration, lack of transparency, and lack of co-operation and communication with the residents of Whimple.

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.: NON-COMPLIANT and lacking in DUTY TO CO-OPERATE.

Webarchive.nationalarchives.gov.uk PLANMAKING No 16 C) Plans should be shaped early, be proportionate and have effective engagement between PLANMAKERS and COMMUNITIES, LOCAL ORGANISATIONS, BUSINESSES, INFRASTRUCTURE PROVIDERS and OPERATORS and STRATEGIC CONSULTEES. E) Be accessible through use of digital tools to assist public involvement of policy presentation. EXAMINING PLANS A) Does it address the areas assessed needs? B) Is it justified by having looked at reasonable alternatives?

There has been insufficient information about this proposal. Many residents appear to be unaware of it. Especially those who do not use the latest technology for communication,

Site WHIM 11 33 homes on this site is above the number quoted in the needs report for Whimple. This being 4! All of the reasons stated for opposition to development of WHIM 8a are also applicable to WHIM 11. These developments would have a detrimental impact on the village and all who live here.

Full name: Polly Luscombe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

agree with allocation of Whim_11. 30 homes in this location seems proportion to the village needs and growth provided that the site is designed sensitively to protect the irreplaceable and important habitats it supports.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land west of Bramley Gardens Whim 08a should not be allocated for 50 homes. An additional 50 homes beyond the 30 at Whim_11 is disproportionate and unnecessary in the context of Whimble's housing requirements. The site is located within the allocated green wedge and should remain undeveloped to protect and maintain Whimble's village status and feel in the context of Cranbrook which is proposed to encroach further east. The site does not provide safe transport/pedestrian links for this number of homes through the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of Whim_08a or significant reduction in number of homes proposed there

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Angus MacDonald

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Road access through the village is already extremely challenging with narrow slow lanes. Speeding has already been an issue and parking is already another problem. The addition of such a number of new homes will have an adverse effect on the existing community.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Better road access in to and through the village. Consideration if the capacity of the existing pre-school and school.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

Consultation seems to be online nowadays, it is disappointing that there does not seem to be in person consultation being held in person with communities to discuss planning/development proposals. During such a meeting it would be beneficial to ensure the community concerns are captured and issues addressed or mitigations presented by planning team.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Gill Mallett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to comment on the above plan, being a long time resident of Whimble {60 years}, and being situated off Church Road midway between Bramley Gardens and the village square.

Understanding that this plan is still being considered despite originally being rejected, following professional planning officers' advice, and agreeing with their concerns over the incompatibility with the promised green wedge status, bearing in mind the proposal for expanding Cranbrook into whimble boundaries already, the impact to wildlife, to which i can personally attest to sightings of deer, owls and woodpeckers on the land surrounding Bramley Gardens, and the flood risk, my main concern is with the lack of pedestrian access not only to the site itself, but also to the village facilities.

On a daily basis i walk along Church Road in both directions, to the Square and also past Bramley Gardens. Much of this route is single track road with very few, if any short stretches of pavement, all of which necessitate stepping out into traffic, often with very limited visibility. Along the vast majority of this road there is no pavement and in many circumstances i will have to dive into driveways, or flatten myself against hedges or cottage walls in order to allow vehicles to pass safely, particularly in the case of lorries, vans and the bus or when cars are trying to pass one another in narrow stretches. Collecting my grandchild from the preschool, situated in the village hall, and walking her home to my house is particularly hazardous and stressful.

In order to make use of any of the village facilities {the shop, the church, the school or preschool, the village hall, the Doctors surgery, train station or bus stop or even the

pub], this is the journey i must make and will be the journey the inhabitants of this proposed development will also have to take.

Obviously it is precarious to say the least and with, no doubt, the addition of yet more vehicles using this narrow stretch of road, the situation can only get worse.

Put simply the village has not the infrastructure to cope with an influx of more inhabitants so close to the heart of the village, be they pedestrians or vehicle users.

Thank you for your time in considering my concerns.

Full name: Michael Mallett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic Policy: SD29: Development allocations at Whimble. Land at Station Road (Whim_11) (Correction: Talaton Road)

Development proposals should deliver a footway extension from the west and tie into the site?

Site 11 Whimble Richard Whiteway Memorial Ground Talaton Road I implore you to reject the recommendation of RWMG as it should already have been removed. This field was subject to a 425 signature petition in 1988 to preserve unchanged as submitted to EDDC. (i.e Open Space which we sadly lack). In fact the ashes of two cricket supporters have been scattered. The field is home to owls, woodpeckers, nesting buzzards and foraging bats. There are a TPOs on several trees including those against the Talaton Road. The road is only 4.5 metres wide forcing cars into drive ways and viability is dire. It appears that it is intended to take part of my garden for a footpath which is not negotiable and I have never even been extended the courtesy of being consulted. The area has been granted “Land of Local Landscape Importance” by EDDC. Also I have correspondence from EDDC stating “Permission will not be granted for development on these areas except for recreational uses which retain the open character of the area”. Where are an estimated 50 extra cars going to be parked? Dangers of increased vehicles passing the primary school, the square and Church Road should be seriously considered. Exiting Station Road is already an accident waiting to happen without approximately 100 additional vehicle passing movements. Devon County Council refused an application for access by occasional LPG vehicles on highway grounds. (Letter 19 June 1995 attached) Flooding to The Green and then Clyst Honiton and Clyst St Mary should be considered. Whimble already suffers from sewage overflows without

additional housing. Please see attached letters. The Richard Whiteway Memorial Ground (Slewton) must be declared as Open Space to be enjoyed by all.

Full name: Abi Mewse

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site conflicts with Local Plan policies and lacks evidence of sustainability

I strongly object to the inclusion of site Whim_08a in the Local Plan on grounds of soundness. This allocation fails several tests of sound planning and contradicts numerous Local Plan policies.

The site is part of the Green Wedge between Whimble and Cranbrook. According to Policy OL05, development should not be permitted where it risks settlement coalescence or damages the rural character of the landscape. Allocating this site will contribute to the erosion of Whimble's individual identity and breaches the intent of this policy.

Furthermore, there is no safe pedestrian access to village services. Residents would need to use Church Road, which is narrow, without pavements, and considered unsafe by the police and the local Community Speed Watch group. This directly conflicts with Policy TR01, which seeks to promote walking and cycling.

The allocation also ignores the Whimble Housing Needs Survey, which found a need for just 4 affordable homes over the next five years. Allocating 83 homes in the village (including the Whim_11 site) is inconsistent with this evidence and conflicts with Policy HN01, which stresses that developments must respond to documented local housing needs.

There are unconfirmed wildlife habitats that haven't been investigated. The Parish Council's preference would be that a site is allocated to the east of Church Road so that it is nearer to the established infrastructure near the Hand and Pen (Bramley Garden's is to the West). It is the view of the Parish Council that further work should be carried out on all of the sites by the professional Planning Officers before any allocation is made in Whimble. The spontaneous decision to offer up Bramley Gardens was inappropriate and against expert advice.

The allocation fails to consider the 1,500 homes already approved in the Cobdens Expansion of Cranbrook, which sits within Whimble Parish and includes a school and traveller site. Given the existing infrastructure in that area, additional allocation in Whimble village itself is unnecessary and unjustified.

In addition, the partial allocation was previously deemed inappropriate by EDDC officers. No new flood risk assessments or environmental assessments have been completed to support this change. This makes the plan unsound, as it is not based on proportionate evidence.

Full name: Abi Mewse

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Unsound allocation contrary to spatial strategy, officer advice and infrastructure limitations I object to the allocation of site Whim_08a in Policy SD29 of the EDDC Emerging Local Plan on the grounds of soundness. The decision to allocate this site contradicts professional planning advice and is not supported by robust evidence.

At the October 2024 Strategic Planning Committee, EDDC's own planning officers recommended that Whim_08 was unsuitable for allocation. They cited reasons including incompatibility with the spatial strategy, a lack of safe pedestrian access, and impact on the Green Wedge. Despite this, the Committee reversed its decision one month later in November, allocating part of the site without providing any evidence or justification for the change. This lack of transparency and disregard for expert opinion undermines the justified and effective tests of soundness.

Furthermore, Church Road, the main access route, is narrow, lacks pavements and is not a safe route for pedestrians. There is a high risk to public safety, particularly for children walking to the local school, and this contradicts the objectives of Policy TR01 to prioritise sustainable travel.

The plan also fails to consider the 1,500 homes already approved in the Cobdens Expansion of Cranbrook, which sits within Whimble Parish and includes a school and traveller site. Given the existing infrastructure in that area, additional allocation in Whimble village itself is unnecessary and unjustified.

Whimble is classified as a Tier 4 settlement, where only limited development should occur. However, the plan proposes 83 houses in total (Whim_11 and Whim_08a), far exceeding the 4 affordable homes identified as needed in the Housing Needs Survey. This goes against Policy SP01 and HN01, which state that development should match local needs and fit the character of the village.

The allocation of Whim_08a ignores this context and the professional recommendation that even partial allocation was inappropriate. Without updated evidence or justification, the plan does not meet the justified or effective tests of soundness and should be amended to remove this site.

Full name: Peter Charles Montgomery

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The road infrastructure, both to and through the village, which are very dangerous particularly to pedestrians, cyclists, horses etc and any increase in population will only exacerbate this problem.

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.: If they laid a new road with pavements from Hand and Pen (old A30) connecting the south and north of the village that should satisfy our main health and safety concerns

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Our main objection to the proposed developments in Whimble are road infrastructure, both to and through the village, which are very dangerous particularly to pedestrians, cyclists, horses etc and any increase in population will only exacerbate this problem. A footpath through the orchard north of Whim 08 is hardly going to change the situation. The road infrastructure in Whimble is similar to Branscombe – a long pavement-less lane both to and through the village and as far as I can find out just ten new homes were proposed for Branscombe in 2016 (and that's too many.)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: If they laid a new road with pavements from Hand and Pen (old A30) connecting the south and north of the village that should satisfy our main health and safety concerns but we would steal be losing our green wedge as well as prime agricultural land and it would be undoubtedly harmful to wildlife. As deer use that green wedge to commute between north and south Whimble, it's essential to maintain a buffer between Cranbrook and Whimble.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No for the reasons given.

Full name: Victoria Murphy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to share my concerns with regards the local plan for East Devon and, more specifically the allocation of Whim_08, potential allocation of land next to Brantley Gardens for development.

I would like to confirm that I agree with Whimble Parish Council's challenges to the policy and would like to echo their concerns. Please take it as written that those concerns are included as part of this submission without the need for duplication here.

In particular I have significant concerns over the traffic levels and road safety in Whimble as it stands already and consider Church Road to already be dangerous to turn out on to from Hindstrete, Dince Hill and Bramley Gardens. Any proposed developments would exacerbate this, making the village unsafe for children and animals (there are already a lot of pets and wildlife falling victim to the road as it is). The comments in the Parish Council's response with regards pavement safety are wholeheartedly supported.

Whimble is currently an example of an attractive village with a nice community, adequately supported by services for the people living here but would not be able to support further developments to any real degree (eg via the school and village shop). Other sites are more appropriately serviced following recent development eg Cranbrook.

Without prejudice to the above challenge, in the event that the site was allocated the following must be noted:

- the proposed allocation site is home to a sewerage treatment plant for a number of houses and consideration would need to be given to how this would be dealt with: going on to mains sewerage is exceptionally expensive and not feasible for the properties in question; and

- any development should be made at a reasonable distance from the properties on Hindstrete and Bramley Gardens to allow continued enjoyment of those properties which currently sit on the edge of the Green Wedge.

Full name: Jason Odell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Whim_08a is unsound due to conflict with policies, infrastructure concerns and lack of evidence I object to the inclusion of site Whim_08a in the EDDC Emerging Local Plan on the grounds of soundness. This proposed allocation is not justified, not supported by proportionate evidence, and is inconsistent with several key Local Plan policies. The site lies within the designated Green Wedge between Whimble and Cranbrook. According to Policy OL05, development in these areas should be avoided where it risks settlement coalescence or harms the character of the local landscape. Allocating Whim_08a would undermine Whimble's rural identity and clearly breaches this policy. Access to the village from the site is also unsafe. There are no pavements along Church Road – the main route to local amenities such as the school and shop – and the road is narrow and hazardous. The police and Community Speed Watch group have both raised concerns. This directly contradicts Policy TR01, which aims to prioritise walking and sustainable transport. The allocation also fails to align with local housing needs. The Whimble Housing Needs Survey identified a requirement for only four affordable homes over five years, yet this plan allocates 83 homes in total (Whim_11 and Whim_08a), far exceeding what is required. This conflicts with Policy HN01, which states that housing development should reflect identified need. There are also unconfirmed wildlife habitats on the site that have not been properly assessed, and no updated flood risk or environmental assessments have been provided to support this partial allocation – despite it having previously been ruled out by EDDC's own planning officers. Furthermore, the allocation of Whim_08a appears to have been made spur-of-the-moment, going against professional advice and without clear justification. Meanwhile, other more suitable sites — including land to the east of Church Road near established infrastructure — have not been properly evaluated. The Parish Council has asked that these alternatives be considered before any final allocations are made. Importantly, the plan also ignores the 1,500 homes already approved in the Cobdens Expansion of Cranbrook, which falls within Whimble Parish and includes a school and traveller site.

These homes will meet housing needs with far better access to infrastructure than Whim_08a. Ignoring them when determining Whimble's housing allocation further undermines the soundness of the plan. In summary, this allocation is unsound. It conflicts with planning policy, disregards expert assessments, fails to reflect local needs, and does not follow a transparent or evidence-led approach. I request that Whim_08a be removed from the Local Plan.

Full name: Mark Paterson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Although I am not completely sure if this will be a legal factor, it is worth noting. This land has been designated as Land of Local Importance. That designation is there for good reason — to protect green spaces that matter to the community and the local environment. It helps preserve the rural character of Whimble and offers a valuable green buffer that contributes to the wellbeing of the village. Allowing a development on this land would completely undermine the purpose of that designation.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Flood risk is a major issue. The field is often waterlogged, and the stream at the bottom of the site has overflowed several times this winter alone — something that's happening more frequently in recent years. Building houses here will only increase the problem, pushing excess water into the surrounding area and raising the risk for existing homes. It's hard to see how this could be considered a safe or sensible location for development.

The environmental impact also can't be ignored. The site is home to a number of mature trees — including a historic oak — several of which are protected by Tree

Preservation Orders. The area is also used by protected wildlife, including bats and otters, both of which have been regularly seen near the stream and surrounding fields. Any development here risks destroying habitats and putting protected species at risk.

Importantly, this land has been designated as Land of Local Importance. That designation is there for good reason — to protect green spaces that matter to the community and the local environment. It helps preserve the rural character of Whimble and offers a valuable green buffer that contributes to the wellbeing of the village. Allowing a development on this land would completely undermine the purpose of that designation.

Traffic, however, is the issue that worries many of us most. Whimble's roads simply aren't built for this kind of increase in cars. The centre of the village has several narrow pinch points where only one car can pass at a time. There are very few pavements, making it risky for pedestrians — especially children walking to school, families with pushchairs, and older residents. We already deal with congestion at busy times, and it's hard to see how 33 houses — and the associated cars — won't make things significantly worse.

In particular, Talaton Road (and the roads feeding into it) would become even more congested. It's effectively a single-track road, already difficult to navigate when there's two-way traffic or delivery vans. Adding more vehicles to it is a serious safety risk — especially considering it's used by farm vehicles, cyclists, and walkers as well.

Cranbrook, just a few miles away, has been purpose-built with this kind of expansion in mind. It has wider roads, proper pavements, schools, shops, and services that are designed to accommodate more housing. Whimble simply doesn't — and trying to force that kind of development into a rural village setting just isn't sustainable.

In short, WHIM_11 isn't the right plan for Whimble. It puts pressure on roads, local services, and the environment — and goes directly against the protections in place for this piece of land. I hope the Council will continue to listen to the community and reject the proposal.

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.: With near misses around the area of Whimble Primary School being a regular concern, such an increase in traffic for the local population would likely require a one-way traffic management system to be formally introduced on School Hill. Building over 30 new houses (and probably adding 40-50 new cars) at Whimble_11 and significantly increasing the weight of traffic in mornings and evenings to/from the northern side of the school completely defies logic.

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.: The environmental impact also can't be ignored. The site is home to a number of mature trees — including a historic oak — several of which are protected by Tree Preservation Orders. The area is also used by protected wildlife, including bats and otters, both of which have been regularly seen near the stream and surrounding fields. Any development here risks destroying habitats and putting protected species at risk.

Importantly, this land has been designated as Land of Local Importance. That designation is there for good reason — to protect green spaces that matter to the community and the local environment. It helps preserve the rural character of Whimble and offers a valuable green buffer that contributes to the wellbeing of the village. Allowing a development on this land would completely undermine the purpose of that designation.

Traffic, however, is the issue that worries many of us most. Whimble's roads simply aren't built for this kind of increase in cars. The centre of the village has several narrow pinch points where only one car can pass at a time. There are very few pavements, making it risky for pedestrians — especially children walking to school, families with pushchairs, and older residents. We already deal with congestion at busy times, and it's hard to see how 33 houses — and the associated cars — won't make things significantly worse.

In particular, Talaton Road (and the roads feeding into it) would become even more congested. It's effectively a single-track road, already difficult to navigate when there's two-way traffic or delivery vans. Adding more vehicles to it is a serious safety risk — especially considering it's used by farm vehicles, cyclists, and walkers as well.

Cranbrook, just a few miles away, has been purpose-built with this kind of expansion in mind. It has wider roads, proper pavements, schools, shops, and services that are designed to accommodate more housing. Whimple simply doesn't — and trying to force that kind of development into a rural village setting just isn't sustainable.

In short, WHIM_11 isn't the right plan for Whimple. It puts pressure on roads, local services, and the environment — and goes directly against the protections in place for this piece of land. I hope the Council will continue to listen to the community and reject the proposal.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Stephen Patrick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to object to the Whim_08 plan for my village. There was always meant to be a green wedge between Whimble and Cranbrook, yet we already have an incursion within the village boundary of a travellers site you have approved. Now you wish to extend this to another 50 that could increase to near 180. There are also 1500 homes being built on the Whimble side of Cranbrook and even some of these could be within Whimble Boundary already.

This will greatly impact the villages rural setting and destroy the community feel with too many additional houses. It is fast becoming a suburb and losing it's village feel. Wildlife would also be destroyed if this goes ahead as planned. Should this extend into one of the historic orchards then it would also be destroying the history of the village and these orchards should be protected.

The roads are in no way adequate for such an increase either. The only route for people to access the shops, pubs and school would be down Church Road, and there are no pavements here and as such would increase dangers to pedestrians. The entrance to the village from the A30 has already seen an increase with traffic, including through traffic, and also has no paved area for pedestrians, with traffic travelling too fast. Increasing the amount of traffic to this extent would be plain dangerous.

Full name: Matthew Lawson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site has already been rejected from inclusion in the Local plan on three separate occasions.

The development would increase the risk of further and more regular flooding downstream of the plot. In recent years engineering of the banks of the stream passing Slewton Crescent has failed and needed to be replaced or repaired and recent flood events have been the worst in memory. Climate change will only increase the likelihood of flooding and increase the chance of properties being flooded/damaged and it is unlikely future developments will adequately mitigate flood risk.

The village access roads are not of sufficient width or quality to allow a safe increase in the volume of traffic. The village has suffered from speeding drivers (as evidence by the Parish Council introducing a speed watch) and drivers not driving with due care and attention through the centre of the village which lacks pavements. Being a rural area, horse riding, livestock movements and cyclists are common and would their safety would be put under threat by an increase in commuter traffic.

EDDC had previously designated the site as Land of Local Importance, which should not be built upon and should be used for activities which retain its open nature

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please

be as precise as possible.: The proposal doesn't take into account that current GP medical centres and the local school are at or near capacity and it is unlikely that these could be scaled up fast enough to keep pace with the rise in population.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Bruce K Maclagan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I object to the above plan.

This site, Whim_08, was considered by EDDC Strategic Planning Committee on 1st October 2024 and took reports from professional planning officers who recommended that the site was NOT allocated for building. There were a number of sound reasons given, and at a public meeting held in Whimble where Planning Officers were in attendance they strongly denied that the site was a possibility for development. The building of some 50 houses would increase the identified risk of flooding, It is probable the the house owners would have private transport of at least one car per house. Whimble does not have the infrastructure to cope with even more cars entering and leaving Church Road, the main road into and out of the village. There are no suitable footpaths in the village, should those house owners decide to walk anywhere, it's already a dangerous place to walk without yet more traffic. More delivery / service vehicles would be in evidence exacerbating the problem. The site is part of the ' Green Wedge' between Whimble and Cranbrook which has already been ignored by EDDC ! This site is contrary to EDDC Emerging Local Plan Policy HN01.

Please advise me what has changed that has allowed this site to be now considered, apart from your arbitrary decision !

Full name: Sam Scotcher

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Whim_08 site is on a scale of development incompatible with spatial strategy. Furthermore, the site lacks safe and convenient pedestrian access to services and facilities in the village. The site also forms part of the 'Green Wedge' between Whimble and Cranbrook. This land forms an important part of the very attractive rural landscape setting for the settlement. It is also highly likely to have a negative impact on wildlife. Of great concern is the risk of flooding, and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation. The decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made to partially allocate the site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As the decision to allocate Whim_08a was made without solid evidence provided by the Planning Officers report and recommendations, I do not believe that any modifications can make this a sound plan. Therefore, it should be removed from the EDDC Emerging Local Plan and the homes should be allocated elsewhere in the district (outside of Whimble Village), where there is appropriate infrastructure. It is my view that further work should be carried out on all of the sites by the professional Planning Officers before any allocation is made in Whimble.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Hannah Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I do not know what this means or where to find information about it, therefore I cannot agree that it is legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I do not believe that Whimble can cope with a big increase in number of new homes due to the existing infrastructure and the lack of opportunity to be able to improve it. For example, the road through the village is narrow, with blind bends and houses on either side, preventing it from being widened. An increased number of cars, delivery vehicles as well the initial construction traffic, will make it dangerous to both drive and walk through Whimble.

Whimble Primary School has already expanded the buildings to meet pupil needs and even now, uses the Victory hall every day because of a lack of suitable hall space. Building 33 homes on Whim_11 (and the proposed 50 homes on Whim_08) will increase the number of pupils (and therefore the associated traffic to and from school)- how does the council plan to meet the needs of all these pupils?

I also do not believe that Whim_11 is a sound choice due to the flood risk and the associated risk to properties nearby. What will happen to existing homes if the stream floods further downstream near Sleuton Crescent?

Also, the loss of another green field is extremely disappointing, especially as there are thousands of homes that have, and are, still being built only a few miles from the village in Cranbrook.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not develop the site!

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I do not believe that the best interests of the residents of Whimble have been considered. There is a lack of planning relating to how the infrastructure will cope with the additional homes and what will be implemented to improve or help the situation. The transport connections have also not been fully considered as although Whimble has a train station, there are limited stops and also no regular bus service into Exeter. The numbers of home proposed to be built in Whimble (83), far exceeds the housing needs of residents already living nearby (according to the Parish Council Housing Needs Survey). The environmental protection is lacking due to the flood risk and loss of natural environment.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Hannah Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I cannot comment on this as I do not know if this part is legally compliant as I do not know where to access information about it.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I do not believe that the plan has been positively prepared. I believe that Whim_08a is not a sound site for a housing development in the village for the following reasons:

- The Parish Council commissioned a housing needs survey and the results showed that at least 4 affordable homes may be needed within the next 5 years. Allocating 83 new homes to Whimble far exceeds the needs of the village. This is especially true considering that the new town of Cranbrook is only 4.5 miles away and 500 homes for that settlement actually fall within the boundary of the parish of Whimble, which therefore more than makes-up this need.
- Councillor Geoff Jung's reason for supporting the Whimble 08a site during the Strategic Planning Committee 1st October 2024, was that "We have allocated 35 homes for Whimble and it has a train station. How can I justify that to the residents that I represent and villages that are have taken far far more, I want to see some development at this site". This is not a sound reason to develop a particular site and illustrates that

the plan has not been positively prepared. I do not believe that the strategies and policies are justified and have not been based on solid evidence. Professional planning officers assessed Whim_08 and recommended that the site was not allocated for a number of reasons, see the bullet points below:

- The proposed site forms part of the green wedge between Cranbrook and Whimble.
- Whim_08a is an important part of the attractive rural landscape.
- There is a potential impact on wildlife.
- Part of the site is at risk of flooding.
- The scale of the development is not compatible with the special strategy.
- There is very limited safe pedestrian access to the facilities in the village.

Building upon the green wedge will lead to the possibility of settlement coalescence of Cranbrook with Whimble. This would result in the loss of the individual character of the village, as well as the loss of the surrounding countryside, which gives Whimble its unique identity. Also, it sets a precedent for further development in this area. The infrastructure of the village is not sufficient for the increase in number of homes: o

Whimble Primary School is not of a sufficient size for an increase in number of pupils. o Church Road is single track in many places, with very few pavements, making it unsafe for an increased number of children to be walking to and from school.

o Building homes at Whimble 08a will result in more traffic driving through the village to access the facilities. The roads are narrow and visibility poor in many places, making it dangerous. o Church Road near the school is frequently congested, due to families driving to school. o There is very limited parking elsewhere in the village.

Developing Whim_08a is not a sound and effective proposal. This is due to the many sustainability issues involving the lack of suitable infrastructure including a primary school which cannot cope with the influx of many more pupils, the narrow road with blind bends and the lack of pavements. There is also the issue of potential flood risk which could cause problems not only on the site but may also affect nearby properties that are currently unaffected. There is also the loss of green field and habitat, which will never be recoverable as well as the erosion of the green wedge, which is supposed to prevent development from spreading from one settlement to another. The National Planning Policy Framework, Identifying land for homes 72. states that planning policies should identify a supply of both a) sites for 5 years following the date of adoption and b) developable sites or broad locations for growth for years 6-15 of the remaining plan period. If 50 homes are built upon Whim_08a in the near future, I can fully imagine where the next quota of houses will be situated: on Whim_08a. This site is not sustainable and therefore not an effective and sound choice.

Although the Government have decided that a certain number of new homes must be built and allocated in East Devon, I do not believe that local priorities have been fully addressed. For example, the number of houses allocated far exceeds the needs that the Parish Council Housing Needs Survey identified. Furthermore, the Site Selection report states that: ‘Contribution to spatial strategy Whimble is a 'Tier 4' settlement, where the draft local plan seeks to promote limited development to meet local needs. The development of up to 180 dwellings on Whim_08a is considered to be excessively high in relation to the scale of the existing village.’

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Whim_08a should not be developed at all.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

- Transport connections: I do not believe that the full implications of the extra traffic that a development of 50 homes would create, have been fully considered. The main road to the village is single track in many places, with blind bends and buildings/gardens flanking the road, therefore widening the road is impossible. It cannot safely and sustainably support the increase in the traffic that a development of this size would create. Whimble is often promoted as having a train station, however, the service is not reliable and the number of stops reduced significantly after the creation of the train station at Cranbrook. Furthermore, being realistic, residents may drive to the train station, therefore putting the limited parking facilities under greater pressure.

- **Housing needs:** The Parish Council commissioned a housing needs survey and the results showed that at least 4 affordable homes may be needed within the next 5 years. Allocating 83 new homes to Whimble far exceeds the needs of the village. Also, when studying the numbers on the Regulation 19 Publication Draft, February 2025, Appendix 2 – Designated Neighbourhood Area Housing Requirement Figures Breakdown, states that Whimble has 500 homes allocated under the Adopted Cranbrook Plan Allocations. If these homes fall within the boundary of the parish of Whimble, then a further 83 homes is completely unnecessary. The nearby village of West Hill has only been allocated 64 homes and doesn't include any homes from Cranbrook encroaching the village.

- **Environmental protection:** Planning officers have already dismissed Whim_08a as being unsuitable in part due to the resulting loss of very attractive rural countryside and the potential impact on wildlife sites. The officers also highlighted concerns over potential flooding on the site. There has been no mention how building 50 homes here will affect the flood risk, not only to new homes but existing homes. Protecting the existing homes must be a priority, not only considering flooding but also from a visual, environmental pollution, light pollution and noise pollution perspective.

- **Infrastructure planning:** The infrastructure of the village is not sufficient for the increase in number of homes. There has been no communication of ways that the following issues could be rectified:

- o Whimble Primary School is not of a sufficient size for an increase in number of pupils. The school already relies daily on using the Victory Hall to be able to provide sufficiently for the current pupils. This in turn means that other users, cannot access and benefit from the hall.

- o The road through the village is single track in many places, with very few pavements. It is therefore not safe for an increased number of children to be walking to and from school (see photos)

- o Church road near the school already becomes congested, especially in the morning and at school collection time, but also during the daytime, as many cars remain parked along the road opposite the Hive all day. This, combined with the existing road usage of tractors, school buses, delivery drivers etc, make the idea of further increasing the vehicular and foot traffic a nonsensical notion. The Headteacher at Whimble Primary School has voiced concerns over safety regarding drop off and collection times and parking whilst doing so. This is a quote from a school newsletter dated 24.01.25: (also see attachment)

“PARKING: Due to the requirements of the start and end of the day, schools by their very nature end up causing congestion around them. It is important, particularly in villages with narrow roads, like Whimble, that we all do what we can together to help minimise the impact of this for the locals who live here. We have had reported a number of near misses with cars and children, particularly in the hall car park but also, from older children walking home. We want to keep all our children and families safe so it is up to you to help with this. How you can help: Reduce your speed - do not zoom across to park beside the road near to the school. Parents are asked not to park in the hall car park as this is for hall users and the doctors surgery. The Thirsty Farmer continues to support the school by allowing parents to park there - please do this with consideration for others. Be considerate of pedestrians - look around, especially when opening car doors.”

Building homes at Whimble 08a will result in more traffic driving through the village to access the facilities such as the school and the village stores. The roads are narrow and visibility poor in many places, making it dangerous for both pedestrians and drivers.

- o There is very limited parking in the village, with the Victory Hall car park often full, cars often parked extremely close to the roundabout near the Thirsty Farmer, the Square

often being full of parked cars and the car park off Webbers Close, also often full to capacity. (see photos attached)

o Sandfords doctor surgery is also quoted as a positive reason to increase the number of homes in the village. However, this is purely a different setting, manned by Coleridge Medical Centre in Ottery. I do not believe that it provides a greater number of appointments to users of the surgery and is also used by patients outside of the area, who drive in to the village, if they are offered an appointment here, instead of in Ottery. It is already difficult to receive the medical care that we are all entitled to and currently hard to get an appointment- Councillor Todd Olive implied as such as he put forward Whim_08a as a potential site. No doubt, any additional patients using the surgery will only increase the traffic and parking issues.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I wish to represent the voice of Whimple residents.

Full name: Justin Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This comment relates to the whole paragraph. It argues that the Whimble 11 is NOT a sound site for development.

Positively prepared: As part of the work on the Whimble neighbourhood plan, the Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states ‘The survey identified a need for at least 4 affordable homes within the next 5 years.’ The allocation of 33 houses to Whim_11 is not consistent with the requirement established by the Parish Council. The counter argument to this is that the wider local plan needs to ‘consider how we might help neighbouring areas meet their needs too’. However, Whim_11 and the wider plan for Whimble seems to ignore the expansion of Cranbrook, the erosion of the Green Wedge between the two settlements, the allocation of 611 - 500 of which relate to Cranbrook expansion - to the Whimble Parish between now and 2042. In summary, I contest the requirement to develop in Whimble and, when considering the wider needs of the Local Plan, I argue that Whimble has more than its fair share of development planned within its Parish boundaries.

Justified: I believe Whimble 11 to not be a justified site for development because the site is not sustainable - a key justification point for the policy in paragraph 3.2. The sustainability issues are: it lacks safe pedestrian access to services and facilities; there is a stated 20% risk of flooding which must be fully analysed by the developers before building starts – this doesn’t consider the wider water run-off and impact on The Green which is an area of Whimble which consistently suffers from flooding; it will likely have an impact on unconfirmed wildlife sites.

Effective: The policy of aligning growth with infrastructure has clouded the judgement of the local plan because ‘on paper’ Whimble is an attractive potential Service Village with good facilities, services and infrastructure. When viewed against the mandate to build circa 20,000 homes in East Devon by 2042, I understand the appeal of allocating development to Whimble. However, the reality of living in Whimble is that access to the village from the A30 and throughout the settlement to the associated facilities, is already heavily limited – I would argue it is at capacity but have no hard evidence to back this up. Subjectively, it can take over 10 minutes to get out of the village at rush hour (normally a 4 minute drive) due to congestion at bottlenecks throughout the settlement. There is no opportunity to develop better access owing to immovable objects such as properties and the church. Based on this I argue that further development, and an increase in the population of Whimble, targeting the preexisting facilities, is unsound and unsustainable due to the limited access bandwidth. This doesn’t consider the impact, albeit temporary, during the construction phase of any new development which would be considerable. At the 1 November SPM it was also highlighted that no significant development had occurred in Whimble for around 20 years. Instead of assuming that this makes Whimble prime for development in the 2020 - 2042 Local Plan, I contend it reinforces my argument that Whimble 11 is an unsound site for development. Whilst I assume development in Whimble has previously been considered, it has been discounted for over 20 years. I suspect part of the reason for Whimble being rejected is because of the practicality issues associated with access to the settlement. In summary of this paragraph, development of Whimble 11 will further exacerbate the aforementioned issues, detract from the rural appeal of the village be dangerous because the infrastructure (roads, paths, parking) lack the bandwidth for further development.

Consistent with national policy: No comment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Flooding risk and mitigation must be mandated in this chapter.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Transport connections. Access to Whimble is limited by bottlenecks caused by pre-existing infrastructure. This limits access to the village by large vehicles (construction vehicles, buses etc) and cars. An alternative is to use the pre-existing train station but again there is limited access to the facility by pedestrians (no continuous path connecting one side of the village to the other), cars (bottlenecks) and very limited parking throughout the village and at the train station itself.

Housing needs. As part of the work on the Whimble neighbourhood plan, the Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states 'The survey identified a need for at least 4 affordable homes within the next 5 years.' The 83 houses allocated to Whimble (Whim_08a and Whim_11) exceed the need highlighted by this survey.

Environmental protection. The Whim_11 site comes with a known flooding risk but does not consider the wider flooding issues downstream of the proposed site and which are already a notable issue in the village.

Infrastructure planning. The plan does not mandate appropriate improvements to the pre-existing supporting infrastructure (specifically improvements to roads and paths to alleviate access bottlenecks throughout the settlement). Practically, these would be difficult to incorporate given very limited opportunity to widen the bottlenecks through the village owing to pre-existing houses and the church. Flood protection for pre-existing properties must be mandated in the text.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Justin Shaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

This comment relates to the whole paragraph. It argues that the Whim_08a is NOT a sound site for development because it is at odds with the justification for the policy laid out in Chapter 3, the Spatial Strategy.

Positively prepared: At the 1 November 2024 SPM, when Whim_08a was allocated, there was clear pressure from Councillors to allocated new housing to Whimble because they wanted to justify wider their development decisions to the residents of their parishes. This undue pressure created a perceived need and urgency to allocated housing to Whimble in this Local Plan. Conversely, the decision did not consider the wider 611 houses allocated under the Whimble Designated Neighbourhood Area (page 37 of the Local Plan). Whilst the majority of these houses form part of the Cranbrook development in the vicinity of Cobden Lane, they are clearly stated as being in the Whimble Parish. Between the expansion plan of Cranbrook and the Whim_08a development there is an erosion of the Green Wedge and therefore increased risk of Whimble becoming consumed by Cranbrook in subsequent future development plans – again I would argue Whimble 08 is unsound based on this.

Justified: I believe Whim_08a to not be a justified site for development because the site is not sustainable - a key justification point for the policy in paragraph 3.2. This view was captured by the professional planning officers Site Selection Report, Whimble dated September 2024. They stated that the proposed 08 development (originally proposed as

180 homes) was: incompatible with the Spatial Strategy; lacked safe pedestrian access to services and facilities; encroached on part of the green wedge between Whimble and Cranbrook (an critical area required to maintain the identity of Whimble); proposed in an important part of the attractive rural landscape; likely to have an impact on unconfirmed wildlife sites; caused a potential risk of flooding and further survey work would be required on the site before being allocated. It was the recommendation of the report that the site should not be developed, nor should a reduced development be accepted. At the 1 October 2024 Strategic Planning Committee, Whim_08a was rejected as a site for development. With no new evidence presented, this decision was overturned at the 1 November 2024 Strategic Planning Meeting (SPM). This alone demonstrates that Whimble 08 is an unsound choice for development.

Effective: The policy of aligning growth with infrastructure has clouded the judgement of the local plan because ‘on paper’ Whimble is an attractive potential Service Village with good facilities, services and infrastructure. When viewed against the mandate to build circa 20,000 homes in East Devon by 2042, I understand the appeal of allocating development to Whimble. However, I believe this strategic pressure has created a pressure to allocate sites which have previously been discounted as being unfit for development – resulting in unsound decisions - and Whimble 08 is one of those sites. The reality of living in Whimble is that access to the village from the A30 and throughout the settlement to the associated facilities, is already heavily limited – I would argue it is at capacity but have no hard evidence to back this up. Subjectively, it can take over 10 minutes to get out of the village at rush hour (normally a 4 minute drive) due to congestion at bottlenecks throughout the settlement. There is no opportunity to develop better access owing to immovable objects such as properties and the church. Based on this I argue that further development, and an increase in the population of Whimble, targeting the pre-existing facilities, is unsound and unsustainable due to the limited access bandwidth. This doesn’t consider the impact, albeit temporary, during the construction phase of any new development which would be considerable. At the 1 November SPM it was also highlighted that no significant development had occurred in Whimble for around 20 years. Instead of assuming that this makes Whimble prime for development in the 2020 - 2042 Local Plan, I contend it reinforces my argument that Whim_08a is an unsound site for development. Whilst I assume development in Whimble has previously been considered, it has been discounted for over 20 years. I suspect part of the reason for Whimble being rejected is because of the practicality issues associated with access to the settlement. In summary of this paragraph, development of Whim_08a will further exacerbate the aforementioned issues, detract from the rural appeal of the village be dangerous because the infrastructure (roads, paths, parking) lack the bandwidth for further development.

Consistent with national policy: No comment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I propose that Whim_08a be removed from the local plan. I don't believe it to be a sound proposal for the reasons highlighted in 3b. I am unable to propose an alternative site but based on my argument no sites in Whimble are appropriate.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Transport connections. Access to Whimble is limited by bottlenecks caused by pre-existing infrastructure. This limits access to the village by large vehicles (construction vehicles, buses etc) and cars. An alternative is to use the pre-existing train station but again there is limited access to the facility by pedestrians (no continuous path connecting one side of the village to the other), cars (bottlenecks) and very limited parking throughout the village and at the train station itself.

Housing needs. As part of the work on the Whimble neighbourhood plan, the Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states 'The survey identified a need for at least 4 affordable homes within the next 5 years.' The 83 houses allocated to Whimble (Whim_08a and Whim_11) exceed the need highlighted by this survey. Additionally, at the 1 November 2024 SPM, when Whimble 08 was allocated, there was clear pressure from Councillors to allocate new housing to Whimble because they wanted to justify wider their development decisions to the residents of their parishes. This undue pressure created a perceived need and urgency to allocate housing to Whimble in this Local Plan. Conversely, the decision did not consider the wider 611 houses allocated under the Whimble Designated Neighbourhood Area (page 37 of the Local Plan). Whilst the majority of these houses form part of the Cranbrook development in the vicinity of Cobden Lane, they are clearly stated as being in the Whimble Parish. Between the expansion plan of Cranbrook and

the Whimble 08 development there is an erosion of the Green Wedge and therefore increased risk of Whimble becoming consumed by Cranbrook in subsequent future development plans – again I would argue Whimble 08 is unsound based on this.

Environmental protection. The professional planning officers site survey report (September 2024) of Whim_08a did not recommend the site for development with flooding concerns being raised.

Infrastructure planning. The plan does not mandate appropriate improvements to the pre-existing supporting infrastructure (specifically improvements to roads and paths to alleviate access bottlenecks throughout the settlement). Practically, these would be difficult to incorporate given very limited opportunity to widen the bottlenecks through the village owing to pre-existing houses and the church.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: christopher shell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The land in Station Road Whim 11 is unsuitable for housing development for a large number of reasons. Part of the field is a flood plain and the field in general is permeable land acting as a sponge during the increasingly heavy rainfall that we are experiencing. If it is built upon the rainfall will add further to the already existing floodplain and floodwater will flow to the area of Whimple that has already suffered severe flooding in the past. There is also the risk of floodwater mixing with sewage further downstream which will eventually enter the Exe estuary with all the environmental issues that will be created as a result. The field also has numerous mature trees that have tree preservation orders placed upon them. There is an abundance of wildlife in and around the field including bats, owls, woodpeckers, field mice and no doubt other species that need protection. The proposed development of 33 houses would be completely out of character with the existing nearby houses which includes a grade 2 listed house and a number of detached houses. Incongruous development would damage this field which is a delightful hay meadow. Planning permission for Whim 11 has already been refused on at least two previous occasions and is precisely the reason why we purchased the house as we have open views across the field from the rear of our home.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: No further housing development should take place in Whimple.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The access through Whimple is narrow and unsuitable for an increase in traffic that any future development would bring. There are no pavements in a large area of the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: No further developments in Whimple.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Housing development has already been refused three times for Whim 11. That status should remain.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Diane Shell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This field was not developed by Bovis homes 28 years ago as planning permission was refused on the grounds of green site in Whimple. Farmers who rented the land and later bought it from Allied Domecq on the understanding that it would be for agricultural use.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This land should remain a green site, considering flood issues, preservation orders on the trees and wild life habitats. This small piece of land could not possibly contain 33 homes and potentially 66 cars plus pavement and roads.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This land is not sound due to flooding issues not only for near by properties but also properties in The Green at lower levels within the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This land should not

be modified but remain green site to prevent flooding issues in the village and protect wildlife and preserved trees and hedges.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No development plans have been sent to neighbouring properties most affected by housing that could cause flooding to their properties and light pollution. My property which is next to the field and built at a lower level to the field after heavy rain causes water logged lawn and pooling of water in patio area. If 33 properties were built this could cause water to enter the house.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Michael and Tamara Snell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: With reference to the above Plan and particularly to Station Road Whimble which is referred to as Whim_11 (land at Station Road), we have the following observations:

1. We thoroughly endorse the comments submitted by Whimble Parish Council.

2. In the last few months the stream which runs along one boundary of the proposed site has flooded over ten times. It is already a flood risk and more property close by will add to it, particularly at the bottom of Slewton Crescent. Our boundary wall faces the stream and we have first hand knowledge of just how frequently it breaks its banks. Doubtless, climate change with increased rainfall will add to what is already a serious problem.

3. The entry and exit has already been discussed in our Parish Council paper. Additionally we wish to reiterate the danger to pedestrians, wheelchair users and parents with prams as there is no pavement nearby. This applies throughout the village and any increasing vehicular traffic will obviously increase road safety problems.

4. Why doesn't EDDC respond to clarifications, changes or any questions?

5. We feel that the planners appear to overlook historical events, investigations, and existing regulations to suit the needs of fulfilling overall housing requirements. For instance, tree preservation and land of local importance, etc.

We consider that this project should be abandoned.

Full name: Angela Trimblett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I

find it crucial to express my serious concerns pertaining to the East Devon District Council's (EDDC) proposed Emerging Local Scheme, notably policy SD29 and the intended assignment of the Whim_08a plot (Land located to the west of Bramley Gardens). It's my firm belief this assignment is unsound, demonstrating a lack of credible rationale. This unsound assignment threatens the well-being of our community and the integrity of the planning process. The EDDC Strategic Planning Body conducted a review of the Whimble Site Selection Document during a session on October 1, 2024. During this session, seasoned planning personnel offered their detailed analysis of potential locales within Whimble. Drawing from their expertise and reliable evidence, they advised against assigning the Whim_08 location. The planning personnel, with their professional expertise, provided a clear and reasoned recommendation. The personnel's advice against assignment arose from several key elements, each of which requires careful consideration: ? The extent of development clashes with the spatial scheme in place for Whimble. The spatial scheme for Whimble designates limited development to meet local needs. The proposed development at Whim_08a far surpasses this limitation, posing a threat to the village's infrastructure and resources. This conflict with the spatial scheme should not be ignored. ? The site lacks safe and convenient pedestrian entry to essential amenities and resources in the village. The safety of residents, including vulnerable groups, must be a priority. Developing Whim_08a would force residents to use roads lacking adequate pedestrian facilities, creating a dangerous situation. This lack of safe access directly contradicts the Council's stated goals for promoting sustainable transport. ? The site is part of the designated 'Green Band' situated between Whimble and Cranbrook. Green Bands are vital for preserving the unique identity of settlements and preventing urban sprawl. Developing Whim_08a would result in the loss of important green space and the coalescence of Whimble and Cranbrook, an undesirable planning outcome. This would significantly impact the rural character of our area. ? It forms a vital component of

the attractive rural backdrop for the settlement. The rural landscape surrounding Whimble is a valuable asset, contributing to the quality of life and the village's appeal. Development at Whimble_08a would damage this landscape, diminishing the village's unique charm and setting. A potential impact exists on an unverified wildlife habitat. The Whimble_08a site is home to diverse wildlife. Development could have devastating consequences for local ecosystems. Comprehensive ecological surveys are essential before any development decisions are made. Protecting our natural heritage should be a primary concern. A section of the land carries a risk of flooding, necessitating further work to ascertain the nature and scope of the risk. Flood risk is a serious issue, and development in flood-prone areas can have severe repercussions. It is unacceptable to proceed without a thorough understanding of flood risks and robust mitigation plans. It's important to note that during earlier public consultations, planning personnel organized a public gathering at Victory Hall in Whimble. At that event, this specific site was never deemed appropriate for development. Indeed, when local inhabitants inquired, the personnel present issued firm denials of its possibility. This inconsistency raises concerns about the reliability of the consultation process. Initially, at the October 1, 2024, meeting, the Strategic Planning Body sided with the personnel's advice and voted against assigning the site. However, I was both surprised and disappointed when, at the subsequent November 1, 2024, meeting, the body reversed its decision and chose to assign a portion of the site, acting contrary to the personnel's guidance. This reversal of the decision is deeply troubling and raises questions about the factors influencing the committee. To this day, no justification or reason has emerged explaining why this site was favored over other sites in Whimble or East Devon. Furthermore, it seems no additional work was completed by personnel to evaluate the potential hazards tied to this site before its assignment. This lack of transparency and evidence-based decision-making is unacceptable. This determination gives the impression the Strategic Planning Body made a hasty choice to allocate additional dwellings throughout the district, without fully considering a carefully constructed proposal or sound reasons based on evidence and facts. Such an approach undermines careful planning and disregards the legitimate concerns of the local community. The site assignment report itself directly posed the question, "If the entire site lacks suitability for assignment, could a smaller section be assigned?" The qualified planning personnel responded with a firm "No." This clear response should have been decisive. Therefore, similar to Whimble Parish Council, I challenge the soundness of any assignment of this site, whether in full or part. Let's revisit the personnel's reasons for advising against assignment, examining them closely, to ensure the Council fully understands the implications of its decision.

Full name: Martin Trimblett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I

feel it necessary to communicate my deep misgivings concerning the East Devon District Council's (EDDC) proposed Emerging Local Plan, most notably policy SD29 and the suggested designation of the Whim_08a tract (Land situated to Bramley Gardens' west). It is my conviction that this designation is fundamentally flawed and lacks a base in sound reasoning. This flawed designation has the potential to cause lasting harm to our community and the surrounding environment. The EDDC Strategic Planning Committee undertook deliberations on the Whimple Site Selection Report during a meeting held on October 1, 2024. During these deliberations, expert planning officials presented their considered evaluations of potential sites within Whimple. Relying on their professional competence and robust evidence, they advised against the designation of the Whim_08 site. These officials, with their specialized knowledge, provided a clear and well-supported recommendation. The officials' counsel against designation was grounded in several vital factors, each of which deserves careful consideration: ? The scale of the intended development is incompatible with the established spatial strategy guiding Whimple. The spatial strategy for Whimple dictates limited development, focused on meeting local needs. The proposed development at Whim_08a far exceeds this limitation, threatening to overwhelm the village's infrastructure and resources. This incompatibility represents a direct contradiction of the planning strategy. ? The site is deficient when it comes to safe and convenient pedestrian access to essential village services and amenities. Pedestrian safety is of paramount importance. The development of Whim_08a would necessitate residents traversing roads that lack adequate pedestrian facilities, posing a significant risk, particularly to vulnerable individuals. This deficiency directly conflicts with the Council's stated aims to promote sustainable transportation options. ? The site itself forms a segment of the designated 'Green Wedge' positioned between Whimple and Cranbrook. Green Wedges play a crucial role in preserving the distinct identity of settlements and preventing uncontrolled urban expansion. Developing Whim_08a would lead to the loss of valuable green space and the merging of Whimple and Cranbrook, an undesirable planning outcome. This would irrevocably alter the character

of the area. ? It constitutes an important part of the attractive rural landscape that provides a setting for the settlement. The rural landscape surrounding Whimble is a valuable asset, contributing significantly to the quality of life for residents and the overall appeal of the village. Developing Whim_08a would result in the degradation of this landscape, diminishing the village's unique charm. ? There is a potential impact that could affect an unconfirmed wildlife site. The Whim_08a site provides habitat for diverse wildlife. Development could have detrimental effects on local biodiversity. Comprehensive ecological surveys are essential before any development decisions are made. The protection of our natural heritage must be a priority. ? A portion of the site carries a risk of flooding, and further investigative work is required to fully comprehend the nature and scope of this risk. Flood risk poses a significant threat, and development in flood-prone areas can have devastating consequences for communities. It is unacceptable to proceed with development without a thorough understanding of the flood risks and the implementation of robust mitigation measures. It warrants mentioning that during earlier public consultations, planning officials hosted a public event at the Victory Hall within Whimble. At this event, this particular site was never entertained as being appropriate for development. In fact, when local residents posed questions about it, the officials present issued strong denials about its potential. This inconsistency undermines the credibility of the consultation process. Initially, on October 1, 2024, the Strategic Planning Committee concurred with the officials' recommendation and voted against allocating the site. However, I was both surprised and disappointed when, at the subsequent meeting on November 1, 2024, the committee reversed its stance and decided to allocate a part of the site, acting in direct opposition to the officials' advice. This reversal of the decision raises serious concerns about the committee's decision-making process and the factors that influenced the change in position. To this day, no justification or sound reasoning has been provided to explain why this site was preferred over other sites in Whimble or the wider East Devon area. Furthermore, it appears that officers did not complete any additional work to properly assess the risks linked to this site before its allocation. This lack of transparency and the absence of evidence-based justification are deeply concerning. This decision creates the distinct impression of the Strategic Planning Committee making a hasty decision to allocate more housing across the district, without adequately considering a carefully developed proposal or robust justification supported by evidence and facts. Such an approach disregards the importance of careful planning and the legitimate concerns of the local community. The site allocation report itself directly addressed the question, "If the whole site lacks suitability for allocation, could a smaller part be allocated?" The professional planning officials provided a firm "No" in response. This decisive response should have been the determining factor. Therefore, much like Whimble Parish Council, I challenge the soundness of any allocation of this site, whether it be full or partial. Let us now revisit the officials' reasons for

recommending against allocation, examining them in detail, to ensure that the Council fully appreciates the implications of their decision.

Full name: Harry Trimblett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am compelled to register my serious reservations regarding the East Devon District Council's (EDDC) proposed Emerging Local Framework, specifically policy SD29 and the intended designation of the Whim_08a parcel (Land situated to the west of Bramley Gardens). It is my firm belief that this designation lacks a solid foundation and is, therefore, unsound. This lack of soundness not only undermines the credibility of the Local Framework but also threatens the very fabric of our community. The EDDC Strategic Planning Committee undertook a review of the Whimple Site Selection Document during their meeting on October 1, 2024. During this review, professional planning officers presented their considered analysis of potential locations within Whimple. Drawing upon their experience and substantiated evidence, they advised against the allocation of the Whim_08 location. Their professional assessment, based on years of expertise, was clear and unequivocal. Their recommendation to reject this allocation was based upon several key factors, each of which carries significant weight and deserves meticulous consideration: The scope of the proposed development is incompatible with the established spatial strategy for Whimple. Our village is designated within the spatial strategy for limited development, focused on meeting local needs. The proposed scale of development at Whim_08a far exceeds what can be considered "limited" and would place an unsustainable burden on our existing infrastructure and community resources. This incompatibility not only disregards the strategic vision for the area but also risks overwhelming the village's character. The location is deficient in safe and convenient pedestrian access to essential services and facilities within the village. The safety of our residents, especially vulnerable groups such as children and the elderly, is paramount. Developing Whim_08a would force residents to navigate narrow, often dangerous roads without adequate pedestrian provisions. This lack of safe access directly contradicts the Council's objectives to promote sustainable transport and healthy lifestyles. The site constitutes a portion of the designated 'Green Wedge' that lies between Whimple and Cranbrook. Green Wedges are crucial for maintaining the distinct identity of settlements and preventing urban sprawl. Developing Whim_08a would erode this vital green space, leading to the

coalescence of Whimble and Cranbrook, a planning outcome that should be avoided at all costs. This would have a detrimental impact on the rural character of our area. It represents an integral component of the visually appealing rural landscape that forms the setting for our settlement. The beauty of our natural environment is not merely aesthetic; it contributes significantly to the quality of life for residents and the attractiveness of our village. Developing Whim_08a would scar this landscape, diminishing the unique character and setting of Whimble. There exists a potential impact upon an unconfirmed wildlife site. It is imperative that we protect our natural heritage and biodiversity. The Whim_08a site is known to harbor a variety of wildlife, and development could have devastating consequences for local ecosystems. Further ecological surveys are essential before any development decisions are made. A section of the land is vulnerable to flooding, necessitating further investigation to ascertain the nature and extent of the associated risk. Flood risk is a serious concern, and development in areas prone to flooding can have severe consequences for both residents and property. It is unacceptable to proceed with development without a comprehensive understanding of the flood risks and appropriate mitigation measures. It is important to recall that during earlier public engagement, planning officers conducted a public forum at Victory Hall within Whimble. During that event, this specific site was never entertained as a suitable option for development. Indeed, when local residents raised direct inquiries, the officers in attendance explicitly denied its potential consideration. This inconsistency in the Council's position is deeply troubling. Initially, at the meeting held on October 1, 2024, the Strategic Planning Committee aligned themselves with the officers' professional recommendation and voted against the allocation of the site. However, I was greatly surprised and disappointed when, at the subsequent meeting on November 1, 2024, the committee executed a complete reversal and decided to allocate a portion of the site, thereby contradicting the officers' considered advice. This abrupt about-face raises serious questions about the decision-making process and the factors influencing the committee's change of heart. Regrettably, no clear justification or rationale has been provided to explain why this particular site was favored over alternative sites, either within Whimble itself or the wider East Devon area. Furthermore, it appears that no supplementary work has been undertaken by officers to thoroughly assess the potential risks linked to this site prior to its allocation. This lack of transparency and evidence-based decision-making is unacceptable. This decision gives the distinct impression that the Strategic Planning Committee has acted with undue haste in their perceived need to allocate additional housing throughout the district, without affording appropriate consideration to a fully developed proposal or sound justifications rooted in evidence and factual data. This approach not only undermines the integrity of the planning process but also disregards the legitimate concerns of the local community. The site allocation report itself explicitly addressed the query: "If the whole site is not suitable for allocation, could a smaller part be allocated?" The considered response from the professional planning

officers was an unequivocal "No." This clear and definitive statement should have served as the final word on the matter. Consequently, I, in alignment with Whimble Parish Council, challenge the very soundness of any allocation pertaining to this site, whether in its entirety or only partially. Let us now revisit the officers' stated reasons for recommending against the allocation, and examine these in greater detail, ensuring that the Council fully understands the implications of their decision.

Full name: Bex Vanstone

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I'm writing to strongly object to the housing going up in winter gardens.

We have lived at little Loxbrook farm (Ex53bn) since 2012 , our business is having horses on livery and breaking (baby horses) and schooling problem horses. when we first arrived the country lanes were quiet with traffic but slowly as Cranbrook went up turned dangerous for the horses and people.

We have had extreme accidents resulting in hospital stays and on one occasion a horse loosing its life at a later date due to injury from dangerous driving. I can confirm that horse and riders are MEANT to be the most protected on the roads?

We personally are always polite and move on to a safe place as soon as we can for road users and thank them for their patience , never rude or ignorant keeping their time longer than needed.

We have been run off the road by angry drivers and tailed by drivers that come back to make fun when the horses are spooked.

Are you trying to get rid of local businesses?

Or have someone seriously hurt (which they have been) or even worse killed?

I've seen walkers/ cyclists/ riders / wheel chair users nearly run over / abused/ shouted at and physically hit by the drivers which seem to be extremely angry!

The sewage is a massive problem constantly having to be pumped out and won't cope with more houses as can't now!

The flooding is horrendous (all pictures/ videos attached)

What about the wildlife?

What are you going to do about all of this?

Full name: Sandra Anne Venton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: My assumption is that it is compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The part of Chapter 5 is not sound. In October 2024, the professional judgement of the planning officers was that the site was NOT recommended for the following reasons which REMAIN VALID: (1) the scale of the development is incompatible with the spatial strategy; (2) the site lacks safe and convenient pedestrian access to services and facilities in the village; (3) the site forms part of the 'Green Wedge' between Whimble and Cranbrook; (4) the site forms an important part of the very attractive rural landscape setting for the settlement; (5) the potential impact on unconfirmed wildlife site; (6) part of the site is at risk of flooding and needs more detailed consideration before it is given to allocation. All six of these are of concern but especially the fact that the development goes against the spatial strategy and far exceeds the local needs – by 45 times – the assessed local need is for 4 affordable homes. As a resident of Bramley Gardens I am especially concerned that the impact of the development on the wildlife on this site which is home to bats, owls, woodpeckers, deer and badgers. There is also a flood risk which needs further assessment. However, my greatest concern is that this development is within the green wedge and its development would lead to settlement coalescence between Whimble and Cranbrook. This goes against EDDC Emerging Local Plan Policy OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The allocation of this site goes against the professional judgement of the Planning officers. The development would be better placed elsewhere in Whimple or in Cranbrook or elsewhere where there is appropriate infrastructure for example, the Cobdens expansion of Cranbrook and also, the site east of Church Road close to the established infrastructure near the Hand and Pen.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: My assumption is that it is compliant.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Stephen Venton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation and policy is not based on solid evidence. In October 2024, the professional judgement of the planning officers was that the site was NOT recommended for the following reasons which REMAIN VALID: (1) the scale of the development is incompatible with the spatial strategy; (2) the site lacks safe and convenient pedestrian access to services and facilities in the village; (3) the site forms part of the 'Green Wedge' between Whimble and Cranbrook; (4) the site forms an important part of the very attractive rural landscape setting for the settlement; (5) the potential impact on unconfirmed wildlife site; (6) part of the site is at risk of flooding and needs more detailed consideration before it is given to allocation. Furthermore, with respect to (1), the EDDC Site Allocation Report for Whimble states 'Whimble is a is a 'Tier 4' settlement, where the draft local pan seeks to promote limited development to meet local needs. A recent assessment has identified a local need for 4 affordable homes in the next 5 years. The development of up to 180 dwellings on Whim_08 is considered to be excessively high in relation to the scale of the existing village and local needs. In addition, with respect to (3), the EDDC Emerging Local Plan Policy OL05: Green Wedges states 'Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.' The site is within the green wedge and its development would lead to settlement coalescence between Whimble and Cranbrook.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The site is not appropriate for development as set out in response to the previous questions and its allocation goes against the professional judgement of the Planning officers. The development would be better placed elsewhere in Whimble or in Cranbrook or elsewhere where there is appropriate infrastructure – especially with respect to roads/ footpaths – for example, the Cobdens expansion of Cranbrook and also, the site east of Church Road close to the established infrastructure near the Hand and Pen.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rebecca Venton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: My assumption is that it is compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation and policy is not based on solid evidence. In October 2024, the professional judgement of the planning officers was that the site was NOT recommended for the following reasons which REMAIN VALID: (1) the scale of the development is incompatible with the spatial strategy; (2) the site lacks safe and convenient pedestrian access to services and facilities in the village; (3) the site forms part of the 'Green Wedge' between Whimble and Cranbrook; (4) the site forms an important part of the very attractive rural landscape setting for the settlement; (5) the potential impact on unconfirmed wildlife site; (6) part of the site is at risk of flooding and needs more detailed consideration before it is given to allocation. Furthermore, with respect to (1), the EDDC Site Allocation Report for Whimble states 'Whimble is a 'Tier 4' settlement, where the draft local plan seeks to promote limited development to meet local needs. A recent assessment has identified a local need for 4 affordable homes in the next 5 years. The development of up to 180 dwellings on Whim_08 is considered to be excessively high in relation to the scale of the existing village and local needs. In addition, with respect to (3), the EDDC Emerging Local Plan Policy OL05: Green Wedges states 'Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.' The site is within the green wedge and its development would lead to settlement coalescence between Whimble and Cranbrook.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The site is not appropriate for development as set out in response to the previous questions and its allocation goes against the professional judgement of the Planning officers. The development would be better placed elsewhere in Whimble or in Cranbrook or elsewhere where there is appropriate infrastructure – especially with respect to roads/ footpaths – for example, the Cobdens expansion of Cranbrook and also, the site east of Church Road close to the established infrastructure near the Hand and Pen.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: My assumption is that it is compliant.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Paul Ashley Waite

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We fully endorse the Whimble Parish Council response to these proposals on the grounds of soundness. In addition to the points made by the Parish Council, we would also like to add the following: 1/ Pedestrian access: this will not only impact on the residents of the proposed new properties, but will also significantly increase the risks to all pedestrians due to the extra volume of traffic that will be generated within the village. 2/ Parking: the proposed development of 50 houses will likely require space for 75+ additional vehicles. Unless there is specific allocation within the development itself, there is no obvious space for these additional vehicles within the village. 3/ There will presumably be an increase in demand for bus services into Exeter. These can only be accessed at Hand and Pen and requires about a mile walk along a narrow, winding, unlit, and un-paved stretch of Church Road. This is unsafe. 4/ We live in Webbers Close which is to the north of the proposed development and sits at a lower level than the proposed site, adjacent to the stream. This area has previously been identified as a potential flood risk, so the construction of 50 dwellings above the level of Webbers Close would likely increase this risk.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We again endorse

Whimble Parish Council's response to this question. The main improvements required to address our additional issues would be improved pedestrian facilities on Church Road, including paving and lighting, additional parking facilities, potentially as part of the new development, e.g. additional village car park, bus routes extended into Whimble Village and reassurances of measures proposed to alleviate the raised risk of flooding to Webbers Close.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Neal Ward

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This site sits on a green wedge that is within the current adopted local plan. I was not pointed out at consultation stage that proposed site Whimple 08 was on the agreed Green Wedge. This Green Wedge was put in place to prevent coalescence between Whimple and Cranbrook. Allowing development on Green Wedges contravenes the current adopted plan and NPPF section 13. The area of this Green Wedge has also been altered without any consultation.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Whimple 08 should not and should never have been considered due to it being on a Green Wedge. It should have been refused at the first site investigation part of the consultation, however at that point the officers dealing with this seemed unaware of the Green Wedge. It goes against the the current adopted local plan and the legislation protecting same. It also contravenes the NPPF.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site on agreed Green Wedge and other parts of the Green Wedge have been altered without any consultation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Whimble 08 as a site for future Development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The council have totally ignored the large amount of public concern re developing on the Green Wedge. They have also ignored the current adopted plan and its contents re developing on Green Wedges. A/ Development on a green wedge would start the coalescence of Whimble to Cranbrook and once the precedence is set there is nothing stopping the rest of the green wedge being developed on. Contravenes Strategy 7/8 re coalescence in current local plan 2013 to 2031. Policy 78 Green Wedges, page 243 proposed local plan. B/ Removal of the historic orchard and destruction of natural habitat contravenes Strategy 47 and policies D1, D2, D3, ENG of the current local plan 2013 to 2031. It also contravenes the proposed local plan policies 84,85 & 86.

Based on the above supportive and significant evidence I request that site Whim_08 is removed from the proposed local plan and in no way included in the adopted plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sally Elizabeth Wilde

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: I

wish to object to the following part of the EDDC Emerging Local Plan Consultation is, as follows: I am challenging policy SD29: Strategic Allocations in Whimble, particularly to the allocation of Whim_08a (Land west of Bramley Gardens) site in the EDDC Emerging Local Plan. The objection is on the grounds of soundness in that the allocation and policy is not based on solid evidence. The EDDC Strategic Planning Committee considered the Whimble Site Selection Report at a meeting on 1 October 2024. Professional planning officers identified and assessed the potential sites in Whimble and using their professional judgement, backed up with sound evidence recommended to Members whether to allocate the site or not. In the case of Whim_08 site, officers recommended that the site was not allocated for the following reasons:

- Scale of development incompatible with spatial strategy.
- Site lacks safe and convenient pedestrian access to services and facilities in the village.
- The site forms part of the 'Green Wedge' between Whimble and Cranbrook.
- Forms an important part of the very attractive rural landscape setting for the settlement.
- Potential impact on unconfirmed wildlife site.
- Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation. In the earlier phases on consultation, Planning Officers held a Public Consultation event at the Victory Hall, Whimble. This site was never considered as being appropriate for development at that event and, in fact, when local residents asked the question, the Officers in attendance vehemently denied that it was a possibility for consideration. At the meeting on 1 October 2024, Members of the committee voted to go with the officer

recommendation and not allocate the site. However, at the Strategic Planning Committee meeting on 1 November 2024 Members did a complete u turn and decided to allocate part of the site, contrary to Officer recommendation. There was no justification or reason given as to why this site was picked above any others in Whimble or other sites in the east Devon area. Also no additional work appears to have been completed by officers to assess the risks relating to this site before allocating it. This gives the appearance of the Strategic Planning Committee having a knee jerk reaction to needing to allocate additional houses across the district without considering a fully worked up proposal or sound justification (based on evidence and facts), as to why the site should be allocated (partially or otherwise). This site allocation report also considers 'If whole site is not suitable for allocation, could a smaller part be allocated?' The view of the professional planning officers was 'No'. Again, this leads me to challenge the soundness of any allocation of this site, whether full or partial. Taking the list of reasons drawn up by officers as to why the site should not be allocated, I would like to make the following comments: Scale of development incompatible with spatial strategy. Policy SP01: Spatial Strategy section E states 'Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.' The EDDC Site Allocation Report for Whimble states 'Whimble is a is a 'Tier 4' settlement, where the draft local pan seeks to promote limited development to meet local needs. The development of up to 180 dwellings on Whim_08 is considered to be excessively high in relation to the scale of the existing village. As part of the work on the Whimble Neighbourhood Plan, our Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states 'The survey identified a need for at least 4 affordable homes within the next 5 years.' I do not class a total allocation of 83 homes in Whimble to be 'limited development' (Whim_11 total of 33 homes; Whim_08a total of 50 homes), especially when the Whimble Housing Needs Report lists a significantly lower figure. I also suggest that the allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01: Housing to address needs, which states 'This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.' In addition to this, there are developments planned in neighbouring areas e.g. Cranbrook. This includes the current Cobdens Expansion of Cranbrook, part of which is still in the Whimble Parish Area, where 1500 houses, a school and a travellers site have already been approved by the Strategic Planning Committee. These sites have a far better infrastructure than Whimble Village so why has the additional housing requirement not been allocated at these sites? Site lacks safe and convenient pedestrian access to services and facilities in the village. Access to

the site and potential development would be through Bramley Gardens and onto Church Road. Church Road is the main route into the Village and is a narrow and dangerous road. The section of Church Road nearest to the Square and village shop is single track road with houses either side of the road. There is no pavement along the stretch of Church Road to The Square and School Hill. Whimble Parish Council and Villagers have raised concerns about the volume and speed of traffic on that road. There is so much concern about the volume and speed of traffic along Church Road that Whimble Parish Council has convened a Community Speed Watch Group to monitor the traffic and speed along that road. The Police confirmed that Church Road is not recommended as a safe route to the Primary School, Village shop, church or railway station. To access the village shop in the Square and the Primary School in School Hill villagers would have to walk down Church Road which has no pavements. Therefore, there is no safe and convenient pedestrian access to services and facilities in the village. To ensure safety most people would probably use their car or vehicle to access the village shop or primary school. This is not sustainable and surely would be against EDDC Emerging Local Plan Policy TR01: prioritising walking, wheeling, cycling and public transport and is also contrary to the EDDC Climate Change aspirations. The site forms part of the 'Green Wedge' between Whimble and Cranbrook. The EDDC Emerging Local Plan Policy OL05: Green Wedges states 'Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.' I challenge the soundness of the proposed allocation, due to the Green Wedge. The Allocation of this site would potentially damage the individual character or identity of Whimble. This site forms an important part of the very attractive rural landscape setting for the settlement. This would also lead to settlement coalescence between Whimble and Cranbrook, which is a material planning issue, and clearly demonstrates that this site should not be allocated in the Local Plan. This was the view of the EDDC professional Planning Officers. Potential impact on unconfirmed wildlife site. This a wildlife site which is home to bats, owls, woodpeckers, deer and badgers. Any development of this site would be contrary to EDDC Emerging Local Plan Policy PB03: protection of irreplaceable habitats and important features. Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation. There is no evidence to suggest that officers have carried out further work relating to the flood risk before consideration was given to a partial allocation. Therefore, I suggest that there is no sound evidence for allocating this site in the EDDC Emerging Local Plan and that it is contrary to Policy AR01: Flooding. Other comments The residents in Whimble have not said that they are against development. But the issue is the size and location of the development. It is my view that development would be better placed in Cranbrook or elsewhere in the district where there is appropriate infrastructure. As set out earlier there is no sound

justification as to why the Strategic Planning Committee decided to go against the professional judgement of the Planning Officers and allocated this site in the Emerging Local Plan. Also, in terms of soundness, the Strategic Planning Committee does not appear to have fully considered a number of other options that could have been chosen. I believe Whimble Parish Council is looking at Site Allocations as part of the evidence base for its Neighbourhood Plan. The Parish Council is considering a number of sites, which are: Whim_03 Land to the south of Grove Road Whim_07 Land south of Broadclyst Road Whim_13 Land north side of Grove Road Whim_18 Land to the east of Church Road Whim_20 Land to the north of Plumtree Lane My preference would be that a site is allocated to the east of Church Road so that it is nearer to the established infrastructure near the Hand and Pen. It is appreciated that there are constraints to these sites but I challenge that there are constraints with site Whim_08a, hence why the EDDC professional Planning Officers recommended that the site was not allocated. It is my view that further work should be carried out on all of the sites by the professional Planning Officers before any allocation is made in Whimble. Summary I believe that Policy SD29: Strategic Allocations for Whimble, specifically site Whim_08a is not sound, as the decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made to partially allocate the site. Therefore I demand to see the modification of site Whim_08a being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the district (outside of Whimble Village), where there is appropriate infrastructure.

Full name: Simon Young

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: For the land at Whim11 at Station Rd, it is suggested that it will be possible to extend a footpath behind the hedgerow, coming out opposite The Withey. This would not be possible as the land opposite The Withey entrance belongs to Slewton House, which I own, and is not available for sale or development. This would mean that any idea of extending a footway along adjacent to Talaton Rd as far as The Withey entrance would not be a possible outcome of any development.

In addition, for both developments in Whimble the number of proposed houses is too great for the village. Most of the roads are single track and extra traffic would pose a danger to pedestrians and gridlock along the narrow roads.

Both sites are precious for wildlife and vital for the habitat of rare species. Once built upon they would be lost forever, permanently putting further pressure on vanishing insect life, birds and mammals.

Both sites are precious to the villagers. One is the old cricket pitch and the other an ancient orchard. They are historically important and no one wants extra houses on either site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The suggestion of a footpath at the Whim11 site should be removed as it is not possible . Any idea of a a footpath being an advantage to the village is erroneous.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Andrea Young

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Yes but I do not agree with the proposal

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Both proposed developments in Whimble would put extreme pressure on the village. There is a single track road which is the direct route between the two sides of the railway line. There is only pavement in parts and the village school is on the route. Additional traffic on the road would lead to gridlock and danger to pedestrians.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Whilst I appreciate the pressures from central government, further development in Whimble is inappropriate. The roads are too narrow for flow of traffic with the main route north/south along Church Rd, Broadway, School Hill being largely single track with a blind bend by the church, with no continuous pavement. It would be very unsafe to introduce additional vehicles and an increase of 83 houses within the village would lead to hundreds of new vehicle movements a day, leading to gridlock and accidents on roads not designed to cope with traffic.

Both sites are havens for wildlife. Both are hunting grounds for the large population of owls, woodpeckers, tree creepers and other birds which nest in the trees nearby and in the TPO trees. Bats are also present at both sites. The eco systems are extremely precious and once lost would be gone forever, leading to collapse of local populations of protected species. The locals do not support this.

There are flooding problems already within the village. Cranny Brook floods in heavy rain and additional areas of tarmac would exacerbate the problems. As climate change takes place things will become worse without additional stress on lower areas of the village, which risk flooded homes and danger to life in floodwaters.

The local infrastructure is inadequate for these levels of development. We have an inadequate sewerage system already cannot cope in high rainfall. The roads are unsuitable and additional traffic will lead to accidents. A pleasant village would be ruined.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the proposed development areas Whim011 and Whim08 as the village cannot support such large development without danger to life and an ecological crisis.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Both sites in Whimble have already been considered by planning officers as being unsuitable for development. The parish council does not support this. The locals do not agree. The planning authority is not taking into account local wishes.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Amy Tregellas

Organisation (where relevant): Whimble Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Whimble Parish Council is responding to, and challenging policy SD29: Strategic Allocations in Whimble, particularly to the allocation of Whim_11 (Land at Station Road) site in the EDDC Emerging Local Plan.

The objection is on the grounds of soundness in that the allocation and policy is not based on solid evidence.

The EDDC Strategic Planning Committee considered the Whimble Site Selection Report at a meeting on 1 October 2024.

Professional planning officers identified and assessed the potential sites in Whimble and using their professional judgement, backed up with sound evidence recommended to Members whether to allocate the site or not.

In the case of Whim_11, Planning Officers recommended that the site be allocated for the following reason:

‘The site is considered to be the best option for accommodating an appropriate scale of development for Whimble. It is well related to the exiting settlement pattern and benefits from relatively good pedestrian access to facilities in the village centre. Although the northern part of the site is at risk of flooding, there is potential for the development of around 30 dwellings on the remainder of the site.’

Representatives from Whimble Parish Council were not able to attend the Strategic Planning Committee on 1 October 2024, but instead submitted a statement, which was read out by a Democratic Services Officer.

The Whim_11 site in Station Road (which is also known locally as the old cricket ground) has been put forward for development several times before when East Devon District Council (EDDC) have called for sites. In the 1995, 1999 and 2015 Local Plans the proposed site was rejected on several legitimate planning grounds and the site was not allocated in the Local Plan.

The Parish Council asked the Strategic Planning Committee to give an explanation as to what has changed since this site was previously rejected that now makes it suitable for allocation. To date, no response has been received from EDDC.

Trees and Wildlife Habitat

The site contains a number of mature trees several of which have existing Tree Preservation Orders (TPOs). The tree in middle of old cricket pitch is unique, mentioned in Wisden and should be preserved as of historic importance.

In the EDDC Site Selection Report for Whimble, there does not appear to be any mention of the tree in the middle of the old cricket pitch and allocation on this site would surely be subject to the provision of EDDC Emerging Local Plan Policy PB08: Trees, Hedges and Woodland on development site.

The DEFRA website shows the site and north east of the site as Woodland Priority Habitat and Woodland Improvement Area, Priority Habitat (woodland and orchard), and a national habitat and network enhancement zone 1.

Local knowledge is that the site is home to an array of wildlife habitats including bats and owls.

Any development of this site would be contrary to the EDDC Emerging Local Plan Policies PB02: protection of regionally and locally important wildlife sites and PB03: protection of irreplaceable habitats and important features.

Flooding

It is noted that the site is already subject to (partial) flooding (confirmed by the Environment Agency), and any development would run the risk of adding to this with impact both on the site and further downstream.

There is no evidence to suggest that officers have carried out further work relating to the flood risk before consideration was given to a partial allocation.

Therefore, Whimble Parish Council suggests that there is no sound evidence for allocating this site in the EDDC Emerging Local Plan and that it is contrary to Policy AR01: Flooding.

Access to the site and Infrastructure

The exit from the site is on to a single track road with a blind corner – not only would this create an immediate local problem but the potential to add 33 houses on this site would seriously compromise an already congested and busy exit route from the village (continuing through the Centre of the village – along Church Road and then on to the old London Road.

Church Road is the main route into the Village and is a narrow and dangerous road. The section of Church Road nearest to the Square and village shop is single track road with houses either side of the road.

There is no pavement along the stretch of Church Road to The Square and School Hill. The Parish Council and Villagers have raised concerns about the volume and speed of traffic on that road.

The Parish Council are so concerned about the volume and speed of traffic along Church Road that it has convened a Community Speed Watch Group to monitor the traffic and speed along that road.

The Police confirmed that Church Road is not recommended as a safe route to the Primary School, Village shop, church or railway station.

There is no capacity to add a footpath to exit and continue from this site. All access routes are narrow country lanes, so development would exacerbate the existing problems of public safety (given the lack of footpath), traffic congestion and noise.

This site was considered unsuitable for development in 1995 due to traffic issues. What has changed since then which now makes this site suitable? This question was asked at the EDDC Strategic Planning Committee meeting on 1 October 2024 but, to date, no response has been received.

The Parish Council has been advised that the owners of the site do not own the hedge bordering the site. Also, another local resident owns land adjacent to the site that would be needed for the installation of a footpath, and he has advised that he will resist any land grab.

Whimble Primary School is at capacity so there is no infrastructure in place to accommodate additional children at the school arising from 83 additional homes split across the proposed allocations of Whim_11 and Whim_08a.

Whimble Parish Council feels that this site is not sustainable and therefore should not be allocated in the EDDC Emerging Local Plan.

Land of Local Importance

In 1993 The EDDC Chief Engineer and Planning Officer wrote to a local resident to confirm that the Richard Whiteway Memorial Ground was inset as “Land of Local Importance” (copy of the letter has been provided). The letter states ‘the intention of the designation is that the land should not be built upon’, and ‘the designation means that the land can only be used for activities which retain its open nature. Any applications to develop the land would be resisted’.

Whimble Parish Council asks what has changed since 1993 to suggest that this site should now be allocated in the Emerging Local Plan? This question was asked to the EDDC Strategic Planning Committee meeting on 1 October 2024 but, to date, no response has been received.

Developing this site would be contrary to Policy OL06: Land of Local Amenity Importance and Local Green Space.

Spatial Strategy

Whimble is a 'Tier 4' settlement, where the draft local plan seeks to promote limited development to meet local needs. The development of up to around 33 homes on Whim_11 is consistent with that strategy.

Whimble Parish Council challenges this assumption.

As part of the work on the Whimble Neighbourhood Plan, the Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states ‘The survey identified a need for at least 4 affordable homes within the next 5 years.’

Whimble Parish Council does not class a total allocation of 83 homes in Whimble to be ‘limited development’ (Whim_11 total of 33 homes; Whim_08a total of 50 homes), especially when the Whimble Housing Needs Report lists a significantly lower figure.

The Parish Council also suggests that the allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01: Housing to address needs, which states ‘This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.’

In addition to this, there are developments planned in neighbouring areas e.g. Cranbrook. This includes the current Cobdens Expansion of Cranbrook, part of which is still in the Whimble Parish Area, where 1500 houses, a school and a travellers site have already been approved by the Strategic Planning Committee. These sites have a far better infrastructure than Whimble Village so why has the additional housing requirement not been allocated at these sites?

Other Comments

The Parish Council and local residents in Whimble have not said that they are against development. But the issue is the size and location of the development.

It is the view of the Parish Council that development would be better placed elsewhere in Whimble, or in Cranbrook or elsewhere in the district where there is appropriate infrastructure.

As set out earlier there is no sound justification as to why the Strategic Planning Committee decided to go against the professional judgement of the Planning Officers and allocated this site in the Emerging Local Plan.

Also, in terms of soundness, the Strategic Planning Committee does not appear to have fully considered a number of other options that could have been chosen.

Whimble Parish Council is looking at Site Allocations as part of the evidence base for its Neighbourhood Plan. The Parish Council is considering a number of sites, which are:

Whim_03 Land to the south of Grove Road Whim_07 Land south of Broadclyst Road
Whim_13 Land north side of Grove Road Whim_18 Land to the east of Church Road
Whim_20 Land to the north of Plumtree Lane

The Parish Council's preference would be that a site is allocated to the east of Church Road so that it is nearer to the established infrastructure near the Hand and Pen.

It is the view of the Parish Council that further work should be carried out on all of the sites by the professional Planning Officers before any allocation is made in Whimble.

So, in summary, Whimble Parish Council does not feel that the EDDC Emerging Local Plan policy SD29: Strategic Allocations in Whimble is sound, and therefore site Whim_11 should not be allocated.

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.: Whimble Parish

Council believes that policy SD29: Strategic Allocations for Whimble, specifically site Whim_11 is not sound, as the decision to allocate failed to consider the protected tree in the middle of the site, which is protected by a Tree Preservation Order (TPO). Also there is no mention of the fact that previously the EDDC Planning Department designated this site as “Land of Local Importance” which should not be built on and should be used for activities which retain its open nature.

Therefore, Whimble Parish Council and local residents want to see the modification of site Whim_11 being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the district (outside of Whimble Village), where there is appropriate infrastructure.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Whimble Parish Council wishes to participate in the hearing session(s) to challenge the soundness of the allocation of Policy SD29: Strategic Allocations at Whimble, and to represent local residents of Whimble who have also voiced significant concerns and objections.

Full name: Amy Tregellas

Organisation (where relevant): Whimble Parish Council

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Whimble Parish Council is responding to, and challenging policy SD29: Strategic Allocations in Whimble, particularly to the allocation of Whim_08a (Land west of Bramley Gardens) site in the EDDC Emerging Local Plan.

The objection is on the grounds of soundness in that the allocation and policy is not based on solid evidence.

The EDDC Strategic Planning Committee considered the Whimble Site Selection Report at a meeting on 1 October 2024.

Professional planning officers identified and assessed the potential sites in Whimble and using their professional judgement, backed up with sound evidence recommended to Members whether to allocate the site or not.

In the case of Whim_08 site, officers recommended that the site was not allocated for the following reasons:

- Scale of development incompatible with spatial strategy.
- Site lacks safe and convenient pedestrian access to services and facilities in the village.
- The site forms part of the ‘Green Wedge’ between Whimble and Cranbrook.
- Forms an important part of the very attractive rural landscape setting for the settlement.
- Potential impact on unconfirmed wildlife site.
- Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation.

In the earlier phases on consultation, Planning Officers held a Public Consultation event at the Victory Hall, Whimble. This site was never considered as being appropriate for development at that event and, in fact, when local residents asked the question, the Officers in attendance vehemently denied that it was a possibility for consideration.

At the meeting on 1 October 2024, Members of the committee voted to go with the officer recommendation and not allocate the site. However, at the Strategic Planning Committee meeting on 1 November 2024 Members did a complete u turn and decided to allocate part of the site, contrary to Officer recommendation.

There was no justification or reason given as to why this site was picked above any others in Whimble or other sites in the east Devon area. Also no additional work appears to have been completed by officers to assess the risks relating to this site before allocating it.

This gives the appearance of the Strategic Planning Committee having a knee jerk reaction to needing to allocate additional houses across the district without considering a fully worked up proposal or sound justification (based on evidence and facts), as to why the site should be allocated (partially or otherwise).

This site allocation report also considers ‘If whole site is not suitable for allocation, could a smaller part be allocated?’ The view of the professional planning officers was ‘No’. Again, this leads Whimble Parish Council to challenge the soundness of any allocation of this site, whether full or partial.

Taking the list of reasons drawn up by officers as to why the site should not be allocated, Whimble Parish Council makes the following comments:

Scale of development incompatible with spatial strategy.

Policy SP01: Spatial Strategy section E states ‘Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.’

The EDDC Site Allocation Report for Whimble states ‘Whimble is a is a 'Tier 4' settlement, where the draft local pan seeks to promote limited development to meet local needs. The development of up to 180 dwellings on Whim_08 is considered to be excessively high in relation to the scale of the existing village.

As part of the work on the Whimble Neighbourhood Plan, the Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states ‘The survey identified a need for at least 4 affordable homes within the next 5 years.’

Whimble Parish Council does not class a total allocation of 83 homes in Whimble to be ‘limited development’ (Whim_11 total of 33 homes; Whim_08a total of 50 homes), especially when the Whimble Housing Needs Report lists a significantly lower figure.

The Parish Council also suggests that the allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01: Housing to address needs, which states ‘This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.’

In addition to this, there are developments planned in neighbouring areas e.g. Cranbrook. This includes the current Cobdens Expansion of Cranbrook, part of which is still in the Whimble Parish Area, where 1500 houses, a school and a travellers site have already been approved by the Strategic Planning Committee. These sites have a far better infrastructure than Whimble Village so why has the additional housing requirement not been allocated at these sites?

Site lacks safe and convenient pedestrian access to services and facilities in the village.

Access to the site and potential development would be through Bramley Gardens and onto Church Road. Church Road is the main route into the Village and is a narrow and dangerous road.

The section of Church Road nearest to the Square and village shop is single track road with houses either side of the road. There is no pavement along the stretch of Church Road to The Square and School Hill. The Parish Council and Villagers have raised concerns about the volume and speed of traffic on that road.

The Parish Council are so concerned about the volume and speed of traffic along Church Road that it has convened a Community Speed Watch Group to monitor the traffic and speed along that road. The Police confirmed that Church Road is not recommended as a safe route to the Primary School, Village shop, church or railway station.

To access the village shop in the Square and the Primary School in School Hill villagers would have to walk down Church Road which has no pavements. Therefore, there is no safe and convenient pedestrian access to services and facilities in the village.

To ensure safety most people would probably use their car or vehicle to access the village shop or primary school. This is not sustainable and surely would be against EDDC Emerging Local Plan Policy TR01: prioritising walking, wheeling, cycling and public transport and is also contrary to the EDDC Climate Change aspirations.

The site forms part of the ‘Green Wedge’ between Whimble and Cranbrook.

The EDDC Emerging Local Plan Policy OL05: Green Wedges states ‘Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.’

Whimble Parish Council again challenges the soundness of the proposed allocation due to the Green Wedge. The Allocation of this site would potentially damage the individual character or identity of Whimble. This site forms an important part of the very attractive rural landscape setting for the settlement.

This would also lead to settlement coalescence between Whimble and Cranbrook, which is a material planning issue, and clearly demonstrates that this site should not be allocated in the Local Plan. This was the view of the EDDC professional Planning Officers.

Potential impact on unconfirmed wildlife site.

Local residents have stated that this site is a wildlife site which is home to bats, owls, woodpeckers, deer and badgers. Any development of this site would be contrary to EDDC Emerging Local Plan Policy PB03: protection of irreplaceable habitats and important features.

Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation.

There is no evidence to suggest that officers have carried out further work relating to the flood risk before consideration was given to a partial allocation. Therefore, Whimble Parish Council suggests that there is no sound evidence for allocating this site in the EDDC Emerging Local Plan and that it is contrary to Policy AR01: Flooding.

Other comments

The Parish Council and local residents in Whimble have not said that they are against development. But the issue is the size and location of the development.

It is the view of the Parish Council that development would be better placed elsewhere in Whimble, or in Cranbrook or elsewhere in the district where there is appropriate infrastructure.

As set out earlier there is no sound justification as to why the Strategic Planning Committee decided to go against the professional judgement of the Planning Officers and allocated this site in the Emerging Local Plan.

Also, in terms of soundness, the Strategic Planning Committee does not appear to have fully considered a number of other options that could have been chosen.

Whimble Parish Council is looking at Site Allocations as part of the evidence base for its Neighbourhood Plan. The Parish Council is considering a number of sites, which are:
Whim_03 Land to the south of Grove Road
Whim_07 Land south of Broadclyst Road
Whim_13 Land north side of Grove Road
Whim_18 Land to the east of Church Road
Whim_20 Land to the north of Plumtree Lane

The Parish Council's preference would be that a site is allocated to the east of Church Road so that it is nearer to the established infrastructure near the Hand and Pen.

It is appreciated that there are constraints to these sites but the Parish Council challenges that there are constraints with site Whim_08a, hence why the EDDC professional Planning Officers recommended that the site was not allocated.

It is the view of the Parish Council that further work should be carried out on all of the sites by the professional Planning Officers before any allocation is made in Whimble.

So, in summary, Whimble Parish Council does not feel that the EDDC Emerging Local Plan policy SD29: Strategic Allocations in Whimble is sound, and therefore site Whim_08a should not be allocated.

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.: Whimble Parish Council believes that policy SD29: Strategic Allocations for Whimble, specifically site Whim_08a is not sound, as the decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made to partially allocate the site.

Therefore, Whimble Parish Council and local residents want to see the modification of site Whim_08a being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the District (outside of Whimble Village), where there is appropriate infrastructure.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Whimble Parish Council wishes to participate in the hearing session(s) to challenge the soundness of the allocation of Policy SD29: Strategic Allocations at Whimble, and to represent local residents of Whimble who have also voiced significant concerns and objections.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land at Station Road (Whim_11) - this policy suggests that an FRA 'may' be required, but it may be more proactive to state the 'where a development cannot locate development outside of the area at risk for flooding (over the lifetime of development) an FRA will be required. The policy indicates that the site layout should enable convenient pedestrian and cycle links which is supported. However, the priority should be to avoid the areas of flood risk where possible, alongside sustainable links. As stated in SD09, we would encourage the policy to prevent gardens and other domestic features within the area of flood risk.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Whim_11: We request an adjustment to this policy for clarity and to ensure it is consistent with national policies for the conservation of heritage assets.

Whim_08a: The Historic Environment Record also identifies a structure of unknown date and function within the site that is not discussed by the site assessment report. Should pre-commencement archaeological assessment therefore be specified for site Whim_08?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Whim_11: “Careful attention should be paid to conserving and enhancing the setting of Slewton House, a Grade II listed building, including through appropriate building heights, layout and landscaping.”

Whim_08a: Consider introducing requirement for pre-commencement archaeological assessment.