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First Regulation 19 Consultation – East Devon Local Plan – Anonymous Responses

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1.1

Proposal:

1. Introduction

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

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

1.1

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: We would like to use this opportunity to highlight the successful proven track record that Community Land Trusts (CLTs) have in delivering affordable housing for local people. The Council may find it insightful to know that a number of the SWHAPC Housing Associations have delivered significant levels of affordable housing through partnerships with CLTs across the south of England. Therefore, it would be particularly useful if the Local Plan acknowledges this working relationship in order to encourage commitment in the Local Plan to support CLTs in their choice of sites.

Proposal:

1. Introduction

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

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

1.1

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

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: There is little or no mention across any of the areas in the report about ensuring all infrastrucure will be provided

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: I refer to a need for Roads/ transport Schools Doctors/ hospitals Water provision Sewage treatment

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

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

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: See above. Where and how will envirnmental compliance be guaranteed, and infrastructure supplied

1.11

Proposal:

1. Introduction

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

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

1.11

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: The current Exmourh neighbourhood plan that was agreed by the community and implemented in 2019 has not been used in creating this document. If so there would be no potential development in the National Lsndscape, Exmo_17 which is outside the agreed BUAB.

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

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

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: Current neighbourhood plans have not been recognised in guiding this document.

Policies Map

Proposal:

1. Introduction

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

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

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

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

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

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

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

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

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

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

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

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

5. The only outcome of the proposed settlement boundary change is to change a smooth and soft settlement boundary into a crude, irregular penetration into the countryside. The enabling of infill housing will eviscerate the heritage protections in the made Neighbourhood Plan and result in the obliteration of the unique “sense of place”

that currently exists in Bystock Village. It will also irrevocably destroy the original spatial and architectural integrity that currently surrounds the Grade 2 listed Bystock Court.

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

The outcome would be wholly consistent with the LP settlement boundary criteria and new LP Spatial Strategy; it would follow NPPF requirements; would be aligned with draft Strategic Polices 05 and 06; would be consistent with draft Heritage policies in the LP; would leave ENP heritage protection policies undiminished and leaves a wholly clear planning policy position that has already been specifically validated by previous Planning Inspectorate decisions.

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

Unspecified

Proposal:

1. Introduction

2. Do you consider that this part of the Introduction chapter is legally compliant?: Yes

3. Do you consider that this part of the Introduction chapter is sound?: Yes

DS02

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

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

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

The requirement for a design code for all major residential developments is excessive.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: "Major" should be specifically defined in this context as generally it refers to residential schemes of over 10 dwellings.

Supporting paragraph 10.11 refers to NPPF paragraphs 123 to 130. This should be amended to 124 to 130.

The policy should also refer to a source of guidance on the expected scope and content of Design Codes, for clarity.

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

DS04

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS04

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

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: Green Infrastructure provision is an important consideration for new housing developments. However, it is understood that Natural England's 5 Green Infrastructure Principles are meant for a strategic level and not individual sites. The link in Footnote 63 takes you the Natural England document which confirms this. Guidance which is relevant to green and blue infrastructure provision and design at development site level is required.

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

TR02

Proposal: 11. Sustainable Transport and Communications

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

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

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not legally compliant. Please be as precise as possible.: No mention of developing Cycle path from Feniton to Ottery Sy Mary and Sidmouth. Mentions passing loop between Cranbrook and Honiton but this needs to be in place before any further building in Feniton.

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

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

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: as above

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

4(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications 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)

OL05

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL05

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

2(a). If yes, and you wish to support the legal compliance of this part of the Our Outstanding Landscape chapter, please use this box to set out your comments.:
Protect green wedges - do not allow development on these spaces!

PB05

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

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

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: [Tetlow King Planning represents the South West Housing Association Planning Consortium (SWHAPC) which includes leading Housing Associations (HAs) across the South West]

Draft Strategic Policy PB05: Biodiversity Net Gain Draft Policy PB05 states that "Major development proposals will need to deliver biodiversity net gain (BNG) of at least 20% to be calculated using the most up-to-date statutory metric". Currently, the SHWAPC disagrees that a higher than 10% requirement for BNG should be sought as there is significant concern that an increased BNG requirement may reduce the delivery of affordable housing across East Devon. If the Council is looking to introduce a higher threshold than 10%, this must be robustly viability tested to show that it will be viable for applicants to provide such BNG alongside development. The PPG guidance specifies that: "Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented." (Paragraph: 006 Reference ID: 74-006-20240214)

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

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

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

The requirement for all major housing developments of 10 or more homes to deliver a BNG of at least 20% is onerous and will add costs to developments. All developments should only be required to deliver the national minimum requirement of 10% BNG. The provision of in excess of 10% BNG is a benefit of development that can be weighed in the planning balance, and many developments will seek to achieve this where possible, but this should not be translated into a policy requirement.

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

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: Draft Policy PB05 states that "Major development proposals will need to deliver biodiversity net gain (BNG) of at least 20% to be calculated using the most up-to-date statutory metric". Currently, the SHWAPC disagrees that a higher than 10% requirement for BNG should be sought as there is significant concern that an increased BNG requirement may reduce the delivery of affordable housing across East Devon. If the Council is looking to introduce a higher threshold than 10%, this must be robustly viability tested to show that it will be viable for applicants to provide such BNG alongside development. The PPG guidance specifies that:

"Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented."

(Paragraph: 006 Reference ID: 74-006-20240214)

PB07

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB07

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

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

Objection is raised to this policy as it is overly prescriptive and unnecessary. The need for ecological enhancement features in each case should be informed by the site-specific ecological appraisal reports submitted with any planning application. These reports confirm the habitats existing on and around the site and the presence or otherwise of protected species. Specific mitigation and enhancement measures are identified in these reports. Blanket minimum policy requirements could add to development costs without necessarily delivering biodiversity enhancements.

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

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

PB08

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB08

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

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

This policy, spanning three pages, is overly prescriptive and detailed, and may have the unintended harmful consequence of encouraging tree removals in advance of development proposals being prepared.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy should be reduced in length and simplified, perhaps linked to an SPD.

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

OS02

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.: It is not clear what the "Fields in Trust derived standards" means. In any event, the policy's requirements are overly prescriptive. For example, requiring all sites of 300+ dwellings to provide all open space typologies on site including playing pitches will significantly reduce the net development capacity of allocated sites and introduce additional substantial costs, not just for laying out pitches but also for providing parking and changing facilities. It should be clear that financial contributions in lieu of direct provision are equally acceptable and that larger sports provision such as playing pitches should be provided in locations that most meet identified needs for such facilities. The "Additional requirements for residential developments over 200 dwellings" may be difficult to comply with in the circumstances of every development site and may lead to otherwise acceptable planning applications stalling or being refused.

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

HE01

Proposal: 15. Our Outstanding Historic Environment

1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HE01

3(b). If no, please give details of why you consider this part of the Our Outstanding Historic Environment chapter is not sound. Please be as precise as possible.: Draft Policy HE01 outlines the strategic policy for conserving and enhancing non-designated heritage assets. The SWHAPC notes that the heritage policy must be consistent with national policy. At present, the draft policy outlines that "Development proposals that directly or indirectly affect the significance of a non-designated heritage asset will be determined with regard to the scale of any harm or loss and the significance of the asset".

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Historic Environment chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Historic Environment chapter sound. It will be 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 SWHAPC considers that this draft Policy goes beyond the requirements of the NPPF, which only refers to designated heritage assets.

CF01

Proposal: 16. Community Facilities

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

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

2(b). If no, please give details of why you consider this part of the Community Facilities chapter is not legally compliant. Please be as precise as possible.: There is no reference to infrastructure such as schools/health/hospitals/water supplies & sewage treatments

2(c). Please set out the modification(s) you consider necessary to make this part of the Community Facilities chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Community Facilities chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Should have a section commenting on encouraging service providers to be consulted and ensure they can meet the demands of a ever growing population

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

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

4(b). If no, please give details of why you consider this part of the Community Facilities chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No mention of community infrastructure providers

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

17.1

Proposal: 17. Implementation and Monitoring

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

1(a). Please write down the paragraph or policy number that your representation relates to.: 17.1

3(b). If no, please give details of why you consider this part of the Implementation and Monitoring chapter is not sound. Please be as precise as possible.: We would like the Local Plan to acknowledge further the role of Housing Associations in providing affordable housing in East Devon. It would be beneficial to see the Council recognise the role of Housing Associations and encourage developers to have early active engagement with Housing Associations in the preparation of planning proposals. Early engagement enables Housing Associations to have an active role in the planning and design of developments to ensure that the development addresses local housing needs and meets the management requirements of SWHAPC members. It is recommended that the Council adds 'Collaboration with Registered Providers' to the delivery mechanisms for Policy H4 in the monitoring section of the draft Local Plan.

Table 1

Proposal:

2. The Vision

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

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

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: I do not believe that Lithium batteried EVs are the best prospect for a sustainable green future over the time period.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: include other future technologies (eg hydrogen cell batteries) in the narrative.

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

Proposal:

2. The Vision

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

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

3. Do you consider that this part of the vision chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: Our client welcomes and share the aims and objectives of the draft Local Plan. A core objective of the Plan is to support business investment and job creation opportunities within East Devon and support a resilient economy. Our client wholly supports this ambition which represents an important step in the right direction, but this must be matched by a robust approach ensuring that development will be viable and hence delivered. The delivery of new development including employment and commercial floorspace will help support mixed and balanced communities, ensuring sustainable growth for all.

SP01

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

This policy proposes a settlement hierarchy as the basis for the distribution of development land allocations which are intended to be proportionate to the scale and function of each settlement. No objection is raised to the proposed settlement hierarchy, which directs growth to the most sustainable locations in accordance with the NPPF.

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

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: In particular (Buckerell Parish Council) notes that the village of Buckerell is not identified as a service village, and it agrees with that assessment. It also notes that no housing numbers have been ascribed to the village. The Parish Council does not wish to challenge the spatial distribution of new homes to the mixture of main centres, new settlements, towns and service villages. The Parish Council fully appreciates the challenges faced by the local plan in providing for an additional 20,909 new homes over the 22 years from 2020 to 2042.

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Seems sensible and sustainable. Main concern is housing provision numbers for the next 20 years, (20,909 homes) but this is dictated by government. Major constraint is district covered by National Landscapes and other designations, leaving only one third of land available for future growth, mainly the western end. The OVA expects that the EDDC will nevertheless also respect the requirements of National Landscapes, National Nature Reserves, SSSIs and other areas recognised for natural environment value in all decisions permitting housing and infrastructure developments.

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: Yes

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

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

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

SP02

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Paragraph 3.10 of the draft Local Plan sets out that the draft Local Plan will target the delivery of 4,477 affordable dwellings from 2020 to 2042 (uplifting on the 4,070 figure to account to for the years 2040 to 2042). This is guided by the most recent housing needs assessment (2022 LHNA) and the SWHAPC is satisfied that an up-to-date housing needs assessment has been used to inform the policy requirements. Further, paragraph 3.11 of the draft document outlines that the Local Plan housing provision follows transitional arrangements set out under the December 2024 redraft of the NPPF: "The new standard method generates an annual average housing number (at February 2025) of 1,188 dwellings. Providing for 80% of this (para 234 of the December 2024 NPPF) generates the annual average housing level of 950.4 new homes, a 22-year plan requirement of 20,909." The SWHAPC is satisfied that the new Local Plan's housing requirement meets the transitional requirements of the NPPF (2024).

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Draft Strategic Policy SP02: Levels of future housing development Draft Strategic Policy SP02 outlines that housing provision will be made for at least 20,909 dwellings (net) to be delivered in the plan area between 2020-2042. The draft policy adds that the housing requirement will be delivered through a stepped trajectory, with an annual target of 850 homes from 2020/21 to 2031/32, increasing to 1,070 homes per year from 2032/33 to 2041/42. Whilst the SWHAPC acknowledge a stepped trajectory can be useful to account for changes in future housing needs, we encourage the annual housing target to be larger earlier on in the period to deal with the pressing need for new homes that is present right now. As of 31st March 2024, there were 6,1951 households on the housing register in East Devon, following a rise in households on the register over the past three years. It is vital that the Council plans to house these people as soon as possible. The supporting text to Draft Strategic Policy SP02 specifies a specific target for affordable housing delivery. However, this figure is not contained within the policy text of Draft Strategic Policy SP02 itself. Consequently, it could be argued that this target figure does not form part of the policy requirement. The SHWAPC recommends that the affordable housing delivery target figure is set out within the text of the policy itself, rather than the supporting text, to ensure that it is viewed as a policy requirement within the Local Plan. Paragraph 3.10 of the draft Local Plan sets out that the draft Local Plan will target the delivery of 4,477 affordable dwellings from 2020 to 2042 (uplifting on the 4,070 figure to account to for the years 2040 to 2042). This is guided by the most recent housing needs assessment (2022 LHNA) and the SWHAPC is satisfied that an up-to-date housing needs assessment has been used to inform the policy requirements. Further, paragraph 3.11 of the draft document outlines that the Local Plan housing provision follows transitional arrangements set out under the December 2024 redraft of the NPPF: “The new standard method generates an annual average housing number (at February 2025) of 1,188 dwellings. Providing for 80% of this (para 234 of the December 2024 NPPF) generates the annual average housing level of 950.4 new homes, a 22-year plan requirement of 20,909.” The SWHAPC is satisfied that the new Local Plan’s housing requirement meets the transitional requirements of the NPPF (2024). The SWHAPC

draw the Council's attention to a typographical error at paragraph 3.12 in which the draft document states that "under a stepped trajectory that will provide an annual average of 850 dwellings per year from 2020/21 to 2031/32 and 1,070 per year from 2032/33 to plan end at 2023/24". It is believed that the latter date in this sentence should read "2041/42" in line with the proposed plan period.

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

This policy proposes to deliver 80% of the district's Standard method requirement of 1,188 dwellings per annum. Over the 22 year plan period, the Standard Method provides a local housing need total requirement for a minimum of 26,136 dwellings. The plan proposes to deliver at least 20,909 dwellings, such that it will under-provide against local housing needs by 5,227 dwellings. The Council's published position is that it currently has a 5 year housing land supply shortfall of 2.97 years. The emerging local plan therefore currently does not provide a solution to delivering the minimum local housing need, so that the current severe housing land supply shortfall will persist at least in the short term. Strategic Policy SP02 outlines a stepped trajectory, setting an annual target of 850 homes from 2020/21 to 2031/2032, which then increases to 1,070 homes per annum from 2032/33 to 2041/42. Objection is raised to this approach, because it places a heavy reliance on housing delivery including from a new settlement (which has yet to be the subject of consultation) in the second half of the plan period. The record of housing delivery from the Cranbrook new settlement evidences that this approach is not justified. The delivery of 850 dwellings per annum for the first 11 years of the plan period, against a planned average of 950 dwellings per annum (which itself only represents 80% of the local housing need) will worsen the local housing crisis.

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

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Paragraph 3.10 of the draft Local Plan sets out that the draft Local Plan will target the delivery of 4,477 affordable dwellings from 2020 to 2042 (uplifting on the 4,070 figure to account to for the years 2040 to 2042). This is guided by the most recent housing needs assessment (2022 LHNA) and the SWHAPC is satisfied that an up-to-date housing needs assessment has been used to inform the policy requirements. Further, paragraph 3.11 of the draft document outlines that the Local Plan housing provision follows transitional arrangements set out under the December 2024 redraft of the NPPF: "The new standard method generates an annual average housing number (at February 2025) of 1,188 dwellings. Providing for 80% of this (para 234 of the December 2024 NPPF) generates the annual average housing level of 950.4 new homes, a 22-year plan requirement of 20,909." The SWHAPC is satisfied that the new Local Plan's housing requirement meets the transitional requirements of the NPPF (2024).

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: The supporting text to Draft Strategic Policy SP02 specifies a specific target for affordable housing delivery. However, this figure is not contained within the policy text of Draft Strategic Policy SP02 itself. Consequently, it could be argued that this target figure does not form part of the policy requirement. The SHWAPC recommends that the affordable housing delivery target figure is set out within the text of the policy itself, rather than the supporting text, to ensure that it is viewed as a policy requirement within the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Draft Strategic Policy SP02 outlines that housing provision will be made for at least 20,909 dwellings (net) to be delivered in the plan area between 2020-2042. The draft policy adds that the housing requirement will be delivered through a stepped trajectory, with an annual target of 850 homes from 2020/21 to 2031/32, increasing to 1,070 homes per year from 2032/33 to 2041/42. Whilst the SWHAPC

acknowledge a stepped trajectory can be useful to account for changes in future housing needs, we encourage the annual housing target to be larger earlier on in the period to deal with the pressing need for new homes that is present right now. As of 31st March 2024, there were 6,1951 households on the housing register in East Devon, following a rise in households on the register over the past three years. It is vital that the Council plans to house these people as soon as possible.

The SWHAPC draw the Council's attention to a typographical error at paragraph 3.12 in which the draft document states that "under a stepped trajectory that will provide an annual average of 850 dwellings per year from 2020/21 to 2031/32 and 1,070 per year from 2032/33 to plan end at 2023/24". It is believed that the latter date in this sentence should read "2041/42" in line with the proposed plan period.

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

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

Paragraph 3.10 of the draft Local Plan sets out that the draft Local Plan will target the delivery of 4,477 affordable dwellings from 2020 to 2042 (uplifting on the 4,070 figure to account to for the years 2040 to 2042). This is guided by the most recent housing needs assessment (2022 LHNA) and the SWHAPC is satisfied that an up-to-date housing needs assessment has been used to inform the policy requirements. Further, paragraph 3.11 of the draft document outlines that the Local Plan housing provision follows transitional arrangements set out under the December 2024 redraft of the NPPF:

"The new standard method generates an annual average housing number (at February 2025) of 1,188 dwellings. Providing for 80% of this (para 234 of the December 2024 NPPF) generates the annual average housing level of 950.4 new homes, a 22-year plan requirement of 20,909."

The SWHAPC is satisfied that the new Local Plan's housing requirement meets the transitional requirements of the NPPF (2024).

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Draft Strategic Policy SP02 outlines that housing provision will be made for at least 20,909 dwellings (net) to be delivered in the plan area between 2020-2042. The draft policy adds that the housing requirement will be delivered through a stepped trajectory, with an annual target of 850 homes from 2020/21 to 2031/32, increasing to 1,070 homes per year from 2032/33 to

2041/42. Whilst the SWHAPC acknowledge a stepped trajectory can be useful to account for changes in future housing needs, we encourage the annual housing target to be larger earlier on in the period to deal with the pressing need for new homes that is present right now. As of 31st March 2024, there were 6,195 households [https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-open-data] on the housing register in East Devon, following a rise in households on the register over the past three years. It is vital that the Council plans to house these people as soon as possible.

The supporting text to Draft Strategic Policy SP02 specifies a specific target for affordable housing delivery. However, this figure is not contained within the policy text of Draft Strategic Policy SP02 itself. Consequently, it could be argued that this target figure does not form part of the policy requirement.

The SWHAPC draw the Council's attention to a typographical error at paragraph 3.12 in which the draft document states that "under a stepped trajectory that will provide an annual average of 850 dwellings per year from 2020/21 to 2031/32 and 1,070 per year from 2032/33 to plan end at 2023/24". It is believed that the latter date in this sentence should read "2041/42" in line with the proposed plan period.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The SHWAPC recommends that the affordable housing delivery target figure is set out within the text of the policy itself, rather than the supporting text, to ensure that it is viewed as a policy requirement within the Local Plan.

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: Yes

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Insufficient infrastructures for this amount of development. Few if any social houses

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I would be more prepared to accept this proposal if there were social housing needs met

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

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

SP03

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP03

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

This policy proposes a minimum housing requirement for each Neighbourhood Designated Area in the district. Given that the plan has been prepared under the transitional arrangements set out in paragraphs 234 – 235 of the NPPF, the proposed Neighbourhood Area housing requirements only plan to meet 80% of local housing need, consistent with draft Strategic Policy SP02. Again, this does not provide a solution to delivering the minimum local housing need. At 100% of its local housing need, the minimum requirement for Feniton would be 159 dwellings.

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

SP07

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP07

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: It is inevitable that this level of housing growth will have an impact on the services being provided by the public sector organisations and the Parish Council stresses the vital importance of ensuring that the necessary infrastructure and expansion of services is provided on a phased basis linked to the construction of the new homes. It particularly wishes to focus on the extra demands which will be imposed on the existing stressed medical facilities and school places in the area. It wishes to support the approach taken in respect of the delivery of infrastructure as set out in Policies SP07 and SP08.

SP08

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP08

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: It is inevitable that this level of housing growth will have an impact on the services being provided by the public sector organisations and the Parish Council stresses the vital importance of ensuring that the necessary infrastructure and expansion of services is provided on a phased basis linked to the construction of the new homes. It particularly wishes to focus on the extra demands which will be imposed on the existing stressed medical facilities and school places in the area. It wishes to support the approach taken in respect of the delivery of infrastructure as set out in Policies SP07 and SP08.

WS01

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: 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)?: No, I do not wish to participate in hearing session(s)

WS11

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: > Following the request for engagement with the Council's local plan, the following are my views on policy WS11 > > This proposal is wholly inappropriate for a number of reasons. > > The previously released' suitability assessment' of the site was staggeringly brief. It read as a 'fait accompli', with the site being justified in retrospect to fit the Council agenda, rather than an independent assessment of suitability. This has the appearance of unfairness and unethical bias. > > The site itself is outside the development area, and is across the road from a similar site which was previously assessed for housing, this was rejected on a number of grounds as being unsuitable. > > The council's own plan recognises that no planning for any other purpose (save for some minor identified associated areas) would be granted - further giving credence to the unsuitable nature of this site for development. > > The access road to this site was made a 'no through road' previously , this being identified as a green route and unsuitable for traffic. This planning application flies in the face of that and is contradictory, inviting further traffic onto this road. This will place pedestrians at greater risk, there are no pavements along this route at all. > > Further, it is identified in your own report that this site is heavily impacted by flooding, rendering a proportion of the site unusable for any residential purpose. How then can the Council assess that this site is suitable for this type of use, given that it is again of a residential nature? > > It appears that this site has not been assessed in good faith, is not suitable for objective reasons, and is being forced through to fulfil a Council agenda rather than because it is right for the area, it's residents, or the proposed residents of the site itself. > > There are myriad areas across East Devon, which may also be in the early stages of development and which don't flood, border noisy transport links or access via green routes frequented by pedestrians.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: > I would strongly request this proposal to be re-assessed and given proper scrutiny.

5.1

Proposal:

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 Adding additional 10s of houses to larger developments should be prioritised over free standing developments of 10s of houses that have a large negative impact on the location chosen. Infrastructure such as community assets, transport etc. can be much better met by making a large development slightly larger (e.g. 40 houses on a plan of 1000 houses), than on many smaller developments especially in small villages with poor infrastructure, and where even a small development can have a large negative impact on the community.

An evaluation of the impact of developments on village communities due to physical factors e.g. flood risks, poor access or human factors such as local amenities, should be conducted and meeting housing needs through larger developments in either brown field or bespoke sites should be prioritised.

Proposal:

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Chapter 5, "Development in the Towns and Villages," is not legally compliant because it allocates development in various towns and villages without demonstrating that the necessary infrastructure, particularly wastewater infrastructure, will be in place to support that development. This contravenes the National Planning Policy Framework (NPPF), which requires local plans to ensure that development is sustainable and that infrastructure needs are addressed. The chapter includes site allocations and development proposals for specific settlements, but it does not provide sufficient evidence of effective cooperation with Southwest Water or a robust plan for delivering the necessary infrastructure upgrades. This lack of assurance about infrastructure delivery, especially concerning wastewater, renders the chapter legally unsound.

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 make Chapter 5 legally compliant, the following modifications are necessary:

Infrastructure Delivery Commitment: Each section detailing development allocations for a specific town or village should include a specific commitment to ensuring that adequate wastewater infrastructure is in place to support the proposed development. Suggested Revised Wording (Example for Exmouth): "Strategic Policy SD01: Exmouth and its development allocations…In addition to the requirements outlined below, all development proposals within Exmouth must demonstrate that sufficient wastewater infrastructure capacity exists or will be provided in a timely manner to serve the development. Development will not be permitted if it would result in the overloading of the existing wastewater network or lead to unacceptable pollution of the environment." Duty to Cooperate Evidence: Include within the justification for each

settlement's development allocations specific evidence of how the Council has cooperated with Southwest Water to assess and address infrastructure capacity. Suggested Revised Wording (Example): "Justification for Strategic Policy SD02: Axminster and its development allocations... The allocations in this policy have been informed by detailed assessments of infrastructure capacity, including consultation and joint working with Southwest Water to ensure that the necessary upgrades to wastewater infrastructure can be delivered to support the proposed development." Phasing of Development: Where necessary, include phasing policies that tie development to the delivery of infrastructure improvements. Suggested Revised Wording (Example): "Development at [?????????? ???????] will be phased to ensure that wastewater infrastructure improvements are completed prior to the occupation of new dwellings. Planning permission for later phases of development will be contingent on the successful delivery of the required infrastructure upgrades." These modifications will make Chapter 5 legally compliant by ensuring that the plan adheres to the NPPF's requirements for sustainable development and demonstrates that infrastructure needs will be met.

3(b). If no, please give details 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," is not sound because it allocates development without providing a robust and detailed framework for ensuring that the necessary infrastructure, particularly wastewater infrastructure, will be delivered. The chapter relies on general statements about the need for infrastructure but lacks the specific commitments, mechanisms, and certainty required to demonstrate that infrastructure deficits will be addressed and that development will be sustainable. The absence of a clear "infrastructure-first" approach and the failure to adequately address the known issues with Southwest Water's capacity render this chapter 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.: To make Chapter 5 sound, the following modifications are necessary:

Detailed Infrastructure Delivery Plan: For each town and village, include a detailed plan outlining the necessary wastewater infrastructure upgrades, how they will be funded, and a clear timeline for delivery. Suggested Revised Wording (Example for Honiton): "Strategic Policy SD03: Honiton and its development allocations... Development within Honiton will be supported by a comprehensive infrastructure delivery plan that includes: 1) Upgrades to the Honiton Sewage Treatment Works, to be completed by [date]. 2) Improvements to the local sewer network, with priority given to [?????????? ??????]. 3) Implementation of Sustainable Drainage Systems (SuDS) to manage surface water runoff." Contingency Measures: Include contingency measures to prevent development from proceeding if the necessary infrastructure is not delivered as planned. Suggested Revised Wording (Example): "If the required wastewater infrastructure upgrades are not completed by the specified dates, development in [?????????? ???????] will be restricted to [???????????? ?????????? ?????], until such time as the infrastructure is in place. " Community Involvement: Establish a mechanism for ongoing community involvement in the monitoring and review of infrastructure delivery. Suggested Revised Wording: "The Council will establish a community liaison group for each major development area to provide regular updates on infrastructure progress and to address any concerns raised by local residents. " These modifications will make Chapter 5 sound by providing the necessary detail, certainty, and accountability regarding infrastructure delivery, ensuring that development is sustainable and that community concerns are addressed.

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.: Chapter 5, "Development in the Towns and Villages," fails to comply with the Duty to Cooperate because it does not provide sufficient evidence of effective engagement and joint working with relevant authorities and stakeholders, particularly Southwest Water, to address strategic infrastructure issues. While the chapter allocates development in various settlements, it lacks specific details on how the Council has cooperated with SWW to ensure that wastewater infrastructure capacity will be sufficient to support the proposed growth. The chapter's policies do not demonstrate that the Council has actively engaged with SWW to plan for and secure the necessary infrastructure improvements, which is a key requirement of the Duty to Cooperate.

5.11

Proposal:

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

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

5.3

Proposal:

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.:

5.3

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.: Jargon hides the real motives behind 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.: No attention to other existing 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.: Effective section will never be achieved when builders don't build 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.: Busy area already under stress from poor infrastructure. To add 1,000 more properties is unacceptable Roads in a dreadful state ,short of parking in town, A376 narrow and easily disrupted so people from 1,000 homes coming onto road will not help. Sewage systems broken already . Schools full, doctors already overloaded. Building on land that is of significant natural importance. No dusty to

cooperate. Transport connections ignored Environmental protection is Zero. Infrastructure planning none.

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

Proposal:

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.:

5.3

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 mention of infrastructure .. No schools, doctors no use of bat boxes swift bricks solar panels electric charging for cars. No SEWAGE problems addressed.

5.4

Proposal:

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.:

5.4

5.5

Proposal:

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?: 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 strategic planning committee put the development of land close to Gittisham Village forward without proper consideration to the East Devon National landscape and the fact that houses are proposed in an Area of Outstanding Natural beauty.

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 development should not go ahead. There are far more suitable sites in East Devon

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

3(b). If no, please give details 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 encroaches into an Area of Outstanding Natural Beauty and the decision to build there was based on submissions (over 30 mins) by agents on behalf of the land owners with insufficient time given to objectors (3 Mins) Adverse heritage impacts are bound to affect the historic village of Gittisham and cannot be offset by alleged 'open areas'. This proposed development is no less than the rape of our countryside and historical heritage.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 any modifications will make it sound, because it is inherently flawed in principal.

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.: Proper account has been not taken of local objections.

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

Proposal:

5. Development in the Towns and Villages

SD01

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 EDDC, I do not have your detailed knowledge of all the rules and policy references relating to this proposal.

I would like to record my opposition to Exmo_20 in the most simple terms: No! No! Exmo_20 is too big. No! Exmo_20 is too close to Budleigh. No! Exmo_20 destroys the Green Wedge between Exmouth and Budleigh Salterton. No! Exmo_20 is built too high on up on the site destroying the skyline of our 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.: Please revise this proposition to a more reasonable size and site.

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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

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

3(b). If no, please give details 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 really hope you read and take heed of this email and the many others I know you must be receiving. I have absolutely no confidence currently in East Devon Council. With all the issues around the sewage situation and business closures I really doubt they have the best interests of the local community at heart at all.

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 EExmo_17.

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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 conflict with policy HE02. The development surrounding St Johns in the Wilderness Church will have dramatic effects due to the amount of housing surrounding it - there is a clue in the name St Johns " in the wilderness" - The policy states that proposals for development will be expected to be sympathetic to listed buildings and their settings. This development would totally change the setting of St John in the Wilderness

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

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages 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 regarding the proposed development at Exmo_20.

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 ll* 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.

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 Exmou20 - it 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.: Exmou_20 is not in line with policies PB01, PB04, OL09, OL01 & para 2.10, 13.23 & 13.9. Development of Exmou20 would cause serious detriment to the adjacent pebblebed heaths. The pebblebed Heaths are one of the most important scientific and unique areas in this country and in Europe. Is this to be totally ignored by proposers and planners involved with the local plan. Once destroyed it is destroyed forever and there are many sites in East Devon which could be developed without the detriment to this unique national and international asset.

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

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 and locals not informed / maps inaccurate online

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

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.: Exmou 20 not suitable at HELAA stage - omitted from Reg 18 consultation - site allocated without proper 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.: Take out Exmou20 - it 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.: Due to lack of infrastructure and services EXmou 20 is unsound - Parfa 3,.34 - SD01. All sewage generated in the proposed development area will have to pass through the overloaded existing Exmouth sewage system and has to be pumped for treatment. Not only are the sewers overloaded and discharge to storm overflows in times of wet weather but the pumping station and sewage treatment works are completely overloaded. No consideration should be given to this development unless it can be shown that the existing infrastructure can cope with the loadings.

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

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 and locals not informed / maps inaccurate online

5. If your representation is seeking a modification to the 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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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details 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 - AR01(B) - The entire Exmou_20 site is on steeply sloping impermeable Marl. All rainfall will therefore pass to lower areas - into Withycombe Brook and to the lower parts of Exmouth creating a huge flood risk. Until recently mitigation measures on a vast area of Exmouth connecting to Exmou20 area was constructed without any mitigation measures and therefore the situation is much worse than the situation in the 1960's when over 700 houses were flooded due to the incapacity of the Withycombe Brook to take the flows. Is it correct to subject a vast population of Exmouth to these flooding risks (and house insurance constraints).

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

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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 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 ll* 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)

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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.: Exmouth_20 would have a negative impact on the countryside and wildlife 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_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)

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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.: Main access point for Exmo_20 is much closer to Budleigh Salterton than Exmouth, the former would be the preferred choice for residents of Exmo20. This undermines the settlement hierarchy and lead to coalesnce of Budleigh & Exmouth. Contrary to Policy oL05

Exmo20 would cause harm to adjacent pebblebed heaths. Contrary to HELAA.

Exmo20 would cause harm to heritage assests sazon/norman/medieval. 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 Exmo20 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)

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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.: 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 from any town centre for people to use walking or cycling as their choice of transport. Thais 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

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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 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 ll* 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. Permission should not be granted for development which would result in increased pollution to rivers, water bodies, estuaries and the sea. Current sewage infrastructure in Exmouth and Budleigh Salterton is insufficient to deal with current current sewage treatment leading to increased unregulated and discharge of sewage into coastal bathing waters.

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

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors. Exmo_20 would increase the need for car travel and increase traffic congestion. It is unsuitable development.It is isolated and people would need to travel much further than 800m to existing key services and facilities and could not walk or cycle as their choice of transport. The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient and accessible town, but without having the services and infrastructure to support 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.: Remove Exmo_20 from the local plan.

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? 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

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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.

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? 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)

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.: ? 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 ll* 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)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 ll* 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)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Developing Exmo_20 is contrary to Polocy PB01 of the local plan and not in accordance with the mitigation strategy

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 area, eliminating 'tranquillity, wildness and dark skies', which is contrary to POLICY OL01. In addition, Exmo_20 would increase the need for car travel, contrary to figure 7 - the energy hierarchy, while increasing traffic congestion, in conflict to paragraph 11.2. The development is isolated, causing residents to need to travel more that 800m to existing key services and facilities, contrary to paragraph 11.6. It is much to far (with a large gradient) for walking or cycling (for the non tour de France cyclists) to and from town. This contradicts 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.

>Implement: Secondary school, doctor and dentist provisions, whilst moving in families of doctors/dentists and teachers to the area. To fill the need of the additional residents.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: >Implementing Secondary school, doctor and dentist provisions, whilst moving in families of doctors/dentists and teachers to the area. To fill the need of the additional residents. Plus drainage and additional required services.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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 Reduce the size of Exmo_20 Do not assess 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)?: Yes, I wish to participate 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, teacher and parent I feel driven to protect the local area and conserve our natural spaces as much as possible. There are alternatives and we residents should be able to voice them.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 & 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 wide diversity of birdlife.

Exmo_08 and 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.

Under this 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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. It will mean logically that residents would use Budleigh Salterton as its most accessible town. The services and infrastructure of Budleigh such as doctors, schools, high street would therefore be the most practical obvious place to use. This is absolutely not sustainable and contrary to PolicyOL05 of the local plan would lead to the 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 from the local plan

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 2022, the minutes from your meeting regarding the emerging local plan were published, but they contained a profoundly inaccurate and misleading map of Exm_20. This error was not merely a minor oversight; it was a clear misrepresentation of the site's boundaries. Despite my raising concerns at the time, questioning why such an obvious inaccuracy was allowed to persist, the planning department failed to conduct even basic due diligence or checks on the information provided by "the landowner." The implications of this failure were severe. The site was grossly misrepresented as a potential development area far larger than what was actually available. In reality, this area included private freehold dwellings and, more critically, a Grade II listed church and its associated graveyard—features which should have immediately disqualified the site from being considered for development. When I raised these issues, your response was not only dismissive but also irresponsible. You "assumed" that the land was available and, without further investigation, chose not to question this assumption. This lack of scrutiny continued to undermine the integrity of the local plan, as the erroneous mapping continued to be used throughout the Housing and Economic Land Availability Assessment (HELAA) process and beyond. This was despite the fact that numerous residents, including myself, had already pointed out these significant inaccuracies. Yet, the council proceeded to rely on this false information, including in discussions and decisions at the Strategic Planning Committee (SPC), at the meeting on 4th September. At that meeting, this same misleading mapping was used to manipulate the councillors, pushing them toward the allocation of EXM_20, despite the fact that, at this stage, it was acknowledged that further investigation would be required before such an allocation could be justified. The language used—referring to the site as an "opportunity too good to miss"—was not only inappropriate but an attempt to pressure the council into a decision based on false and incomplete information. As a result, the SPC has been led to consider a site that was clearly unsuitable from the outset due to its size and its significant constraints, including the presence of protected heritage assets. What is more troubling is that, despite being made aware of these inaccuracies back in 2022, no

corrective action was taken. This negligence is not just a failure of process; it is a failure of governance, and it has directly contributed to the current untenable position the council finds itself in—knowing that the local plan is unsound, undermined by foundational errors. This situation reflects gross incompetence in the planning department, and the continued use of inaccurate and misleading information has seriously compromised the credibility of the entire planning process. It is deeply disappointing that the council has not acted on the clear warning signs and continues to put forward an unsound plan, disregarding the concerns of residents and planning professionals alike. I believe that these contradict the NPPF chapter 3, due to the inaccuracies being present during the site sifting process and also the PCPA 2004 section 33A. Copy of email correspondence in August 2022 (and reply from Mr M Dickins, planning policy Manager) attached for transparency and authentication.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 BudleighSalterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (HighStreet,Doctors,school, beach etc) would be the obvious choice for residents of Exmouth-20. This would lead to coalescence of Budleigh and Exmouth, contrary toPOLICY 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 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 reality is that this is a substantial development primarily affecting Budleigh which does not have the services and infrastructure to cope. this undermines settlement hierarchy and results in a merger of Budleigh with exmouth contrary tp Policy OL05 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.: Remove Exmo_20 from Plan or Revert 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)

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number 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.: A lot of controversy and objections surrounding these sites, in particular Exmo_20, but EDDC councillors and planning officers have spent a significant amount of their time over the last 18 months assessing alternative sites and have concluded that this is the most suitable and most feasible site for allocation on this scale. Agree it should go ahead to comply with Government housing targets, with sufficient infrastructure to accommodate it.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 is not sound for many reasons. The proposed development is closer to Budleigh than it is to Exmouth so the impact would be far greater on Budleigh Salterton. The local primary school in Budleigh Salterton is already at capacity so raising the question where would these children go to school? Likewise, many doctors surgeries in Exmouth (according to the NHS website) are not accepting new patients so putting additional pressure on already overstretched healthcare services. Exmo_20 together with Exmo _17 would result in excess of 1000 new houses which is likely to have a significant impact on the level of traffic on the B3179, thus causing congestion. This would also increase noise, light and traffic pollution in the area because people would have to drive to work and school due to being located on the outskirts of the towns of Exmouth and Budleigh Salterton and due to poor transport networks serving the area. The development is proposed to be build on beautiful countryside resulting in loss of natural habitat with no efforts being made by the developer to offset this. Flood risk would also be impacted.

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

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your 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.: EX20Would cause harm to the heritage assets at Saxon/Norman/Medieval settlement, most significantly St John in WildernessGrade11*Pittsburgh eroding the attractive rural setting for worship &burials currently exists.EX20 would have a dertrmmetal on this open country side it cause irreplaceable habitats,veteran trees and species across the site.contrary to PARGRAPH 13.9Remove 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 value the countryside .

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ruin 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 harmful and damaging to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

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

Exmo_20 would have drastically alter the peaceful setting for worship which currently exists for the congregation and community at St John's in the wilderness Grade II listed church and churchyard, along with other significantly adverse affects. 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 people to travel by car and therefore traffic congestion would increase, in conflict with PARAGRAPH11.2. 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. Residents of Exmo_20 would inevitably rely on the services and infrastructure of Budleigh (High Street, Doctor's, school,beach etc). 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 make sure all points are considered with the due care and attention they should be.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 goes against POLICY OL01.

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

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

Exmo_20 would have a significant impact on St John in the Wilderness Grade ll* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation, and wider community. 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 further 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 increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH11.2. It is unsustainable development. It is isolated from the amenities 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, particularly younger or older people. 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 Budleigh and Exmouth 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.: 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 and will draw its residents to Budleigh's facilities and infrastructure with the potential for overwhelming them. It is contrary to POLICY OL05 and Budleigh would lose its separate identity.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 or at least reduce the size of Exmo_20 and in any event avoid access to the 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)?: No, I do not wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 sensibly located as it causes damage to the natural environment Contrary to policy PB01 Destruction off wild life habitats contrary top. Para 13.23 of local Plan Upstream of Exmouth rainwater catchment area of Withycombe Brook on clay so soakaways don't work - worsens flood risk conflicts with policy AR01B Increase traffic conflicts para 11.2 Unsustainable development in isolated area with no key services nearby Builds between 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.: Revert to previous 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 closest to Budleigh Salterton thus making it likely choice for surgery and chemist which are already very busy. Too far for new residents to walk or cycle therefore increased pressure on car parking. Coalescence of Budleigh and Exmouth contrary to POLICY OLO5 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.: Considerably 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Development Exmo_20 is contrary to POLICY PBO1 of the local plan and not in accordance with the mitigation strategy. This would destroy the peace and quiet and dark skies of the countryside which is contrary to POLICY OLO1. It would fragment and and isolated habitats and destroy wildlife corridors contract to Paragraph 13.23 of the Local Plan. The services and infrastructure of Budleigh would not cope with the additional households. It would increase traffic and 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)?: No, I do not wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 to exmo20 is very close to Budleigh Salterton. The services and infrastructure would be the choice of residents of Exm20 thus undermining the settlement hierarchy and would lead to the joining of Budleigh and Exmouth against Policy ol05 of the local plan This would also have a detrimental effect on the local countryside and increase the need for car travel resulting in more pollution to the atmosphere

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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) statesthat 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 hierachy, 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

...Exmo_20 would have significant adverse effects on St John in the Wilderness Grade ll* 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 PARAGRAPH11.2. 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.

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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 too close to Budleigh Salterton which would put strain on services and infrastucture. It is contrary to Policy OLO5 of the local plan. It would cause harm to heritage assets, contrary to Policy HE02. It would cause significant harm to the wildlife in the area, which is home to deer. This is contrary to Policy OLO1 Exmo_20 would exacerbate the already identified flood risk along Withicombe Brook through Exmouth in conflict with Policy ARO1B. It would cause unsustainable traffic through a relatively narrow road 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.: Remove Exmo_20 from the Local

Remove Exmo_20 frrom the Local Plan/

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 feel very strongly that Exmo_20 is not a good plan.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 Fig7, and increase congestion in conflict with para 11.2

Additionally the infrastructure in terms of sewage facilities is insufficient to support a 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)?: No, I do not wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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(a) & (b) increase in vehicle movements, contrary to Figure 7 the energy hierarchy and increased traffic congestion, in conflict with Paragraph11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800mto 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.

Meadowview Road and Southern Wood roads were constructed to design criteria applicable to early 1970's and not appropriate to today's traffic density and weights etc which would impact on access for heavy plant, machinery and general construction vehicles movements requiring access to this development, especially given the quantity of parked vehicles on these roads day and night, due to the quantity of vehicle ownership per household, which is often more than one, which leads to congestion with vehicles being parked on the pavement and visibility splays at junctions day and night.

Owners of the vehicles parked in Meadowview Road don't necessarily live in the road but due to being unable to park in the off roads have resulted in parking their less used vehicles in Meadowview.

The developer is proposing accessing the development site through Southern Wood off Meadowview which will mean significant vehicles movements through Meadowview Road. Currently there are more than 300 households in Meadowview Road and the Cul-de-sacs off whose sole access out of the estate is onto Dinan Way via two restricted junctions. This development proposal would increase traffic movements by over 50% through these two junctions. In conflict of Paragraph 11.2 as this can only increase traffic congestion and safety.

Dinan Way is currently very busy before the western extension is built which will increase the traffic movements between the Salterton Road and Exeter Road and then the housing that is associated with that particular development (LYM 12) will use Dinan Way. Goodmores Farm development is yet to be completed, which will further increase the vehicle movements onto Dinan Way making it very difficult to enter from side roads and provide congestion at each end.

Currently there is no safe pedestrian crossing of the busy Dinan Way at the western end of Meadowview Road entry/exit making it difficult trying to cross to access the bus routes on the opposite side, or walk to Brixington shops, a traffic island would be helpful. In conflict of Paragraph 11.2, safety.

Development of Exmo_20 on heavy clay subsoil with inefficient 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 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.: To alleviate the impact of traffic onto Meadowview Road, Southern Wood and Dinan Way, access the development site from Liverton Business Park as the services are there and if required to be increased can be done easier than bringing them through a congestion residential streets. Consider access also from the B3179.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 OLO5 of the Local Plan. Exmo_20 would increase the need for car travel and increase traffic congestion - especially for those travelling to hospital appointments.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The possible development of EXMO_20 on the heavy clay subsoil with ineffective soakaways would exacerbate the already known and identified downstream flood risk along the length of the Withycombe Brook through Exmouth, which is already beyond its designed capacity. This conflicts with Policy AR01B. The springs that give rise to the brook are clearly identifiable on both 1:25000 and 1:50000 Ordnance Survey maps.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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. 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 ll* 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 Reduce the size of Exmo_20 Do not assess 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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_23 should be located on an alternative site where it would cause less harm and 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 hedgerows across the site contrary to Paragraph 13.9. Exmo_23 consists of sloping ground towards Courtlands Lane and Lympstone Manor with a clear possibility of flooding to the road and housing on the Lane. Exmo_23 would increase dramatically the need for car travel as there are no reasonable shopping facilities or school places available nearby. This is in conflict with Paragraph 11.2. It is an unsustainable development and is isolated by which people would need to travel 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. 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 will lead to joining up of Exmouth and Budleigh Salerton. It is

This will lead to the joining up of Exmouth and Budleigh Salterton. It is contrary to POLICY OL05 OF THE LOCAL PLAN.

It will cause harm to the adjacent Pebblebed Heaths. This allocation 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.

This development would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement most significantly St John in the Wilderness Grade 11 listed church loosing the beautiful rural setting for worship and burials which has existed for a long time. This is contrary to POLICY HE02.

It would have detrimental effect on this beautiful open countryside and the adjacent wildlife sites eliminating the tranquility wildness and dark skies which is so valuable

including locals mental health. Contrary to POLICY OL01. It would be in conflict with the Strategic Nature Area 368breaking up and isolating habitats which will destroy the essential wildlife corridors contrary to PARAGRAPH 13.23 of the Local Plan. Harming irreplaceable habitats trees which have been there for decades (which will be felled even if they are not supposed to be - other local developments) and species rich hedgerows (which again will be removed as in other developments) across the eite contrary to PARAGRAPH 13.9.

It ids in conflict with POLICY OL09 and POLICY PB0 as the Habitats Regulations Assessment states there is currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA) so the plan fails the integrity test. The main site access is opposite the SAC/SPA.

The clay with ineffective soakaways will increase the downstream flooding along Withycombe Brook through Exmouth which is under pressure from climate changes and all the other recent housing developments, This is in conflict with POLICY AR01B.

This development will greatly increase the traffic contrary to Figure7. The energy heirarchy and increase traffic congestion in conflict 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 walk or cycle 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

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.: r

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 Paragraph 13.23 of the local plan.it would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows Acc Ross 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 ant 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 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 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 Exmo_17

The development of Exmo_20 would be contrary to the NPPF Para. 16 which advises that "Plans should: a) be prepared with the objective of contributing to the achievement of sustainable development"

Para. 77 advises that “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.

This site is not in a sustainable location. Occupiers of the dwellings would be dependent on use of private motor cars to access employment and services. Residents would be likely to find employment in Exeter and seek services such as doctors and the primary school in Budleigh Salterton, which is closer than Exmouth Town Centre. Para 109. of the NPPF advises that "Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve: a) making transport considerations an important part of early

engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; c) understanding and addressing the potential impacts of development on transport networks; d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated; e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.". As mentioned above this site is not in a sustainable location and would have an undue impact on the transport network. The development is likely to cause congestion on the B3179 from the proposed access. Exmo_20 together with Exmo _17 would result in excess of 1000 new houses which is likely to have a significant impact on the level of traffic on the B3179 and around the primary school in Budleigh Salterton and near the medical practice and generally in the town centre and beach areas. Residents are unlikely to use bicycles due to the hilly nature of the area. A “genuine choice of transport modes” would not be available as required by the NPPF (Para. 77) The development of over 1000 houses from Exmo_17 and Exmo_20 would put undue pressure on local schools and the local Medical centres. It is noted that some local GPs in Exmouth are already not accepting new patients.

Policy OL01 of the proposed Local Plan advises that "East Devon’s landscape, countryside and rural areas will be protected against harmful development". It is considered that the development of Exmo_17 and Exmo_20 would not be in accordance with this policy. Exmo_20 would result in the loss of irreplaceable countryside and habitats and cause damage to the natural environment. Exmo_17 is located in the East Devon National Landscape Area which is an area of outstanding natural beauty which should be protected and where large scale developments should not be allowed. In fact Policy OL02 of the Proposed Local Plan advises "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" The development of Exmo_17 does not accord with this Policy.

The scale of the proposed developments to the east of Exmouth is eroding the gap between the two settlements of Budleigh Salterton and Exmouth and eroding their sense of character and distinctiveness.

Exmo_20 would be detrimental to the setting of Saint John in the Wilderness a grade II* listed church and contrary to Policy HE02 of the proposed 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 and reduce the scale of Exmo_17

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 Exmouth-20 is significantly closer to Budleigh Salterton than Exmouth thus services and infrastructure of Budleigh (doctors, school, health centre etc) would be preferred choice for residents of Exmouth-20. Would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OLO5 of Local Plan. Harm to the Pebble ed Heaths and contrary to HELAA. EXMOUTH-20 would harm heritage assets of ancient settlement and particularly erode setting of St John in the Wilderness. Detrimental effect on countryside and wildlife sites and eliminate 'tranquility, wildness and dark skies' contrary to policy 0L01 Would be in conflict with Strategic Nature Area 36. Air quality would be adversely affected which is in conflict with POLICY 0l09 and POLICY PB04. Flood risk - heavy clay soils Increased car travel. Unsustainable development. Residents could not access facilities at all easily without car travel. 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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: By developing Exmo_20 it would result in fragmentation and isolation and destruction of wildlife corridors. This is contrary to PARAGRAPH 13.23 of the local plan. This would also be detrimental to irreplaceable habitats, which have taken decades to achieve. Veteran trees and species rich hedgerows would also be destroyed across the proposed site. This is also 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

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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 contrary to Policy PB01 of the Local Plan, is not in accordance with the mitigation strategy and will cause harm to the Pebblebed Heaths (SAC/SPA). Exmo_20 is contrary to Policy OL01. Development Exmo_20 would fragment wildlife habitats and corridors, contrary to paras 13.23 and 13.9 of the Local Plan. Exmo_20 would exacerbate existing flood risk, contrary to Policy AR01B. Exmo_20 would cause traffic congestion, contrary to para 11.2 of the Local Plan, and place pressure on local services and infrastructure (particularly in Budleigh Salterton), 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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.: 3b Exmou20 is in total conflict with paragraph 3.34 which states that the approach ensures development is concentrated in areas with existing infrastructure and services. The existing sewerage system covering Exmouth and the single treatment works situated at Maer lane is totally inadequate for its present purpose and no new development should be added to the system until its obvious deficiencies have been rectified and proven to be so by published calculations. The populations of Exmouth, Budleigh Salterton and Sandy Bay have been subjected to continual raw sewage overflows into the bathing waters of Exmouth and Budleigh Salterton over recent years. These have not been isolated incidents but have been continual failures requiring fleets of tankers running through Exmouth and Budleigh Salterton in summer holiday periods. The sewerage system of Exmouth is antiquated and relies on 3 systems most of which were constructed early in the last century. Many parts of these systems were combined foul and surface water sewers serving the town. The lower system requires pumping to the middle and higher systems to discharge originally onto Maer Rocks - untreated until 1972. A new treatment plant was constructed completed in 1972 - having taken over 20 years to achieve in planning and land acquisition. This plant was designed for a population of Exmouth and Sandy bay which would exist in the 1980s and is clearly totally inadequate for the present day populations particularly as sewage from Budleigh Salterton is being pumped to it aswell. Until recently all sewage from Exmouth is now pumped from Maer Road pumping station through a 750mm SI pumping main which was installed in 1970!. Recent failures have occurred because the main which is now 55 years old has been subjected to increased pressures due to attempts to increase the flow rate through treatment plants. The failure of this main in recent years has caused contamination to land and beaches in addition to the storm water overflows which have been discharging due to overloading of the entire system.The treatment works consisted of only 3 basic settlement tanks with sludge collected being discharged untreated to the

outfall - discharging on the tide near bathing waters at Straight Point. The water Authority now needs to demonstrate with published calculations what additional treatment facilities they have added and what standard of effluent they are achieving before discharge. Also the flows and the population for which the treatment plant is catering for. All bodies responsible for health and planning in the area and for promoting further development will be responsible for problems caused in the future by failure to carry out the necessary works in previous years. It would be totally irresponsible in the extreme to permit additional flows from new populations overloading a totally failed system. The health and safety of residents of Exmouth and Budleigh are at risk and no development should be permitted in Exmou 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.: Take out Exmou 20 from local plan. Ensure infrastructure is in place particularly ref sewage treatment before any new developments are permitted

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.: ENSURE RESIDENTS COMMENTS ARE HEARD AND THAT ACTUAL CONSULTATION TAKES PLACE

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 Ex20_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)?: Yes, I wish to participate 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 own the property, Crimond, Exmouth, EX8 5EE

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The increased risk of fires and disturbance from development proposed at Exmo_20 will cause harm the Pebblebed Heaths (SAC/SPA]. There is no buffer and it will It will fragment and isolate habitats and have a detrimental effect to wildlife.

Exmo_20 would also increase the need for a car and therefore increasing traffic and pollution to the area. The nearest facilities are not walkable making the proposal 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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. 22 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 adiacent Pebblebed Heaths (SSS/SAC/SPA/NNR) due to Exmo. 20 being a supporting foraging habital. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PBO1 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. Exmo 20 would cause harm to the heritate assets at this saxor/Normal/ Medieval settlement, most significaner+388ohn in the Wilderness Grade It* listed church, eroding the attracticantiraisefnefor worship 8 burias wilich currently exists. 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 Exmou20 is in conflict with policy AR01(B)-This development will hugely increase flood risk in the Withycombe Brook area. The development of productive agricultural land draining directly to the existing Withycombe Brook will create the potential for very severe flooding of the Withycombe area and other areas of Exmouth . The site is very steep on clay soil and with current sudden rainfall levels - which are only set to increase - the risk of flash flooding due to building on this site is phenomenal. The development of this site will put many houses and people in danger and no amount of mitigation proposed by developers can take away the site location at the top of a hill and soil structure. Mass flooding has taken place before and since then mass development has taken place already in the area without mitigation measures - exacerbating this risk even before the addition of another housing estate. The catchment area of Exmou 20 is very vulnerable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 due to high flood risk. Ensure developers are responsible for mitigation measures prior to building in any other areas.

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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.: Exmou20 is in total conflict with paragraph 3.34 which states that the approach ensures development is concentrated in areas with existing infrastructure and services. The existing sewerage system covering Exmouth and the single treatment works situated at Maer lane is totally inadequate for its present purpose and no new development should be added to the system until its obvious deficiencies have been rectified and proven to be so by published calculations. The populations of Exmouth, Budleigh Salterton and Sandy Bay have been subjected to continual raw sewage overflows into the bathing waters of Exmouth and Budleigh Salterton over recent years. These have not been isolated incidents but have been continual failures requiring fleets of tankers running through Exmouth and Budleigh Salterton in summer holiday periods. The sewerage system of Exmouth is antiquated and relies on 3 systems most of which were constructed early in the last century. Many parts of these systems were combined foul and surface water sewers serving the town. The lower system requires pumping to the middle and higher systems to discharge originally onto Maer Rocks - untreated until 1972. A new treatment plant was constructed completed in 1972 - having taken over 20 years to achieve in planning and land acquisition. This plant was designed for a population of Exmouth and Sandy bay which would exist in the 1980s and is clearly totally inadequate for the present day populations particularly as sewage from Budleigh Salterton is being pumped to it aswell. Until recently all sewage from Exmouth is now pumped from Maer Road pumping station through a 750mm SI pumping main which was installed in 1970!. Recent failures have occurred because the main which is now 55 years old has been subjected to increased pressures due to attempts to increase the flow rate through treatment plants. The failure of this main in recent years has caused contamination to land and beaches in addition to the storm water overflows which have been discharging due to overloading of the entire system.The treatment works consisted of only 3 basic settlement tanks with sludge collected being discharged untreated to the

outfall - discharging on the tide near bathing waters at Straight Point. The water Authority now needs to demonstrate with published calculations what additional treatment facilities they have added and what standard of effluent they are achieving before discharge. Also the flows and the population for which the treatment plant is catering for. All bodies responsible for health and planning in the area and for promoting further development will be responsible for problems caused in the future by failure to carry out the necessary works in previous years. It would be totally irresponsible in the extreme to permit additional flows from new populations overloading a totally failed system. The health and safety of residents of Exmouth and Budleigh are at risk and no development should be permitted in Exmou 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.: Take out Exmou 20 from local plan. Ensure infrastructure is in place particularly ref sewage treatment before any new developments are permitted

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 were not informed and were not given the opportunity to voice opinions

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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 OL05of 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: building this development here is too far out of the town centre which will increase traffic too Exmouth and Budleigh Salterton massively. There is no projection for further schools (both primary and secondary) which would be needed for the increase in families in an already stretched education system. Also for the existing medical and dental services within the town. No consideration is made for another supermarket which the Exmouth and Budleigh urgently require. Yes, the Aldi is planned but with the amount of housing planning this small store would not be enough.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 houses are to be built own this site. It needs to be massively reduced and include urgent infrastructure that is required for the two towns.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 legal language used backs government guidance

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

3(b). If no, please give details 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: o The highest level of protection must be given to conserving and enhancing landscape and scenic beauty in National Landscapes. o Development should be strictly limited in these areas. o The proposed extension fundamentally contradicts this principle, as it represents large-scale urban encroachment into a protected landscape.

• Paragraph 177: o Major development in a National Landscape should be refused unless it passes exceptional circumstances tests and is in the public interest. o 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 o Requires that development must enhance, not harm, the special qualities of National Landscapes. o The proposal would cause irreversible harm, violating this policy outright.
- Policy D1: Design and Local Distinctiveness o Development must respect and protect local landscape character. o The urban expansion into protected countryside undermines the distinctive rural and coastal identity of Budleigh Salterton and its surroundings.
- Urban Sprawl Prevention & Settlement Separation o The merging of Exmouth and Budleigh Salterton is a serious planning concern. o 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.: Modification is not required, its EDDC adherence to its own policies that is required.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 heaths. Developing Exmo_20 would destroy the tranquillity, wildness and dark skies of the countryside, which is contrary to POLICY OL01. It would be detrimental to irreplicable habitats and species rich hedgerows across the site, contrary to PARAGRAPHS13.9

The main access point of EXMO20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh such as the High street, doctors, school would be the obvious choice for residents of EXMO20. 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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The nearest town is budleigh which has limited parking, one road to the town, issues with sanitation/sewage already from over Population - infrastructure is far from sufficient and it would ruin much of the environment; wildlife's habitat, existing properties will have their values reduced, the small lanes will not cope. This must break several laws and should not be allowed.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 the most accessible town and services such as Doctors, School, more congestion on High Street, car parks and the beach. The beach is already in the news for being contaminated by the storm overflows releasing sewage into the sea. The B3179 is full of potholes, winding , floods and there have been several accidents from traffic joining it from Bicton, Woodbury, St. John's Lane crossing in the dip going to Bystock there is enough traffic already on the B3179 so where are all the extra vehicles going to go? We all saw the damage done by giant earth moving Lorrie's when the Otter project was in progress to the road edges adjacent Pebblebed Heaths and flora and fauna as a foraging habitat and destroy wildlife corridors and habitats. PARAGRAPH 13.9. You advertise East Devon as an Area of Outstanding Natural Beauty which should be preserved and protected or are the signs you have errected meaningless?!This proposal on all counts is totally unsuitable for this site and far too large and just plain greedy!

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages 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.: Services and infrastructure of Budleigh could not possibly cope. It 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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 & accessible town. The services & infrastructure of Budleigh (High st, doctors, school,beach etc) would be the preferred choice for residents of Exmo-20. This undermines the settlement hoerarchy & would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative to Exmo-20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo-20 would also 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 PBO1 of the local plan & 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 open countryside & adjacent internationally designated wildlife sites, eliminating the tranquility, wildness & dark skies which is contrary to POLICY OL01.

Exmo-20 development would be in conflict with the Strategic Nature Area 368, fragmenting & isolating habitats & destroy wildlife corridors, contrary to

PARAGRAPH13.23 pf the Local Plan. It would cause harm to irreplaceable habitats, veteran trees & species, rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo-20 is in conflict with POLICY OL09 & POLICY PB04 as the Habitats Regulations Assessment

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 alternative sites where it would cause less conflict or no harm to the Pebblebed Heaths [S A/C/ SPA]. Developing Exmo 20 is contrary to policy PB01 of the local plan. Examples of where housing could be located - there are brownfield sites available across the East Devon area, Woodbury Salterton have indicated they would like additional housing, but refused as out of time and other sites, i.e. Lympstone where land was not allocated in the local plan because of ****** parish councillor - this should be subject to a judicial review of the Strategic Planning Committee. Exmo_20 would destroy the tranquillity, wildness and dark skies of the countryside to the distinct neighbouring areas which are directly adjacent to the SAC/ SPA. This is a large scale site, which if developed would destroy the habitats of the wildlife of the countryside, which is contrary to paragraph 13.23 of the Local Plan. I have witnessed other attempts to mitigate some wildlife habitats on development land and I can say they have been abysmal. The felling of old trees and species rich hedgerows across the site cannot be compensated with newly laid growths and is contrary to paragraph 13.9. The owls, buzzards, woodpeckers and Jays to name but a few birds would be displaced and may be unable to survive. Air quality in the area will be reduced - the Habitats Regulations Assessment [13.1.25] 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]. It is in conflict with East Devon's own policy OL09 and Policy BP04. Exmo_20 would have significant adverse effect on Saint John in the Wilderness grade 2 listed church and churchyard where the peace and tranquillity for worship, funerals, weddings and visiting the graveyard has been enjoyed. Development of the surrounding area would adversely affect the peaceful setting required at a church and churchyard. 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. A flood risk has already been identified through the lower lying land at the bottom of the site and down through Withycombe. Unfortunately, South West Water cannot be trusted

and cannot cope with the current pressures of excess water and regardless of their promises there seems to be no light at the end of the tunnel where they can control the current situation of excess water, let alone any water from additional development. This is in conflict with policy AR01B. Exmo_20 would vastly increase the need for car travel which is in conflict with paragraph 11.2. It is an unsustainable development, situated on the very outskirts of Exmouth, with walking and cycling (uphill) in and out of Exmouth [4miles] to access the train station and other key services, not an option for the majority of people. This is contrary to policy TR01. The main access point of Exmo_20 is significantly closer to the small town of Budleigh Salterton than to Exmouth making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh would be the obvious choice for residents. This would lead to coalescence of Budleigh and Exmouth country to policy OL05 of the local plan. Budleigh Is a quiet unspoilt seaside town frequented by tourists seeking a quieter and less commercial place to visit. A huge development on the approach to Budleigh would have a negative impact on the tourist industry which Budleigh heavily relies upon.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 intrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierachy and would lead to coalescenece of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. The impact on our already crumbling sewage facility will be catastrophic. 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 severe 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.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 Exmo_20 to be removed from the Local Plan and not to access the site via the B3179 or Southern Wood. Exmo_20b has not been adequately diseminated publicly.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 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 trreplaceable habitats , veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Devoloping EXMO-20 would severely harm the habitat for several nationally important species such as Nightjar, Dartford Warbler and Silver-studded Blue butterfly.

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 ll*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 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, Parking ,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 UK government values farming and farmland and its increasing importance to securely provide home produced food for our people. Exmo_20 is contrary to this position as it would see the destruction and loss of this valuable national resource.

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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!

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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-20is significantly closer to Budleigh Salterton than Exmouth, making Budleighthe most convenient and accessible town meaning the infrastructure and services including Doctore, School, beach, shopping 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 Exmouth-20 for housing allocation should be selected, one deemed possible, achievable and suitablele in the HELAA, Exmouth-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 toto 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 exists. 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 preferred choice for residents of Exmo_20. This undermines the settlement hierachy 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 preferred choice for residents of Exmo_20. This undermines the settlement hierachy 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 road is totally inadequate due to it being a 'B' road. I feel no provision has been made for schools, doctor's surgery or sewage system. Has an improvement to the sewage system been considered? The current system is already inadequate as certain events have illustrated in recent years.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 the Exmo_20 plan altogether as per my 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)?: No, I do not wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 - Infrasctructure delivery: this policy outlines the requirement for necessary infrastructure, including waste water management systems, to be in place to support new developments. South West Water is not currently providing the infrasctruture needed for current housing so unless this situation is addressed and upgraded how can the needs of the new housing be met.

Policy OL09: Control of pollution - we are all aware of the beach closures that happened last year which constituted a pollution crisis at the height of tourist season - again this is with the current housing and not with an extra 2700 homes.

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 develeopment within Exmouth, Maer Lane STW catchement 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 sewaeg 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 opinion the site is totally unacceptable from many view points. Not the least being infrastructure, access, inadequate highway and access point. Not to mention inadequate sewage system, lack of provision for medical services and schools etc. I do understand the need for more housing in the area but surely more serious attention should be paid to find a more suitable 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.: Please remove the Exmo_20 plan altogether as per my 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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, school, beach, doctors, dentist etc) would be the preferred choice for 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 makes Budleigh the more accessible and convenient town. The town and its services ie Doctors and schools can't cope with the additional strain on what is already stretched. Any future development should consider all the additional services needed to support health and wellbeing. This development is contrary to previous policies of the local plan.

There is also the harm which would be caused to the Pebblebed Heaths . Also, the harm to the heritage assets, in particular St John in the Wilderness Grade II listed church. There is also the detrimental effect on the countryside, nature. The effect on sewerage which is already having a massive impact on our waterways, including the pollutions to our swimming waters.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmo20would increase car travel, contrary to Figure 7, the energy hierachy, traffic congestion, in conflict with PARAGRAPH 11.2the isolated location provides unsustainable development as residents would need to traval further than 800m to key existing services contrary to PARAGRAPH 11.6. it is too far and steep to any town centre,to use bycycle or walking. 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 B3179

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Sewage disposal in the area is not capable of having more houses going in to pipework.. already completely stretched. Budleigh to woodbury road is small and road surface would be unable to cope with a big rise in traffic. Budleigh primary school is falling apart and needs new classrooms and would not be able to accommodate more pupils. The is very little nursery provision for young children, certainly in Budleigh Salterton and even Exmouth, For working families to use. Budleigh and Claremont health centre is already stretched to capacity for patients. Parking is at a premium in Budleigh for shoppers, and with shops closing down in the town, what is there to offer a tide of people who want to buy things. More cars and people in the area will have a massive effect on the whole environment... not in a good way either.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 exmouth is closer to budleigh will impact on Budleigh services and infrastructure Would cause harm to the heritage sites of woodbury and pebblebeds B3179 road is extremely narrow and with lots of extra vehicles using it, with proposed housing site it will cause the road surface to break up The sewage problems with exmouth and Budleigh are already passed their limits.. so i cannot understand how 700 new houses will not have a terrible impact on what is an already overloaded infrastructure..

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 Exmo-20 is contrary to POLICY PB 01 and not in accordance with the mitigation strategy.

Proposal:

5. Development in the Towns and Villages

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

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

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 prosed at exmou20 could and should be at a alternative site. This will cause less harm to the pebblebed heaths. Developing exmo20 is contrary to policy pb01 of the local plan and not in accordance with the mitigation strategy. Ok

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The outline for Exmo_20 is in conflict with Strategic Nature Area 368, fragmenenting and isolating habitats, and destroying widelife corridors, contrary to Para. 13.23 of the Local Plan. It would cause harm to irreplaceble habitats, veteran trees and species rich hedgerows across the site, contrary to Para. 13.9.

In addition, the development of Exmo_20 on heavy clay subsool with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth which is also under additional stresses from climate change. This is in conflict with polic ARO1B

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.: 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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.: Poor access. Too close to BudleighSalterton. Lacking infrastructure. Inadequate 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 Local Plan Reduce size Change 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)

Proposal:

5. Development in the Towns and Villages

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

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 locally and not in accordance with the mitigation strategy.

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, Doctor's, School, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and exouth 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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_20would destroy the "tranquillity, wildness and dark skies"of the countryside , which is contrary to POLICY OL01.

Developing EXmo_20would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of theLocal 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_20would have significant adverse effects on St John in the Wilderness Grade ll 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 PARAGRAPH11.6. 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 Ex20_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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 et cetera) 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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.

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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 its most convenient and accessible town. Residents of Exmo_20 would therefore see the services and infrastructure of Budleigh (High Street, Doctors, School, Beach, etc. as their preferred choice. 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 for various reasons as their preferred choice current proposal is contrary to POLICY HE02, POLICY OL01 and POLICY TR01. It is also contrary to PARAGRAPHS 13.9 and 13.23 of the Local Plan as well as being in conflict with the Strategic Nature Area 368, POLICY OL09, POLICY PB04 and POLICY AR01B as well as with PARAGRAPH 11.2 of the Local Plan, and contrary to PARAGRAPH 11.6 of the Local Plan. Exmo_20 would have a generally detrimental effect on the local natural environment and heritage and fragment and isolate habitats and destroy wildlife corridors. Traffic congestion would increase and the isolated location of Exmo_20 provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities. It us 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)?: No, I do not wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 Exmo_20 proposal is contrary to POLICY OL05 of the Local Plan as it undermines the settlement hierarchy in that it would lead to coalescence of Budleigh & Exmouth. This is because the main access point is closer to Budleigh than Exmouth thus making Budleigh its most convenient and accessible town with the services and infrastructure of Budleigh becoming the preferred choice for residents of Exmo_ 20.

2. In accordance with HELAA, an alternative site to Exmo_20 should be selected, one to be deemed available, achievable and suitable. The proposed Exmo_20 would cause damage to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to the proposed site of Exmo_20 being a supporting foraging habitat. This development of Exmo_20 would be in contravention to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3. Harm would be caused to heritage assets, should Exmo_20 proceed, most significantly St John in the Wilderness Grade 11 listed church and churchyard, thus causing drastic negative effect on the desirable rural setting for worship and burials which currently exists, contrary to POLICY HE02.

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.

5. 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 PARAGRA{H 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.

6. Exmo_20 would cause a detrimental effect on the adjacent designated wildlife sites and destroy the 'tranquillity, wilderness and dark skies' of the countryside, all contrary to POLICY OL01.

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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 Exmo_20 proposal is contrary to POLICY OL05 of the Local Plan as it undermines the settlement hierarchy in that it would lead to coalescence of Budleigh & Exmouth. This is because the main access point is closer to Budleigh than Exmouth thus making Budleigh its most convenient and accessible town with the services and infrastructure of Budleigh becoming the preferred choice for residents of Exmo_ 20.

2. In accordance with HELAA, an alternative site to Exmo_20 should be selected, one to be deemed available, achievable and suitable. The proposed Exmo_20 would cause damage to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to the proposed site of Exmo_20 being a supporting foraging habitat. This development of Exmo_20 would be in contravention to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3. Harm would be caused to heritage assets, should Exmo_20 proceed, most significantly St John in the Wilderness Grade 11 listed church and churchyard, thus causing drastic negative effect on the desirable rural setting for worship and burials which currently exists, contrary to POLICY HE02.

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.

5. 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 PARAGRA{H 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.

6. Exmo_20 would cause a detrimental effect on the adjacent designated wildlife sites and destroy the 'tranquillity, wilderness and dark skies' of the countryside, all contrary to POLICY OL01.

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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 located at an alternative site where it definitely cause less damage to the Pebblebed Heaths (SAC/SPA) . Developing Exmo-20 is contrary to POLICY PB01 of the local plan and not in accordance with 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 ll* 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 the plan. Do not access the site via the B3179 Do not access the site vis 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)?: Yes, I wish to participate 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 believe that the voice of the community needs to be heard

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 would be preferred choice for residents of Exmo _20 putting excessive pressure on doctors sewage schools 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High street, doctors, school, beach, sewage system 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.: Reduce the size of Exmo_20 and do not access the site via the B3179

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 than Exmouth making Budleigh the most accessible town. The services and infrastructure of Budleigh (doctors, school, sewage infrastructure) which are already under strain would be impacted by this. 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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.: 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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.

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.

I have been a resident of Budleigh Salterton since 1998 during which time I have seen a progressive deterioration in the vehicular traffic coming into the town not only in the increase in volume but in the speed which cars travel along the road into the town from its junction with Salterton Road. Parts of this main road into Budleigh are not paved and this makes it almost impossible to walk safely into the High Street at any time of the day or night. 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 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 Exmouth_20 from the Local Plan.

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 the 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;

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 SD01 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes mean that such improvements cannot be 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 the massive under capacity of the sewage treatment facility - clearly without economically viable investment for a site, the allocations are 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 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 '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 and immoral.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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, where I live, than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh such as the High street, doctors, school, beach and the wetlands 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 cotrary 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.

The B3179 is the main artery for the Emergency services to reach the RD&E from Budleigh Salterton, Otterton, East Budleigh and Colaton Raleigh and would need to be considerably widened to absorb increased traffic from Exmo_20 both before and after it is established.

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Everyone's voice must be heard.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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.

The main access point to Exmo_20 is significantly closer to Budleigh than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (high Street, Doctor's, schools 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 B31769 So not access the site via Southern Wood. Revert to Exmo_20b as previously propsed.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations assesment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. Exmo_20 would have significant adverse effects on St John in the Wilderness Grade ll* listed church and churchyard. A place of worship needs to be a peaceful place. 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 B3179 is already at full capacity and even more so during holidays times. 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 Exmouth, making Budleigh it's most convenient and accessible town. The service and infrastructure of Budleigh (High Street, Doctor's, School, beach etc) would be the preferred choice for residents of Exmouth_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 Exmouth_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmouth_20 would cause harm to the adjacent Pebbled Heaths (SSS1/SAC/SPA/NNR) due to Exmouth_20 being a supporting foraging habitat. Developing Exmouth_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmouth_20 would 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 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 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 rise hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICE OL09 and POLICY PB04 AS THE Habitats Regulations Assessment (30.01.25) states there i 'currently not sufficient certainty to rule out adverse effects in integrity in relation to …air quality (East Devon Pebbled Heaths SAC/SPA such that the plan fails the integrity test. 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, contrary to PARAGRAGH 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.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ac ross 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 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_20is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on subsoil of 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 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 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 acceptable town. The services and infrastructure of Budleigh salterton (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 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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 The development proposed at Exmo_20 could and should be 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 ll* 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)?: No, I do not wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

* Exmo_20 would have significant adverse effects on St John in the Wilderness Grade ll* 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 are only 46 National Landscapes in England which is why according to National Planning Policy Framework ,planning permission should be reused for major development in a N.L unless there are exceptional circumstances.Anything more than a few houses that are not contiguous with the existing built area of a settlement has the potential impact on the N.L greater than the development. National England have advised that the STRENGTHENED DUTY underlines the importance of AVOIDING HARM to the statutory purposes of Protected Landscapes. Section 85 CROW ACT Relevant authorities must seek to FURTHER THE PURPOSE of conserving and enhancing the NATURAL BEAUTY OF THE AREA.

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your 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 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 metres 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(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 less or no harm would be caused 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/erode 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 the 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, which is 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 effect on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for its 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 foot of the site and down through Withycombe. This is in conflict with POLICY AR01B.

-Exmo_20 would increase the requirement for car travel and increase traffic congestion in the area, in conflict with paragraph 11.2. It is unsustainable development. It is isolated and people would need to travel much further than the 800m to existing key services and facilities, contrary to Paragraph 11.6. it would be too far, and too steep,

from any town centre for people to use walking or cycling as their mode 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 Salterton its natural (convenient/accessible) town. The services and infrastructure of Budleigh (High Street, Doctor's/medical centre, school, beach, etc.,) would be the obvious choice for residents of Exmo_20, but could not be sustained - car parks are full at weekends in mid winter as it it is and the High Street often impassable. Further, this would lead to the merging of Budleigh Salterton 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) Relocate some housing to Woodbury/Woodbury Salterton area building in improved amenities.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade ll* 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?: 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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.: This part of the Development in the Towns and Villages chapter is not sound because it conflicts with East Devon District Councils Strategic Policy OL02: National Landscapes: "The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes in East Devon". "Major development in a NL will only be permitted in exceptional circumstances".

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 be permitted in Exmo_17 for the reasons stated above. Alternative brownfield and infill sites within Exmouth are available but local councillors voted against using these sites 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?: 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. ? The Habitats Regulations assesment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to…air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade ll* 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.

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 the access off the B3179 will put undue pressure on Budleigh services and infrastructure.

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 access to Exmo_20 from the B3179 will mean most inhabitants will use Budleigh as their main service town. The existing school is struggling with unsuitable buildings and the there would be unacceptable pressure on the medical centre and other services. This 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.: Reduce the size of Exmo_20. Do not access the 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)?: No, I do not wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The B3179access point would mean the majority of residents of Exmo_20 would use Budleigh as their main service centre. The school is struggling badly under the present population, and the town medical centre would also struggle. This 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.: Revert to Exmo_20b as previously proposed. Do not access the development 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)?: No, I do not wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 Exmo_20 an increase in local traffic and associated congestion conflicts with Paragraph 11.2. For disabled people there will be considerable difficulties in accessing local services contrary to Paragraph 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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 located on impermeable clay soils will exacerbate the very real problem of downstream flooding - clashing with the requirements 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.: Revert to Exmo_20B - the original 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 have a substantial negative impact on nearby wildlife thus clashing with the intentions of POLICY OL01, Paragraph 13.23 of the Local plan and 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 from the B3179 should not be implemented.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 Primary concern is that the proposed Exmo_20 is very close to Budleigh Salterton - effectively fusing the separate settlements of Budleigh Salterton and Exmouth in conflict with Policy PB01 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 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)?: No, I do not wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 put excess pressure on existing services such as schools and doctors which can hardly cope now.. The possibility of harm to adjacent pebble bed heaths and altering an attractive rural setting. All contrary to POLICIES OL05 & 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 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 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 AR012. 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_20from the Local 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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.: Buiding within Coastal preservation zone

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.: Withdraw the site from allocation

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

3(b). If no, please give details 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\ None of the Residents mainly affected by the decision of the Strategic planning commitee were made aware of the meeting which decided on this allocation back in 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.: Hold another meeting to allow Resident input.

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 holding information from those 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.: Previous applications for fewer houses on this land have been refused on environmental and access grounds.Courtlands Lane is is a nightmare for residents as it is single lane with properties acting as passing places.Also difficult and dangerous for Pedestrians with reports of people clipped by fast moving vehicles. The proposed development forms a visible part of the Valley two thirds of which is owned by the National Trust Lower Halsdon Farm. Several years ago they opened the valley up with a path which wends its way down to the Estuary from the very busy A376.This has become a wonderful community asset, a haven of green from the increasingly built up Town. An intrusive development such as this would be totally at variance from what the Coastal is designed to prevent.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 the 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 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 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 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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. Exmo_20 would destroy the "tranquillity, wildlife 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 (30.01.25) confirms that there is "currently no 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 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 accesspoint of Exmo_20 is signifacantly 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 th local 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 faciillities, contrary to PARAGRAPH 11.6. It is too far (and too steep) form 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 Local 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)

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.: 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. It is too far and too steep from any town centre for people to use walking or cycling as their transport of choice. 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 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 Exmo_20 from the local plan

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 will have an adverse effect on the peacefulness if St John in the Wilderness 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.: No access to the site via Southern Wood. This is already a busy residential area, its would became a nightmare trying to get out of any adjoinng close onto Meadowview 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)

Proposal:

5. Development in the Towns and Villages

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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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 Reduce the size of Exmo_20 Do not assess the site via 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 XO 20 is closer to above be sorted on the next month making badly it's most convenient accessible time. The service is an infrastructure of Budleigh High Street Dr schools Beach would be preferred choice for residence of EXO 20 this undermines a segment hierarchy and would also lead to coalescence and X-Men Country policy OL05 of the local plan. X 20. I'm just it would also cause harm to the adjacent pebble bed Heath being a supporting foreign habitat development. XO 20 is contrary to policy PBO one of the local plan and not in accordance with the mitigation strategy it would also cause harm to the heritage assets most significantly St John's in the wilderness grade 2 church and Churchyard drastically altering the attractive rule setting for worship and burial which currently exist 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.: I would prefer XO 20 was totally removed from the plan being at the original meeting that was stipulated as red on the map which was not suitable for development Two other pieces of land in Woodbury and Lympstone were totally overlooked, even though these areas were green.

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

Proposal:

5. Development in the Towns and Villages

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3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put 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 witness that this will be a just and fair hearing

Proposal:

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3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put 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 witness that this is a fair and just hearing

Proposal:

5. Development in the Towns and Villages

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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.: In order that there is a fair and just hearing of the case

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 rather than Exmouth, therefore BS is far more likely to be the more convenient location and have a very large impact on the town. Due to the isolated location there would be the need for car travel and increase traffic congestion in conflict with PARAGRAPH 11.2 and PARAGRAPH 11.6. The location is too far and unsuitable for walking or cycling as a means of transport - contrary to POLICY TR01. The location would also be contrary to POLICY OL01, POLICY OL09, POLICY PB04, POLICY AR01B. It is contrary to PARAGRAPH 13.23 and 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.: Preference is given to remove Exmo_20 from The Local Plan.

If there is a need then it should be reduced in size but with an alternative access that is neither on the B3179 nor via Southern Wood.

Alternatively 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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 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?: 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.: With a population of over 35,000 in EXMOUTH and the already over-crowded facilities likes schools and surgeries etc the town is already at maximum capacity

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 severely damage the vital habitats, critically damaging the essential wildlife corridors that exist on this farmland. As a resident living directly adjacent to this farmland proposed for development, we witness daily the rich wildlife that depend on this important habitat. Notably, deers, owls, bull finches, badgers, wood peckers, foxes, just to name a few. This is in complete contradiction to Paragraph 13.23 of the Local Plan. Furthermore, Paragraph 13.9 states the importance of protecting habitats, veteran and ancient trees and hedgerows which these species rely upon, and the development of Exmo_20 would completely contradict this. Furthermore, Exmo_20 will have a catastrophic impact on the Pebblebed Heaths (SAC/SPA) and this is a blatant violation of POLICY PB01 of the local plan and not in accordance with the mitigation strategy. This strategy exists for a reason, yet this ill-thought through development is ignorant to this. The Habitats Regulations Assessment (30.01.25) explicitly states that there is “currently not sufficient certainty to rule out adverse effects on integrity” regarding air quality in the East Devon Pebblebed Heaths SAC/SPA. Yet, Exmo_20 remains in the local plan, recklessly disregarding POLICY OL09 and POLICY PB04. As local residents, we use the heathland daily, enjoying the tranquillity and rich wildlife that exists there. However, with increased houses, increased population and therefore, footfall into this area, the damage this would cause is likely to cause restrictions on access to this wonderful natural resource in the future. The reason we moved to this area, was to be in close proximity to the Pebblebed Heath, in it’s current form, of being so well preserved, not limited to controlled access of a decimated site. Adding to this, Exmo_20 would eradicate the “tranquillity, wildness, and dark skies” that define the countryside we live in. This contradicts POLICY OL01, discounting the value of natural serenity in favour of thoughtless development. A pertinent point for us to make against this absurd development relates to the proximity of it to St John’s in the Wilderness Church, where our children were Christened and three of our parents have been laid to rest. The

peaceful sanctity and seclusion we get when tending to their gravesides would be shattered and this would be utterly devasting. The adverse effects to this Grade II* listed building and 'wilderness' would go against POLICY HE02. From a sustainability standpoint, Exmo_20 is a disaster! The increased traffic on the on the B3179 would cause significant congestion and the road is just not fit for purpose! This is in conflict with paragraph 11.2. For the main point of access to the development to be off the B3179 would be a dangerous and unwise decision, with the roads being too narrow to suitably the manage the high volume of vehicles which would thus use it. Not only presenting a danger to human life, but also to the vital wildlife that inhabit the adjacent SPA/SAC. This extensive development, with the huge amount of traffic it would bring, would cause adverse effects on our Nationally important wildlife. In the proposal, Southernwood is listed as another vehicular access point. The localised congestion in this area, where my son resides, is already a huge problem. Large vehicles struggle to navigate the congested roads, where parking already for residents, is extremely difficult. It will be of certainty, that the Highways department, will take issue with this, as they originally did so in their initial assessment of the viability of this site. Finally, please can we suggest that East Devon Council consider Courtlands Lane a more appropriate area to build, near a local Counsellors house, which coincidentally, was swiftly removed from site allocation 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.: 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 severely damage the vital habitats, critically damaging the essential wildlife corridors that exist on this farmland. As a resident living directly adjacent to this farmland proposed for development, we witness daily the rich wildlife that depend on this important habitat. Notably, deers, owls, bull finches, badgers, wood peckers, foxes, just to name a few. This is in complete contradiction to Paragraph 13.23 of the Local Plan.

Furthermore, Paragraph 13.9 states the importance of protecting habitats, veteran and ancient trees and hedgerows which these species rely upon, and the development of Exmo_20 would completely contradict this.

Furthermore, Exmo_20 will have a catastrophic impact on the Pebblebed Heaths (SAC/SPA) and this is a blatant violation of POLICY PB01 of the local plan and not in accordance with the mitigation strategy. This strategy exists for a reason, yet this ill-thought through development is ignorant to this.

The Habitats Regulations Assessment (30.01.25) explicitly states that there is “currently not sufficient certainty to rule out adverse effects on integrity” regarding air quality in the East Devon Pebblebed Heaths SAC/SPA. Yet, Exmo_20 remains in the local plan, recklessly disregarding POLICY OL09 and POLICY PB04. As local residents, we use the heathland daily, enjoying the tranquillity and rich wildlife that exists there. However, with increased houses, increased population and therefore, footfall into this area, the damage this would cause is likely to cause restrictions on access to this wonderful natural resource in the future. The reason we moved to this area, was to be in

close proximity to the Pebblebed Heath, in it's current form, of being so well preserved, not limited to controlled access of a decimated site.

Adding to this, Exmo_20 would eradicate the "tranquillity, wildness, and dark skies" that define the countryside we live in. This contradicts POLICY OL01, discounting the value of natural serenity in favour of thoughtless development.

A pertinent point for us to make against this absurd development relates to the proximity of it to St John's in the Wilderness Church, where our children were Christened and three of our parents have been laid to rest. The peaceful sanctity and seclusion we get when tending to their gravesides would be shattered and this would be utterly devasting. The adverse effects to this Grade II* listed building and 'wilderness' would go against POLICY HE02.

From a sustainability standpoint, Exmo_20 is a disaster! The increased traffic on the on the B3179 would cause significant congestion and the road is just not fit for purpose! This is in conflict with paragraph 11.2. For the main point of access to the development to be off the B3179 would be a dangerous and unwise decision, with the roads being too narrow to suitably the manage the high volume of vehicles which would thus use it. Not only presenting a danger to human life, but also to the vital wildlife that inhabit the adjacent SPA/SAC. This extensive development, with the huge amount of traffic it would bring, would cause adverse effects on our Nationally important wildlife.

In the proposal, Southernwood is listed as another vehicular access point. The localised congestion in this area, where my son resides, is already a huge problem. Large vehicles struggle to navigate the congested roads, where parking already for residents, is extremely difficult. It will be of certainty, that the Highways department, will take issue with this, as they originally did so in their initial assessment of the viability of this site.

Finally, please can we suggest that East Devon Council consider Courtlands Lane a more appropriate area to build, near a local Counsellors house, which coincidentally, was swiftly removed from site allocation 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.: 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 viewpoints are taken seriously.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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. Where are you going to site the new sewage processing plant? The current sewage processing capability is already clearly insufficient for purpose. There are regular sewage dumps onto Budleigh beach already and my open water swimming group have to cancel at least one, often two swims a week due to pollution and risk of infection. Some members have already had to have time off work due to infection. With around 2000 more people anticipated to be added to the local population, you surely don't expect the current sewage processing capability to provide a safe environment for visitors and bathers?

2. Access to the new development onto the B3179 in the vicinity of the Archery Club is clearly not well thought out. Certainly not by anybody who regularly drives the route. Heavy lorries already use the route to access Budleigh and it is barely wide enough now with marginal visibility at points. With an anticipated addition of some one thousand cars adding to daily use, it could well develop into an accident black spot. You would probably have to put a thirty mph limit on it with traffic lights onto the new housing development. The proposed new development's close proximity to Budleigh town centre will also cause problems. The High Street is essentially a single lane, 'wait your turn' road now; imagine the congestion with a thousand more cars in the mix. Contrary to Policy TR01.

3.What will be the effect of some two thousand more people in the area on the Budleigh Medical Centre? I can't see it expanding as much as the local hair dressing facilities.

4. Ditto the schools; another twelve hundred pupils?

5.Access to Woodbury Common. The Common is a popular place for locals and with the usual Local Authority foresight, the newly developed car parks are already woefully inadequate. Another thousand cars trying to park?

All these above points are 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Indiscriminately building houses in areas that do not have the necessary infrastructure shows remarkably poor judgement. Furthermore, the proposed site is of significance in many ways; the Pebblebed Heaths, the anicent Norman/Saxon/Medieval settlement, the Grade II listed church of St John in the Wilderness, wildlife corridors, air and water quality, not to mention traffic congestion in and out of Budleigh Salterton. Building here is contrary to Policy OL01, OL05, OL09, HELAA, Site Selection Methodology, Policy PB01, PB04, Policy HE02, Policy AR01B, Policy TR01, not to mention a number of parapgraphs in the local plan, including paragraphs 11 and 13.

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

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

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(b). If no, please give details 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 unsustainable and will increase severe traffic congestion and travel times. It is a larger development and is not within 800metres of 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 - contrary to Policy TR01. It would also be very dangerous to walk or cycle from the exit on the B3179

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 an appalling and reckless ****** on the environment, the community, and common sense. It will have a catastrophic, nagative impact on the Pebblebed Heaths (SAC/SPA) and this is a blatant violation of POLICY PB01 of the local plan. The mitigation strategy exists for a reason, yet this ill-conceived proposal tramples over it without a second thought. The proposed development would recklessly fragment and isolate vital habitats, obliterating critical wildlife corridors and endangering irreplaceable ecosystems. This blatant disregard for the environment violates both PARAGRAPH 13.23 and PARAGRAPH 13.9 of the Local Plan, exposing an alarming ignorance for veteran trees, species-rich hedgerows, and all the biodiversity that relies on them. The Habitats Regulations Assessment (30.01.25) explicitly acknowledges that there is “currently not sufficient certainty to rule out adverse effects on integrity” regarding air quality in the East Devon Pebblebed Heaths SAC/SPA. Yet, Exmo_20 charges ahead, recklessly disregarding POLICY OL09 and POLICY PB04. The potential environmental devastation is undeniable. Exmo_20 would obliterate the “tranquillity, wildness, and dark skies” that define the countryside. This is in absolute contradiction of POLICY OL01, disregarding the value of natural serenity in favour of shortsighted development. Beyond its environmental atrocities, Exmo_20 would inflict irreparable harm on the Grade II* listed St John in the Wilderness church and churchyard. The peaceful sanctity of this historic place of worship would be mercilessly shattered, violating POLICY HE02 and demonstrating an utter lack of respect for the cultural and spiritual heritage of the area. Adding insult to injury, Exmo_20 sits upstream of Exmouth’s primary rainwater catchment, on a subsoil of heavy clay that renders soakaways utterly useless. This project would amplify flood risks for the already vulnerable Withycombe area, making a mockery of POLICY AR01B and endangering homes and livelihoods with predictable and preventable water damage. From a sustainability standpoint, Exmo_20 is a catastrophic failure. It would dramatically increase reliance on car travel, worsening traffic congestion and further polluting the environment. It contradicts PARAGRAPH 11.2 and PARAGRAPH 11.6 of the Local Plan,

as it forces residents to travel far beyond the acceptable 800-meter range to access essential services. The topography itself makes walking or cycling an impractical and unrealistic option, directly violating POLICY TR01. Perhaps the most absurd aspect of this debacle is its geographic absurdity. The primary access point is far closer to Budleigh Salterton than Exmouth, effectively siphoning residents towards Budleigh's already strained infrastructure—its High Street, doctor's office, school, and beach. This disastrous planning failure would accelerate the coalescence of Budleigh and Exmouth, eroding local identity and violating POLICY OL05 of the Local Plan. Exmo_20 is not just an ill-advised proposal—it is an act of environmental, cultural, and logistical vandalism. It must be rejected outright before it causes irreversible damage to the landscape, wildlife, and community it so recklessly threatens.

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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. ? The Habitats Regulations assesment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to…air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade ll* 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierachy 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.: 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 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)

Proposal:

5. Development in the Towns and Villages

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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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, with 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 major 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 advert 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages 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 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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. The 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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' in 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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' in 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 development’ 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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/ 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 (approximately 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 stage 2). It has never been either preferred or 2nd choice and 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 increase 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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, 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 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 (Eats Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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.: 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 advert 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 can 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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' 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 of poor quality.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages 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 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, 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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 Reduce the size of Exmo_20 Do not assess 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)?: Yes, I wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 mean a large increase in car travel and increase traffic congestion in conflict with PARAGRAPH 11.2. It is unsustainable development. It is of particular concern that the main entrance to the development would be linked to the already busy and dangerous road between Exmouth and Budleigh Salterton. It is very isolated and people would have to travel a long way to existing key services and facilities, contrary to PARAGRAPH 11.6. Contrary to POLICY TR01, the development would be too far from any town centre for people to use walking and cycling for transport. As a churchgoer, Exmouth_20 would have an adverse effect on St. John in the Wilderness Grade 2 listed church and churchyard which 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 contrary to the HELAA. The site selection methodology and policy PB01 of the local plan is not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Highway access will increase traffic and congestion leading to accidents.

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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.: Exmo_20 would increase the need foe car Travel and increase traffic congestion in conflict with paragraph 11.2 It is unsustainable And people would need to travel further than 800 m to 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 own 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 is inadequate for this amount of development 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 0L01.

.Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 pf 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 (30.01.25) confirms there is "currently not sufficient certainty to rule out adverse effects in integrity in the relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY 0l09 and POLICY PB04.

.Exmo_20 would have significant adverse effects on St. John in the Wilderness Grade ll listed church and churchyard, drastically altering the peaceful setting for worship which 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 proposals in Exmouth) Skip Q2, 2a, 2b and 2c. Just leave them blank

• Q3 asks if you believe the policy is sound. Select NO QR for Facebook Stop Exmo.20

• Skip Q3A

• Q3b write the example sentences below, (or as you see fit):

• 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 OLO1.

• 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. development proposals in Exmouth) Skip Q2, 2a, 2b and 2c. Just leave them blank

• Q3 asks if you believe the policy is sound. Select NO QR for Facebook Stop Exmo.20

• Skip Q3A

• Q3b write the example sentences below, (or as you see fit):

• 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 OLO1.

• 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.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove exmo_20 from the local plan. Amentities already under strain. This will be catastrophic fpr the community of 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)

Proposal:

5. Development in the Towns and Villages

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

1. Exmo_20 should not have access to the B3179. The B3179 is already a very fast and busy road at times and it is entirely inappropriate for additional traffic to be deliberately funnelled onto the road, either by way of direct access or by way of access via either Higher Manley Road or Hulham Road, both of which involve very busy junctions with the B3179. Furthermore, the B3179 is wholly unsuitable for cycling and has no pavements. The above applies in both directions, i.e. towards Exeter and Budleigh Salterton, together with the consequential traffic implications in these directions that access would generate. The proposed access contravenes Local Plan Policy TR01.

2. Preventing access onto the B3179 would also to a great extent prevent Exmo_20 residents finding it easier to use the facilities of Budleigh Salterton rather than those of Exmouth, thus placing unnecessary and unsupportable stress on Budleigh Salterton's local services, such as the Primary School, Medical Centre and the one remaining Pharmacy. Furthermore, if Exmo_20 has access to the B3179 this would amount to a significant step forward in merging Exmouth and Budleigh Salterton which is unacceptable to me and in contravention of Local Plan Policy OL05.

3. The proposed Exmo_20 development is very detached from Exmouth and it is on steep terrain; these together will act to discourage if not wholly eliminate cycling and walking and on the contrary encourage car travel, thus increasing congestion and pollution, including at the roundabout at the top of Knowle Hill and the junction at the foot of Knowle Hill if access to the B3179 is not prevented. Contravenes Local Plan Policy SP01.

4. Exmo_20 should in my view be developed elsewhere, it is unacceptably close to Pebblebed Heath and thus contravenes Local Plan Policy PB01.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 destroy the"tranquillity,wildness,and dark skies"of the countryside,which is contrary to POLICY OLO1

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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 else

? 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages 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 destory the tranquility, wildness and dark skies in the countryside, whichis 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.: Cancel 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 preferable close to Exeter where all the employment is. Developing Exmo 20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. It would massively overload the infrastructure of Exmouth, particularly the sewage systems which cannot cope with the current level of housing let alone any more. The main road to Exeter cannot cope with the current level of traffic as it is so with the combined development of Exmo.20 and Exmo. 17 adding 1100 new houses which equates to 2200 more cars . The added development will increase the risk of flooding in the lower parts of town around Withycombe. It is too far from town for people to walk or cycle, so will need to drive into the centre for shopping, parking in the centre of town is next to impossible nowadays with the implementation of the residents only parking 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 Exmo20 and Exmo17 from the plan, its a gross overdevelopment of the town and Exmouth has been unfairly targeted in this plan , the housing requirements for East Devon should be evenly spread over the whole area. Exmouth is set in a corner with the river Exe on one side and the sea on another, there mis only one main road in and out. We cant take any more housing here.

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 much closer to Budleigh Salterton than Exmouth which makes Budleigh the most accessible town for services such as GP surgery, schools, shops, beach etc. This would undoubtable lead to coalescence of Budleigh and Exmouth 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 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 ll* 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.: None, it is not an appropriate site for all the above reasons.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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's main access point would appear to be nearer Budleigh Salterton rather than Exmouth, and given its proximity will mean that there is a high degree of chance that residences will make use of Budleigh Salterton services and infrastructure. This in term will lead to a degree of merging between Exmouth and Budleigh Salterton town/residents, which I believe is contrary to Policy OL05 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.: Consider changing the access of the site to predominantly direct residents towards Exmouth. Bring in additional services/infrastructure to the development itself, therefore impacting other local areas (namely Budleigh Salterton) on a lesser level. If not installing sufficient services/infrastructure at the development, consider reducing size of development to not impact other local services too greatly. Schooling is a concern with already a sizeable campus for older students at Exmouth and potentially adding additional students to an already large 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 being close to Budleigh Salterton does not have infrastructure re High Street, Doctors, schools. Plan is contrary to Policy OL05 of the local plan. Do not access site from B3179. Exmo_20 would increase car travel and increase traffic congestion in conflict with PARAGRAPH 11.2.Its is isolated and unsustainable development.Travel needs of more than 800m are 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 the 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 to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The service 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 assess the 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 “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 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 this plan or drastically reduce it's 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 * 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)?: Yes, I wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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.: Strategic Policy SD01: Exmouth and its development allocations is not legally compliant because it allocates significant development in Exmouth without providing sufficient assurance that the necessary wastewater infrastructure will be in place to support that development. This contravenes the National Planning Policy Framework (NPPF), which requires local plans to ensure that development is sustainable and that infrastructure needs are addressed. The policy does not include specific requirements for SWW infrastructure upgrades, nor does it demonstrate effective cooperation with Southwest Water to address the known capacity issues and environmental concerns related to wastewater management in Exmouth. The lack of a robust plan to ensure adequate wastewater infrastructure renders the policy legally unsound.

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 make Strategic Policy SD01 legally compliant, the following modifications are necessary:

Infrastructure Capacity Requirement: Include a specific policy requirement that all development proposals in Exmouth must demonstrate that sufficient wastewater infrastructure capacity exists or will be provided in a timely manner to serve the development.

Suggested Revised Wording: "In addition to the requirements outlined below, all development proposals within Exmouth must demonstrate, through a detailed assessment undertaken in consultation with Southwest Water, that sufficient

wastewater infrastructure capacity exists or will be provided in a timely manner to serve the development. Development will not be permitted if it would result in the overloading of the existing wastewater network or lead to unacceptable pollution of the environment." Phasing Linked to Infrastructure: Include a policy that explicitly links the phasing of development in Exmouth to the delivery of necessary wastewater infrastructure improvements.

Suggested Revised Wording: "Development in Exmouth will be phased to align with the provision of adequate wastewater infrastructure. Development will not be permitted to proceed at a rate that outpaces the delivery of necessary infrastructure upgrades. A phasing plan, agreed upon with Southwest Water, must be submitted and approved prior to the commencement of development." Duty to Cooperate Evidence: Include within the justification for Policy SD01 specific evidence of how the Council has cooperated with Southwest Water to assess and address infrastructure capacity in Exmouth.

Suggested Revised Wording: "The allocations in this policy have been informed by detailed assessments of infrastructure capacity, including consultation and joint working with Southwest Water to ensure that the necessary upgrades to wastewater infrastructure can be delivered to support the proposed development in Exmouth." These modifications will make Strategic Policy SD01 legally compliant by ensuring that it adheres to the NPPF's requirements for sustainable development and demonstrates that infrastructure needs will be met.

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

3(b). If no, please give details 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 SD01: Exmouth and its development allocations is not sound because it allocates significant development in Exmouth without providing a robust and detailed framework for ensuring that the necessary infrastructure, particularly wastewater infrastructure, will be delivered. The policy relies on general statements about the need for infrastructure but lacks the specific commitments, mechanisms, and certainty required to demonstrate that infrastructure deficits will be addressed and that development will be sustainable. The absence of a clear "infrastructure-first" approach and the failure to adequately address the known issues with Southwest Water's capacity render this policy unsound. The policy does not provide a credible strategy for ensuring that development in Exmouth is aligned with infrastructure capacity and will not exacerbate existing environmental problems.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 Strategic Policy SD01 sound, the following modifications are necessary:

Detailed Infrastructure Delivery Plan: Include within the justification for Policy SD01 a requirement for a detailed Infrastructure Delivery Plan (IDP) specific to Exmouth, addressing wastewater infrastructure needs. This plan should include:

A clear assessment of existing capacity. Identification of necessary upgrades. A funding strategy. A delivery timetable. Responsibilities for delivery. Suggested Revised Wording: "Development within Exmouth, as outlined in this policy, will be supported by a comprehensive Infrastructure Delivery Plan (IDP) that details how necessary infrastructure, including wastewater infrastructure, will be provided to support the proposed development. The IDP will be developed in collaboration with Southwest Water and other relevant agencies and will be regularly reviewed and updated." Infrastructure Capacity Triggers: Establish specific, measurable triggers related to wastewater infrastructure capacity that will govern the release of housing allocations in Exmouth.

Suggested Revised Wording: "Housing allocations in Exmouth will be released in phases, with each phase contingent on meeting pre-defined triggers related to wastewater infrastructure capacity. These triggers will be developed in consultation with Southwest Water and will include specific metrics, such as treatment capacity and sewer network upgrades. Regular monitoring of these triggers will inform decisions on the release of future housing allocations in Exmouth." Strategic Collaboration Mechanism: Create a formal mechanism for ongoing strategic collaboration with Southwest Water specifically for Exmouth, to ensure that development and wastewater infrastructure planning are integrated.

Suggested Revised Wording: "The Council will establish a strategic partnership with Southwest Water specifically for Exmouth to ensure ongoing collaboration on the planning and delivery of wastewater infrastructure. This partnership will involve regular meetings, joint planning exercises, and information sharing to ensure that development

and infrastructure provision are effectively aligned." These modifications will make Strategic Policy SD01 sound by providing the necessary detail, certainty, and accountability regarding infrastructure delivery, ensuring that development in Exmouth is sustainable, and that community concerns are addressed through a robust and transparent 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.: Strategic Policy SD01: Exmouth and its development allocations fails to comply with the Duty to Cooperate because it does not provide sufficient evidence of effective engagement and joint working with relevant authorities and stakeholders, particularly Southwest Water, to address strategic infrastructure issues. While the policy outlines development allocations for Exmouth, it lacks specific details on how the Council has cooperated with SWW to ensure that wastewater infrastructure capacity will be sufficient to support the proposed growth. The policy does not demonstrate that the Council has actively engaged with SWW to plan for and secure the necessary infrastructure improvements in Exmouth, which is a key requirement of the Duty to Cooperate. There is a lack of transparency and evidence of meaningful collaboration to address the known challenges related to wastewater infrastructure and its impact on development in Exmouth.

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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.: Really good advice on how to best object to EXMO_20 new “facility free village”. Text taken from a leaflet (well done to the author) so you can copy and paste.

SUPERSIZED 700 HOME HOUSING ESTATE PROPOSED WITH MAIN ACCESS AT B3179/ ARCHERY CLUB

THE DRAFT LOCAL PLAN INCLUDES THIS EXMO_20 SITE FOR ALLOCATION FOR A NEW SUBURB THE SIZE OF WOODBURY, WHICH WILL IRREVERSIBLY CHANGE BUDLEIGH & EXMOUTH, PUTTING SIGNIFICANT FURTHER STRAIN ON BOTH TOWNS INCLUDING LOCAL DENTISTS, DOCTORS, SCHOOLS, SERVICES, ROADS, SEWERAGE ETC. WE HAVE UNTIL 30TH MARCH TO ENSURE OUR VOICES ARE HEARD VIA THE EDDC REGULATION 19 LOCAL PLAN CONSULTATION.

OBJECT USING EDDC'S COMMONPLACE PLATFORM
https://eastdevonlocalplanreg19.commonplace.is/

SUBMISSION GUIDANCE

• Step 1. Go to the EDDC website, use QR or Google "East Devon Local Plan Reg 19 Commonplace" " Step 2. Scroll down until you find the "Local Plan Chapters". Step 3. Scroll through and find "Chapter 5, Development in the Towns and Villages" * ??Step 4. Click on "Give your feedback" * ??Step 5. Scroll a little way down and there are some questions, 1-6 HOW TO ANSWER THE QUESTIONS * ??Q1 select POLICY * ??Q1a write

SD01 (this policy refers to all development proposals in Exmouth) * ??Skip Q2, 2a, 2b and 2c. Just leave them blank * ??Q3 asks if you believe the policy is sound. Select NO • Skip Q3A * ??Q3b write the example sentences below, (or as you see fit): QR for Facebook 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 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 Di not access the site from the B3179 Reduce the size of Exmo_20 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 does not or is contrary to POLICY's PB01,OL01,OL09,PB04,HE02,AR018,TR01,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.: REMOVEEXMO-20 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 INCREASE 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.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 issues 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). 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.

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).” 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 significant biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

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.

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 significant number of mature trees which 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.

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 disturbing the darkness across the entire length of the site and 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 tranquility, 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.: Refuse Exmo_20, relocating. Or at the least significantly reduce its size.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 UNSUSTAINABLE LOCATION

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.

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.

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.

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.

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.

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.

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.

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages 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 |I* 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 S00m 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 m. to existing key services. 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.: Greatly reduce the size of Exmo_20, with absolute restriction on further later 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 the requirements of NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" during the site sifting stage (HELAA Stage 2). It was neither a preferred nor a second-choice site, and as such, it was excluded from the Regulation 18 consultations. On 3/9/24, the site was suddenly reclassified from ‘ongoing assessment’ to ‘allocated’, with no opportunity for further public consultation or input from the Strategic Planning Committee, despite the assessment process being incomplete. This lack of transparency and failure to follow proper procedural steps undermines the integrity of the plan-making 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 local 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 OL01. The site is renowned for its dark skies, tranquillity, and wildness. The proposed development would significantly disrupt these qualities. In addition to the light pollution generated by the housing development itself, the main site access, located at the B3179 directly opposite the SPA/SAC/SSSI, would result in a constant flow of car headlights, which would destroy the natural darkness across the entire site, with vehicles shining headlights directly onto the Heaths as they exit the site.

The area surrounding St John in the Wilderness church is characterized by its dark skies and a profound sense of remoteness and tranquillity—elements that are integral to the setting of this Grade II* listed church. The proposed housing development, even with a buffer zone, would severely undermine the church's ‘wilderness’ setting, causing lasting harm to its historic and cultural significance.

POLICY OL01 stipulates that development will only be permitted where it does not harm key aesthetic and perceptual factors such as “tranquillity, wildness, and dark skies.” Exmo_20 blatantly violates this policy by threatening the very qualities that make this area unique and valuable.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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. The National Planning Policy Framework defines 'irreplaceable habitat' as habitats that are either extremely difficult or take an extensive amount of time to restore, recreate, or replace once destroyed. Exmo_20 will result in the loss of such irreplaceable habitats. The site contains a significant number of mature trees, many of which exhibit signs of veteranisation, providing unique microhabitats. The loss of these trees cannot be mitigated by simply planting new ones. Additionally, the site is home to many long-established hedgerows, some of considerable length, which have high intrinsic biodiversity value, acting as important wildlife corridors and habitats. Even if space is left around these features, their degradation and fragmentation are inevitable due to the scale of development.

Furthermore, Nightjars, a qualifying species of the East Devon Heaths SPA, rely on the area for foraging, with studies indicating they can travel up to 7km from their nesting sites to feed at night. The loss of foraging habitat or disruption to their feeding routes would undermine the conservation objectives of the SPA.

Exmo_20 also lies within a designated 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, which is part of the Local Nature Recovery Strategy aimed at linking existing wildlife sites and expanding habitats. The development would destroy crucial wildlife corridors that connect the Pebblebed Heaths to the north and the woodland to the south, further harming biodiversity in the area.

Paragraph 13.9 seeks to protect irreplaceable habitats and important natural features, including ancient woodlands, veteran trees, and species-rich hedgerows, from

destruction and degradation. Exmo_20 would directly contravene this policy by causing irreversible harm to these valuable 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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. The site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, which is a key component of the Local Nature Recovery Strategy designed to link existing wildlife sites and expand habitats. This area provides crucial wildlife corridors, connecting the Pebblebed Heaths to the north with the woodland to the south and beyond. Development of Exmo_20 would severely disrupt these vital habitats and corridors, causing significant harm to biodiversity.

Furthermore, Nightjars, a qualifying feature of the East Devon Heaths SPA, rely on the area for foraging. Studies indicate that Nightjars can travel up to 7km from their nesting sites to feed. Any loss of foraging habitat or disruption of flight paths would undermine the conservation objectives of the SPA.

Paragraph 13.23 of the Local Plan emphasizes the importance of enhancing biodiversity by increasing habitat areas and connecting fragmented habitats. The development of Exmo_20 directly contradicts these objectives and would result in a significant degradation of 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.: 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 directly conflicts with POLICY PB01 and fails to align with the mitigation strategy. This development could and should be located on alternative sites that would result in less or no harm to the Pebblebed Heaths (SAC/SPA). POLICY PB01 explicitly states that development proposals that would cause direct or indirect adverse effects on internationally or nationally designated sites will not be permitted unless it can be demonstrated that no alternative sites exist that would cause less or no harm. Exmo_20 does not meet this critical 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 local 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 TR03 and Figure 7 of the Local Plan. Due to the site's limited access arrangements, the development would result in a significant increase in vehicle movements just to reach essential services in Exmouth and neighbouring settlements via the B3179. Given the site's steep topography and isolated location, any proposed walking or cycling routes would offer limited, if any, viable alternatives to car use. The Local Plan highlights that congestion is a persistent issue in Western East Devon, and with Exmo_20 having no direct access to Dinan Way or the A376, the resulting vehicle movements will be concentrated on rural B roads, which are already known for their congestion and substandard condition.

POLICY TR03 clearly states that planning permission will not be granted for developments likely to generate significant vehicle movements unless measures to secure sustainable travel arrangements are identified, taking into account factors such as the scale of development, the availability of public transport, and walking and cycling options. Exmo_20 fails to meet these criteria.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 directly conflicts with paragraph 3.34. Despite Exmouth being designated as a Tier 1 settlement, it lacks the necessary infrastructure and services to support its existing population. Even if the proposed development contributes financially to infrastructure, it will not address the critical shortage of services, such as the insufficient capacity of doctors' surgeries and dental practices, both of which are already overwhelmed by the current population. Additionally, the development will not provide a new secondary school, despite the fact that, in the past three years, numerous children have been forced to travel to Cranbrook for secondary school placement due to a lack of capacity at Exmouth Community College. The town's sewage system is so inadequate that raw sewage is regularly discharged into the sea, leading to frequent beach closures and making Exmouth a well-known example of national concern regarding sewerage issues. This severe problem has been repeatedly highlighted in national media, underscoring the scale of the crisis.

Paragraph 3.34 asserts that growth should be directed to Tier 1-4 settlements, concentrating development in areas with existing infrastructure and services. Exmo_20 is fundamentally incompatible with this approach.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 directly conflicts with paragraph 11.2. This development would significantly increase travel demands and necessitate longer car journeys. The proposed housing is situated at the southern end of the site, while the main vehicular access is located at the northern edge, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone around the SAC/SPA/SSSI, no housing is permitted within the first 400m, resulting in a minimum 0.5km drive just to reach the housing from the site entrance. This would lead to at least 1km of on-site driving for each journey made. Moreover, accessing Exmouth town centre from the B3179 site entrance requires driving a circuitous route of 4.0-4.3 miles. Exmo_20 would therefore exacerbate travel needs, leading to a significant increase in car journeys and greater overall mileage.

Paragraph 11.2 advocates for concentrating significant development in locations that are or can be made sustainable by minimizing travel needs and reducing traffic congestion. Exmo_20 clearly contradicts these 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 Exmou_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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 TR01. Walking or cycling will not be the preferred modes of transport for residents to access essential services, work, schools, or other daily activities, as the distances involved are far too great. Studies referenced in the Local Plan indicate that most people prefer to walk if their destination is within 0.5 miles, with car use becoming dominant beyond 1 mile, and walking trips virtually nonexistent beyond 2 miles. Exmo_20 is located significantly further than 0.5 miles, or even 1 mile, from key infrastructure and services, making walking or cycling an impractical option. Efforts to provide walking routes, cycle paths, or public transport will not effectively reduce the high volume of car journeys generated by this development, given the steep local topography and the excessive distance to essential services. Additionally, the site's isolation will create significant difficulties for those without access to a car, leading to social exclusion. POLICY TR01 stresses that walking, cycling, and public transport should be the natural first choice, with a strong emphasis on prioritizing these transport modes in 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.: Remove Exmou_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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 directly contradicts paragraph 11.6. As a larger development, the majority of the site lies more than 800m (approximately a 10-minute walk) from any existing key services and facilities. There are no plans to provide significant services on-site, meaning that residents would likely need to drive over two miles (via the B3179) to access essential services in Exmouth or surrounding settlements. Paragraph 11.6 specifies that larger developments should ideally be within 800m of key services and facilities, as studies referenced in the Local Plan show that people prefer to walk if their journey does not exceed 800m or a 10-minute walk each way.

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

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 directly conflicts with POLICY SP01. Although Exmouth is designated as a Tier 1 town, Exmo_20 is located 4 miles by car from the town centre, making it effectively detached from Exmouth and not a viable location for development within the town. Exmouth is already unsuitable for significant further growth, being situated on a peninsula between the River Exe and the coast. The town centre is at the southern tip of this peninsula, rendering 360-degree development unfeasible. With substantial existing development already sprawling far from the town centre, any new development would be closer to neighbouring towns and villages, rather than being located within the principal centre of Exmouth. Therefore, Exmo_20 represents an unsustainable location for development, contrary to POLICY SP01, which aims to concentrate significant 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)?: No, I do not wish to participate in hearing session(s)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 failed to comply with the requirements of the PCPA 2004. Exmo_20 was categorically deemed "not suitable or achievable" during the site sifting stage (HELAA Stage 2) and was neither a preferred nor second-choice site. As a result, it was excluded from the Regulation 18 consultations. On 3/9/24, the site was inexplicably reclassified from 'ongoing assessment' to 'allocated,' without any further public consultation or opportunity for representation, despite the assessment remaining incomplete and unresolved.

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

3(b). If no, please give details of 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 the requirements set out in NPPF Chapter 3. Exmo_20 was explicitly deemed "not suitable or achievable" during the site sifting stage (HELAA Stage 2) and was neither a preferred nor second-choice site. Consequently, it was excluded from the Regulation 18 consultations. On 3/9/24, the site was inexplicably reclassified from 'ongoing assessment' to 'allocated,' with no further opportunity for public consultation or representation, nor any input from the Strategic Planning Committee, despite the assessment being incomplete.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put 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.: The plan has failed to comply with Section 33A of the PCPA 2004. Exmo_20 was assessed as "not suitable or achievable" during the site sifting stage (HELAA Stage 2) and was neither a preferred nor second-choice site. As a result, it was unjustifiably 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 failed to comply with the requirements of the PCPA 2004. Exmo_20 was categorically deemed "not suitable or achievable" during the site sifting stage (HELAA Stage 2) and was neither a preferred nor second-choice site. As a result, it was excluded from the Regulation 18 consultations. On 3/9/24, the site was inexplicably reclassified from 'ongoing assessment' to 'allocated,' without any further public consultation or opportunity for representation, despite the assessment remaining incomplete and unresolved.

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

3(b). If no, please give details of 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 the requirements set out in NPPF Chapter 3. Exmo_20 was explicitly deemed "not suitable or achievable" during the site sifting stage (HELAA Stage 2) and was neither a preferred nor second-choice site. Consequently, it was excluded from the Regulation 18 consultations. On 3/9/24, the site was inexplicably reclassified from 'ongoing assessment' to 'allocated,' with no further opportunity for public consultation or representation, nor any input from the Strategic Planning Committee, despite the assessment being incomplete.

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 failed to comply with Section 33A of the PCPA 2004. Exmo_20 was assessed as "not suitable or achievable" during the site sifting stage (HELAA Stage 2) and was neither a preferred nor second-choice site. As a result, it was unjustifiably 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 irreparably degrade the "tranquillity, wildness, and dark skies" of the countryside, directly violating 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The primary access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the more convenient and accessible town for residents. Key services and infrastructure in Budleigh, such as the High Street, medical facilities, schools, and beach, would become the natural choice for those residing at Exmo_20. This would contribute to the coalescence of Budleigh Salterton and Exmouth, directly contravening 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 situated upstream of Exmouth within the primary rainwater catchment area of Withycombe Brook, on heavy clay subsoil that renders soakaways ineffective. This development would exacerbate the identified flood risk, particularly affecting the lower-lying land at the base of the site and the Withycombe area. This is in direct 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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) explicitly confirms that there is "currently not sufficient certainty to rule out adverse effects on integrity in relation to air quality" at the East Devon Pebblebed Heaths SAC/SPA. As such, Exmo_20 directly conflicts with POLICY OL09 and POLICY PB04.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 critical habitats, severing vital wildlife corridors, in direct contravention of PARAGRAPH 13.23 of the Local Plan. It would also cause significant harm to irreplaceable habitats, veteran trees, and species-rich hedgerows on 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 permanently damage the "tranquillity, wildness, and dark skies" of the countryside, directly contravening 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of 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 relocated to a more suitable site where it would result in minimal or no harm to the Pebblebed Heaths (SAC/SPA). Proceeding with development at Exmo_20 directly contravenes POLICY PB01 of the local plan and fails to align with the established 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 exacerbate the demand for car travel and contribute to increased traffic congestion, directly conflicting with PARAGRAPH 11.2. It represents an unsustainable form of development. The site is isolated, requiring individuals to travel far beyond 800m to access essential services and facilities, in direct contravention of PARAGRAPH 11.6. Its distance and steep terrain make walking or cycling impractical, further breaching 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 result in severe detrimental impacts on the St John in the Wilderness Grade II* listed church and its churchyard, fundamentally altering the tranquil and sacred environment that currently supports the congregation's worship. This contravenes 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 ll* 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)

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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 Exmo20 This is a huge development of 700 houses. It is too big and too close to the Pebblebed Heath which is nationally and internationally recognised as important heathland habitat for biodiversity. We do not have the infrastructure to cope with this with health services, schools, roads, sewage and water systems already at capacity.

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 ll* 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 if it needs to remain then no more than 10% of the proposed size ie 70 houses maximum.

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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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 have concerns that the area will impact negatively on the glowworm population in the local area, specifically an increase in light pollution. This remains one of the few remaining areas where they are thriving in the country and developments should therefore be sited far from their habitats. Significant efforts are being made to reintroduce glowworms in places, and damaging existing colonies is extremely detrimental. I would like to see a full scoping of the impact on this species and their current colonies/habitats.

Similarly there is a risk of light spill from the development affecting foraging and commuting 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.:

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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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_20 is not compliant with policy SP01. It is 4Km from the centre of Exmouth, where a funnel shaped piece of land means it exacerbates the ongoing problem with the topography

3(b). If no, please give details 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 is not sound. It should be removed form the local plan or scaled back there are many objections to the site based on funneling traffic, use of the car against policy TR01, the provision of infrastructure and 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.: Removal of Exmouth_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.: Local planners were ignored in their opinion on Exmouth_20. The comment was not suitable or achievable . It is not the preferred or 2nd choice and not listed in regulatin18 consultations

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and 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.: Unsuitable location

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.: Negative impact on the small town of Budleigh Salterton and its associated services. Road conditions will continue to deteriorate as council focus is diverted.

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.: 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)

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your 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 distinctive tranquil, remote and wilderness setting of St. John's church (grade II*) will be irrevocably lost and irreplaceable.

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details 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)

SD02

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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.: Response from a public meeting held by Axminster Town Council and local residents at Axminster Guildhall Tuesday 25th March 2025 Five specific “headline” categories in the East Devon Local Plan as currently compiled were thought to be somewhat ambiguous and were discussed in some detail. It is important that any development plan can be delivered in practice and the residents believe there are numerous inconsistencies that need to be considered. While these comments relate specifically to the Axminster section of the plan we believe that similar concerns may apply to other areas. Consultation. The use of only on-line notification and comment was considered inappropriate for the population and has excluded a significant number of residents from the planning process. Many East Devon residents do not routinely use (or consider) on-line information and some do not have access to computers. As with many rural areas, internet connectivity can be slow or only sporadically available. It was clear from the meeting that residents had experienced difficulties with both notification of procedures and downloading information. The “Commonplace” facility for on-line comments was not thought to be user-friendly or easy to use. We do not think that the Local Plan draft has undergone either widespread or representative consultation. Residents were concerned that earlier comments on the draft plan did not appear to have been considered in the new draft. 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. 1 Site GH/ED/80a 2 Site Axmi-08 3 Average car ownership in Devon is 1.3/household 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”. 4 UK average is 2.3 people per household 5 Biodiversity Net Gain 6 P J Weddell (Exeter Museums Archaeological Field Unit, Report 91.14, March 1991

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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.: Axminster's infrastructure cannot support a further 1086 dwellings. The developments of 100 and under are okay, but the roads, schools, GP surgery etc could not carry the rest. Reference is made to a "possible future relief road, but paid for by whom?

SD03

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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 Littletown 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.

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.: 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.

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

3(b). If no, please give details 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) 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 Littletown 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.

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

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) 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 Littletown 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.

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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.: I do not consider it legal to have not been communicated with regarding Honi18 and to have had no say in the process until now how can this be a fair and democratic 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.: This plan is not sound because The A35 is already too busy and as the bypass schemes have never been acted in we still have the same problem of a road at max capacity. Adding a junction at waterleat lane I going to make things worse and create a bottle r k. It is also dangerous given the windy nature of 5he road coming down the hill

This is a terrible plan Secondly there is abundant wildlife in the fields. Some are protected species such as badgers. Third the area is a beautiful part of honiton and will be ruined by modern housing estate. Surely this market town needs protecting.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 honi18 plan needs scrapping and the 130 houses built somewhere that can handle the 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.: There is no cooperation with the local people or their concerns or thoughts re honi18;

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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.

Honiton Town Council in addition objects to the inclusion of Honi_07 for development. Honiton Town Council objected during the consultation process due to the adverse impacts on landscape, heritage and its siting within a Natural Landscape (formerly Area of Natural Beauty). Should either Honi_07 or Honi_18 be included for development, Honiton Town Council requests 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.

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

Honiton Town Council in addition objects to the inclusion of Honi_07 for development. Honiton Town Council objected during the consultation process due to the adverse impacts on landscape, heritage and its siting within a Natural Landscape (formerly Area of Natural Beauty). Should either Honi_07 or Honi_18 be included for development, Honiton Town Council requests 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.

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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.: This area of honiton is of outstanding natural beauty and there is stunning wildlife paruculsrly deer/ heron/ buzzards. And is part of the beautiful northern boundary of the town. Building 130 houses here will massively and negatively impact the area. The stunning views will be lost. In addition the raid is already very busy and is simply boot adeaquare fir more traffic.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 think theses housees need to be found in brown forks sites or in land that die#. To eradicate a particularly lovely part of 5he town

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 plan is opposed by local people and their voices need to be heard

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

SD07

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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 sites suggested do not take into consideration the negative impacts on Broadclyst village's existing amenities of increased traffic and vehicle emissions in country lanes, destruction of a wide area of rural land and surrounding natural habitats, light pollution, a poor highway network in the area, environmental degradation and erosion, poor access to the sites, continual flooding on the sites and in the surrounding highway network.

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 sites suggested are in an area particularly important to, and locally valued by, Broadclyst villagers. Development would adversely affect the rural and historic character of the land and village.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Sites are unsuitable as these and the surrounding area are waterlogged. The installation of services would be disruptive putting intolerable pressure on the surrounding narrow country lanes. Housing numbers suggested are too dense for Broadclyst village as local education and health facilities are already over-subscribed. Sites suggested are more than 400m away from education and health services, social amenities and bus routes.

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 sites suggested are in an area particularly important to, and locally valued by, Broadclyst villagers. Development would adversely affect the rural and historic character of the land and 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Part of the site is in flood zone 3. The entire 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.: Your own assessment of 12a and 12b recommended that development should be 'limited to the southernmost field (12a) as any larger development would be on too great a scale for a settlement the size of Broadclyst'. This was a sound decision by EDDC. However, after a sales pitch by LVA on behalf of the landowner this was increased to 100 houses and includes 12b. This is out of scale for Broadclyst with an addition 24 in an adjacent field having been approved. Please listen to your own assessment of this site and do not allow any more than 70 houses on 12a only.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Modify the scale of development for 12a and 12b to restrict development to 12a only and for a maximum of 70 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.: There has been no cooperation with Broadclyst Parish Council on the scale of this development and the Parish Plan is being disregarded.

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

SD08

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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?: 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.: Agree that the land at Barn Lane, site Budl_02, is the most suitable, appropriate and feasible site for new housing in Budleigh.

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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.: Agree that Budl_02 is the most suitable site for new housing in Budleigh.

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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

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)

SD11

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The total number of proposed houses in Woodbury (216) would place far too great a demand on local services (local school, GP surgery) and further add to high traffic levels on the roads towards Exeter. Furthermore, all proposals not directly linked to the B3179 would overwhelm the already congested narrow lanes through the village, especially Town Lane which is predominately a single track road with passing mainly in private driveways.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 reducing the Woodbury (SD11) allocations to only the following plots to both limit the number of new dwellings as well as only developing sites with direct access to the B3179. Wood_06, Wood_09, Wood_16

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)

SD18

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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.: 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.: Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

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.: Flooding: FAS scheme only designed for current housing and not sure if works yet. Sewage: unresolved capacity in sewage system Sustainability: Fewer trains, buses poorly serve area. school and GP surgery full. Narrow roads with pinch points, traffic chaos when diversion put in place during FAS scheme. Nothing changed since 2014 Super Enquiry, therefore issues remain. Building on prime 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.: Reduce drastically the large number of houses proposed- remove Feni-08 as Burlands approved. Look at roads issue.

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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.: EDDC's preferred method of commenting is the ComonPlace system. It is complex and prevents residents making their view known. Especially those not confident with computers. This makes it discriminatory.

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 to comment.

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.: Flooding - the Flood Alleviation Scheme is designed for the present population. Flooding will still take place at Pattersons Cross. Unsustainable - Feniton primary school is oversubscribed. Children have to go to Cranbrook. GP services overwhelmed. Great difficulty in getting an appointment. There has been a deterioration since the Super Enquiry in 2014 when Feniton was not deemed suitable for development.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Adequate infrastructure put in before development. Removal of Feni_08 from the draft local plan or drastic reduction in numbers. Removal of Otry_20 - disproportionate in scale and unsafe 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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.: Under the heading Spatial Strategy you state that developments should contribute towards Net Zero. Nearly all residents in the 127 houses will use cars in our narrow lanes. The train service for most of the day is 2 hourly. There has been talk of a cycle path following old railway line but that is not in your plan. All transport to the industrial units will be by road and the entrance is completely unsuitable. Also sewage works is inadequate The Primary school is also over subscribed without more housing. This document also states this is the minimum number of houses to be built. There are 2 other sites that developers are at present seeking planning permission. in 2014, the Super Enquiry, which cost a lot of money, stated that the village was not suitable for large scale development. Nothing has improved, in fact our train service has declined

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.: Infrastructural changes need to be in place before 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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.: It's unclear if the draft local plan was developed in a legally compliant way. As a member of the public, withou legal knowledge, I do not feel qualified to make a comment in 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.: A petition signed by over 500 residents and accompanying e.mails setting out the objections was not submitted via Common Place. EDDC did NOT report vital comments to the Strategic Planning Committee, effectively ignoring local views.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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 developments by the EDDC is totally disproportionate compared to local needs. Devon Commmunities Together identified a local need for only 13 dwellings up to the year 2027. Feniton 05 more than covers this.

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.: At the 2014 Super Enquiry the Planning Inspector determined, with EDDC agreeing, that Feniton was NOT a sustainable location for further development. Despite this this a further 50 houses were built at eastern end of

the village, exacerbating an existing flood problem, which is only now, 10 years later, being addressed. As I understand it the flood alleviation scheme is designed to cope with the existing problems and north for further developments and will likely just push the problem further towards Patterson Cross which will push traffic to find access to Feniton through the Old village. Any increase in traffic is also a big problem. Some treat Feniton as a cut through from the old A30 through Payhembury to the M5 at Cullompton. Whichever way you come into Feniton the roads are often single track with no pavements. This was tested lately with the closure of Ottery Road/Green lane for the Flood alleviation Scheme. All traffic had to come through the old village for the month of January, i.e., numerous heavy vehicles for the flood work, school buses, local farm agricultural machinery, delivery vehicles and residents often causing total chaos whilst larger vehicles had to work out who would or could reverse! Even though access into the village is now back to "normal" this corner is still a bottleneck and narrows into Green lane over two humped narrow railway bridges which EDDC and Ottery Council consider suitable for a commercial site without allowing Feniton Parish Council to voice legitimate concerns as it is technically in Ottery St. Mary Parish. Since it only affects Feniton this was totally undemocratic and an abuse of process.

I would therefore strongly suggest the total removal of Ottery 20 from the draft plan and the removal of Feniton 08, or at least a substantial reduction in the number of houses. As is well documented , the schools and the doctors are excessively oversubscribed. Also , with the advent of Cranbrook, Feniton had the rail timetable reduced significantly and buses are few and far between, increasing the number of cars on these unsuitable roads.

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

Proposal:

5. Development in the Towns and Villages

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

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

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

SD20

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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?: 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. Wording of question 'Is it legally compliant?', seems an odd question for the lay person to comment on. 'Is it reasonable?', which our law is based on, then no. When reviewing the proposed allocated sites alongside those already adopted in the 2020-2031 plan there is a clear over concentration of development within this area of the village.

2. General policy process. Why is the policy being extended to 2042 having only recently reviewed and commented on the 2020-2031 neighbourhood plan? These development sites need to be considered holistically and the two part process seems a way of 'back door' policy making.

3. Over complication of headings. To be read in conjunction with comments made elsewhere and moved to appropriate heading 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.:

1. Not for me to rewrite policy.

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

3(b). If no, please give details 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. Development of the village The development of the village may be best served by a more organic approach, using the many infill sites available rather than developer led site allocations.

2. Metrics Please provide evidence why the metrics used to support the policies could not have been accommodated by using the existing housing stock as there seems to be many opportunities for upsizing and downsizing currently available.

3. Safe access to allocated sites Whilst appreciating the strategic level of the policy document, I find it difficult to understand how sites can be allocated for development without the support of a safe access strategy. All sites, those adopted HD3 and HD4 together with these new potential sites, Kilm 09b and 10, all have non-compliance issues, increasing risk.

4. Over complication of headings. To be read in conjunction with comments made elsewhere and moved to appropriate heading if required.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be 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. Not for me to rewrite policy.

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.:

1. Over complication of headings. To be read in conjunction with comments made elsewhere and moved to appropriate heading if 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.:

1. Not for me to rewrite policy.

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

SD25

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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

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 believe that the land designated in Plymtree is compliant with the following…Paragraph 115 of the NPPF requires it to be ensured that safe and suitable access can be achieved for all users and paragraph 116 also states that development should be refused where it would have an unacceptable impact on highway safety.

SD26

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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

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

SD28

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD28

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.: If

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 part of the development of the villages chapter/policy helps satisfy the urgent need for more sustainable housing within our area.

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

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD28

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 wish to support the legal compliance of this section as both sites are in a sustainable location.

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)

SD29

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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

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

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

-Trees and Wildlife Habitat - the site should be proected by PB03 - protection of irreplacable habitats and important features - the site contains specimen trees protected by TPOs and a unique oak tree that appears in Wisden (as the site is the former cricket ground)

- The site is on a flood plain

- The site was designated a Land of Local Importance in 1995

-Traffic and safety - the site has been rejected many times over the last 30 years because of highways and traffic issues which will be much worse now than 30 years ago

-There are better sites available in Whimple at London Road

-Whimple alreasy has 1500 houses allocated to it as part of Cobden's expansion - its is far too many for a small village with single track 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.: Whimple_11 should be removed 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

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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Whimple Parish Council has sent a detailed objection which I support and wish to repeat 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.: The site should be removed in entirety as the proposal is not based on sound evidence

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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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

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

3(b). If no, please give details of 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 houses to this land is a nonsense for all the reasons set out by Whimple Parish Council in its letter to EDDC which I endorse and repeat 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.: Remove the allocation of site Whimple 11 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

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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

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

3(b). If no, please give details 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 all the reasons set out in detail in the objection of Whimple Parish Council. In particular I want to draw to the Planning Officers' attention the fact that the landowner does not own the strip of land that runs along the front of the site which contains a protected Devon Bank and mature trees and hedgerows. Neither does the landowner own the land to the other side of the entrance to the site. I attach a copy of the Land Registry map for this site as evidence of this fact. As can be seen, the landowner only owns a narrow strip of land that forms the current entrance to the site from the highway and is wide enough only for a single car at most. The landowner is unable to legally widen this access as they do not own the land either side of this narrow strip, which is in any event a protected Devon Bank. The allocation of the land for development is fundamentally flawed on this basis alone, as well as all the reasons set out in Whimple Parish Council's extensive objection.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful 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 Whimple site11 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)

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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.: Objection on the grounds of soundness in that the allocation and policy is not based on solid evidence

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

3(b). If no, please give details 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 all the reasons set out in Whimple Parish Council's response to the consultation including (but not limited to):

-the site has been put forward and rejected on multiple occasions since 1995 because it is a fundamentally unsuitable sit

-The site contains several large specimen trees that are legally protected and one which is unique and appeared in Wisden

- the DEFRA website shows it to be a Woodland Priority Habitat and Woodland Improvement Area and a national habitat and network enhancement zone 1

-Therefore development would be contrary to EDDC Policy PB02 which is there to protect such sites from development

-It is a flood risk area and development would be contrary to Policy AR01: flooding

-The site was considered unsuitable in 1995 due to traffic and highways issues - some 30 years later the road will carry far more traffic than then and there are more houses and so more pedestrians: clearly it is EVEN MORE DANGEROUS now than 30 years ago

-The owners of the land cannot legally make an access to the site since they do not own the land or hedge (which is a PROTECTED DEVON BANK) either side of of the single track farm gate into the field

-It was designated a Land of Local Landscape Importance in 1993 and so development would be contrary to Policy OL06: Local Green Space

-Spatial Strategy: the Whimple Housing Survey as part of the Neighbourhood Plan evidences that Whimple does not need 33 new houses on this site or at all. Whimple already has 1500 homes coming under the Cobdens Expansion 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 Whimple 11 from the Local Plan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns 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

6.1

Proposal:

6. Mitigating Climate Change

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

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

6.1

3(c). Please set out the modification(s) you consider necessary to make this part of the Mitigating Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Mitigating Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Tetlow Planning as an agent on behalf of the South West Housing Association Planning Consortium (SWHAPC)

The Housing Associations of the SWHAPC recognise the critical role that they play in ensuring that residents have safe, secure and efficient homes that are future proof. Promoting sustainable development is the core objective of the plan system and it is important that all new developments continue to support this aim. This was emphasised in the Written Ministerial Statement on energy efficiency and environmental standards from December 2023. However, we urge the Council to carefully consider how these policies might affect the viability of development, as they could potentially limit the availability of affordable housing in East Devon. Climate change policies should be carefully considered against Building Regulations and the Future Homes Standard 2025 to avoid duplication and any potential inconsistencies.

Proposal:

6. Mitigating Climate Change

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

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

6.1

3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.: The Housing Associations of the SWHAPC recognise the critical role that they play in ensuring that residents have safe, secure and efficient homes that are future proof. Promoting sustainable development is the core objective of the plan system and it is important that all new developments continue to support this aim. This was emphasised in the Written Ministerial Statement on energy efficiency and environmental standards from December 2023. However, we urge the Council to carefully consider how these policies might affect the viability of development, as they could potentially limit the availability of affordable housing in East Devon. Climate change policies should be carefully considered against Building Regulations and the Future Homes Standard 2025 to avoid duplication and any potential inconsistencies.

CC02

Proposal:

6. Mitigating Climate Change

1. To which part of the Mitigating Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: CC02

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

3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.: [Tetlow King Planning represents the South West Housing Association Planning Consortium (SWHAPC) which includes leading Housing Associations (HAs) across the South West.]

Chapter 6. Mitigating Climate Change, and Chapter 7. Adapting to Climate Change The Housing Associations of the SWHAPC recognise the critical role that they play in ensuring that residents have safe, secure and efficient homes that are future proof. Promoting sustainable development is the core objective of the plan system and it is important that all new developments continue to support this aim. This was emphasised in the Written Ministerial Statement on energy efficiency and environmental standards from December 2023. However, we urge the Council to carefully consider how these policies might affect the viability of development, as they could potentially limit the availability of affordable housing in East Devon. Climate change policies should be carefully considered against Building Regulations and the Future Homes Standard 2025 to avoid duplication and any potential inconsistencies.

7

Proposal:

7. Adapting to Climate Change

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

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

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: Yes

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: Yes

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

4(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Climate change is a ***** scam

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

7.1

Proposal:

7. Adapting to Climate Change

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

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

7.1

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: The Housing Associations of the SWHAPC recognise the critical role that they play in ensuring that residents have safe, secure and efficient homes that are future proof. Promoting sustainable development is the core objective of the plan system and it is important that all new developments continue to support this aim. This was emphasised in the Written Ministerial Statement on energy efficiency and environmental standards from December 2023. However, we urge the Council to carefully consider how these policies might affect the viability of development, as they could potentially limit the availability of affordable housing in East Devon. Climate change policies should be carefully considered against Building Regulations and the Future Homes Standard 2025 to avoid duplication and any potential inconsistencies.

AR02

Proposal:

7. Adapting to Climate Change

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR02

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

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

Objection is raised to this policy. East Devon is not a water stress area so the justification for limiting water usage for new development is questionable. Water consumption is a matter covered by the Buildings Regulations regime. This limits water consumption to 125 litres per person per day.

3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A local plan policy on water efficiency is unnecessary.

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

AR03

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: I attach a response in relation to Strategic Policy AR03 regarding the CCMA (Coastal Change) prediction which covers all our coast in East Devon. However, although this is the accepted erosion rate for East Devon, the line of erosion of East Cliffs, Sidmouth has been most challenging to determine. This is because the various engineering changes carried out in the last 300 years on the Cliffs and Sidmouth Beach front, have affected the natural erosion rates on the East Cliffs. As this section will be again subject to engineering works in the form of an island or super-groyne and a substantially increased beach profile when the planned Sidmouth and East Beach's Beach Management Scheme is completed.

This is technical review of the data that has been shared with me to help explain that the erosion rate needs to be reviewed at this specific section. As the Ward Member with East Cliffs in my Ward, I am concerned that Strategic Policy AR03 is too blunt an approach to the issue and as drafted will have a significant detrimental effect upon properties and residents, not just immediately above East Cliffs, but also behind them too for several hundred metres for many decades to come. This will negatively and immediately impact the lives of residents living there as a result of the Policy as drafted.

I attach a response in which I support either a change to the predicted line, taking into account all the relevant data, and/or inserting a simple message on the map that this area will be subject to change following the introduction of the Beach Management Scheme.

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.:

1. The CCMA should not be imposed because:

a. It unnecessarily restricts what householders can do with their own properties. Certainly, warn them during the Planning phase that the property may be subject to cliff erosion in the coming years, but do not stop them from extending or re-building as they see fit. They are entitled to “peaceful enjoyment of their possessions” (ECHR).

b. The evidence on which the rate of erosion is based is not solid. There have been at least three different analyses of erosion rates - Beach Management Plan (BMP 2016), Shoreline Management Plan (SMP 2010) and the University of Plymouth Study (UofP 2022) – and each has come up with very different answers. EDDC has also changed the rate of erosion it is using in the LP between drafts without adequate explanation of the scientific rationale, and the latest draft is based to some extent on the number of responses received to a previous consultation. EDDC has decided not to use the data from the Plymouth Study for periods over 100 years. This is further evidence that the erosion rates being used are unreliable at best. The best available information on erosion rates has not been used. The Local Plan should use the Beach Management Plan data which appears to be the most reliable for all time periods over the next 100 years

c. Living on Cliff Road, we understand the rates of erosion better than any academic who has not even visited the area. The rates in the UofP study are greatly exaggerated and will have far reaching impacts for every resident.

d. EDDC has repeatedly failed to implement sea defences to protect East Cliffs following the increased erosion brought about by the prior town sea defence work in 1995. EDDC also failed to undertake the East Beach replenishment work that was promised that would have alleviated some of the erosion. In 2016 EDDC completed their Beach Management Plan – which took 4 years to complete. No action has resulted in the subsequent 9 years since 2016.

e. No account has been taken of the Beach Management Scheme (BMS) currently underway which will reduce the rate of erosion such that no properties will be at risk of cliff erosion in the next 100 years. The Environment Agency committed £16.5M to the Beach Management Project in 2023. This matters as these works will significantly alter the CCMA.

2. If, even so, the CCMA is imposed, then:

a. It should not restrict householders from extending or re-building their properties as they wish

b. It should state that once the BMS has been implemented the CCMA will be eliminated from the LP.

c. It should include a provision to commit to actively monitoring the coastal erosion retreat rates and updating future shoreline positions using the most recent retreat rates.

d. It should include a provision to commit to adjusting the content of this part of the LP at regular intervals (annually?) to take into account the progress of the EA funded sea defence work (the BMS) that is underway and its impact on predicted erosion rates.

2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See answer to 2 (b)

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Adapting to Climate Change chapter, please use this box to set out your comments.: See answer to 2 (b)

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: See answer to 2 (b) and it misinterprets the purpose of a CCMA. The national guidance states that "The national approach to planning for coastal areas can be summarised as avoiding development in vulnerable areas". This would be relevant where a new housing development is planned for an area which would be in the sea within 20 years, but I doubt if the guidance was expected to be applied where it only affects a few existing individual households.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate 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 the Ward Member for Sidmouth Rural which has properties that will be significantly negatively affected by Policy AR03

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.: I do not feel the LP enables me to enjoy 'peaceful enjoyment of my possessions' in accordance with the ECHR

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: As a resident of Cliff Road we have a right to be treated like all other property owners and at least be allowed to submit a planning application. I do not understand how you are permitted to deny us this opportunity.

I do not feel the University of Plymouth study accurately represents the erosion rates and it is significantly different from other studies. I feel the rates used in the BMP are more accurate based on my own observations over the last 35 years of living with the cliff in my garden.

I strongly submit that the Sidmouth CCMA should be withdrawn from the LP.

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The authors of the University of Plymouth study have not consulted with or visited the homeowners in Cliff Road.

Furthermore, I suspect you may be using the CCMA to your own advantage.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate 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 value of my property is at stake.

8

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 8

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: The issue comes if legal compliance changes which it is at the moment at a very dramatic rates

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Not sure

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: It is way to flimsy in its approach and it does not seem to meet the reginal and national levels of housing in any shape or form.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There just needs to be a massive boost and push for housing in the area as a whole. The figures being talked about do not go anywhere near the national requirements

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There just needs to be a massive boost and push for housing in the area as a whole. The figures being talked about do not go anywhere near the national requirements and as I understand it this is a fundamental part of the national house building plan and so it must meet set requirements which I cannot see this document does

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

HN01

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

This policy is supported in principle and the need for new housing developments to meet existing housing needs is acknowledged – this is a requirement for the achievement of sustainable development, as set out in paragraphs 7 and 8 of the NPPF. We also welcome the recognition that up-to-date local housing need evidence assessments can be referenced when assessing existing and future housing need.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To this end, we consider that the Plan should include housing allocations that deliver 100% of the housing needs of East Devon, rather than only 80%.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

HN02

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: [Tetlow King Planning represents the South West Housing Association Planning Consortium (SWHAPC) which includes leading Housing Associations (HAs) across the South West.]

Draft Strategic Policy HN02: Affordable housing Draft Strategic Policy HN02 outlines that affordable housing will be required on all developments, unless exempted under this policy, with a capacity of 6 or more dwellings in designated rural areas and 10 or more in non-designated rural areas. The SWHAPC considers this to be an appropriate policy requirement and in accordance with the NPPF. The draft policy also outlines that 25% affordable housing will be required on qualifying developments in Axminster, and 30% affordable at all other local plan allocated sites (except Axminster). A 35% affordable housing requirement is placed at any site allocated for development at the West End, any allocated site in Sidmouth and Budleigh Salterton, as falling within the settlement boundaries, and any windfall site across any part of East Devon, inside or outside settlement boundaries, that is not allocated for housing development. The SWHAPC note that this is a reduction in the current Local Plan policy, outlined at Strategy 34, which states that areas outside of those listed (Axminster, Exmouth, Honiton, Ottery St Mary, Seaton and major strategic 'West End' development sites) will be subject to a 50% affordable housing requirement. The SWHAPC request that this 50% affordable housing requirement for qualifying sites remains within the Local Plan to ensure that affordable housing is maximised within the District. 3 Draft Strategic Policy HN02 states the tenure split to be flexible in Axminster, and in all other areas the draft policy seeks 65% social rent and 35% intermediate or other forms of affordable housing. Further clarification is sought on the 65% social rent aspect and how this applies to both affordable rented and social rented housing. Additional clarification is also required on the 35% 'intermediate or other forms of affordable housing', i.e. is this referring to shared ownership affordable housing, or First Homes2. Given there is no

mention of First Homes at all within the consultation document, it is assumed that the Council is not seeking this tenure of affordable home and will not object in principle to applications that do not propose First Homes. Furthermore, in stating 'other forms of affordable housing', does the Council mean part (d) of the national definition of affordable homes in Annex 2 of the NPPF, or does it simply mean other forms of affordable housing, such as affordable rent? Draft Policy HN02 part (a) adds that affordable housing secured through policy must "Remain affordable in perpetuity". National policy only makes one reference to securing affordable housing in perpetuity, which is in reference to rural exception sites in Annex 2 of the NPPF (December 2024): "Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing…." (Emphasis added) This principle with regard to rural exception sites is appropriate and supported by the SWHAPC as it helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported. However, a blanket approach to securing affordable housing in perpetuity can cause issues for several reasons. Firstly, it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. As such, affordable housing should only be secured in perpetuity on rural exception sites. The SWHAPC recommends that, in line with national planning policy, the policy wording is changed to only relate to rural exception sites. Draft Policy HN02 part (b) adds that affordable housing "Be provided on-site and dispersed in small clusters across the site in a way that is indistinguishable in terms of design and materials from any market housing". There is no guidance as to what size of site this applies to, and how 'small' these clusters should be. It should be noted that this pepper potting approach has practical implications for housing associations when it comes to the management of their housing stock. It is also worth considering that there may be developments that are proposed as 100% affordable, which could be hindered by the wording used in the policy text.

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Tetlow Planning as an agent on behalf of the South West Housing Association Planning Consortium (SWHAPC)

Draft Strategic Policy HN02 outlines that affordable housing will be required on all developments, unless exempted under this policy, with a capacity of 6 or more dwellings in designated rural areas and 10 or more in non-designated rural areas. The SWHAPC considers this to be an appropriate policy requirement and in accordance with the NPPF.

Draft Policy HN02 part (a) adds that affordable housing secured through policy must "Remain affordable in perpetuity". National policy only makes one reference to securing affordable housing in perpetuity, which is in reference to rural exception sites in Annex 2 of the NPPF (December 2024): "Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing…." (Emphasis added) This principle with regard to rural exception sites is appropriate and supported by the SWHAPC as it helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: However, a blanket approach to securing affordable housing in perpetuity can cause issues for several reasons. Firstly, it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. As such, affordable housing should only be secured in perpetuity on rural exception sites. The SWHAPC recommends that, in line with national planning policy, the policy wording is changed to only relate to rural exception sites.

Draft Policy HN02 part (b) adds that affordable housing "Be provided on-site and dispersed in small clusters across the site in a way that is indistinguishable in terms of design and materials from any market housing". There is no guidance as to what size of site this applies to, and how 'small' these clusters should be. It should be noted that this pepper potting approach has practical implications for housing associations when it comes to the management of their housing stock. It is also worth considering that there may be developments that are proposed as 100% affordable, which could be hindered by the wording used in the policy text.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The draft policy also outlines that 25% affordable housing will be required on qualifying developments in Axminster, and 30% affordable at all other local plan allocated sites (except Axminster). A 35% affordable housing requirement is placed at any site allocated for development at the West End, any allocated site in Sidmouth and Budleigh Salterton, as falling within the settlement boundaries, and any windfall site across any part of East Devon, inside or outside settlement boundaries, that is not allocated for housing development. The SWHAPC note that this is a reduction in the current Local Plan policy, outlined at Strategy 34, which states that areas outside of those listed (Axminster, Exmouth, Honiton, Ottery St Mary, Seaton and major strategic 'West End' development sites) will be subject to a 50% affordable housing requirement. The SWHAPC request that this 50% affordable housing requirement for qualifying sites remains within the Local Plan to ensure that affordable housing is maximised within the District.

Draft Strategic Policy HN02 states the tenure split to be flexible in Axminster, and in all other areas the draft policy seeks 65% social rent and 35% intermediate or other forms of affordable housing. Further clarification is sought on the 65% social rent aspect and how this applies to both affordable rented and social rented housing. Additional clarification is also required on the 35% 'intermediate or other forms of affordable housing', i.e. is this referring to shared ownership affordable housing, or First Homes2. Given there is no mention of First Homes at all within the consultation document, it is assumed that the Council is not seeking this tenure of affordable home and will not object in principle to applications that do not propose First Homes. Furthermore, in stating 'other forms of affordable housing', does the Council mean part (d) of the national definition of affordable homes in Annex 2 of the NPPF, or does it simply mean other forms of affordable housing, such as affordable rent?

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Draft Strategic Policy HN02 outlines that affordable housing will be required on all developments, unless exempted under this policy, with a capacity of 6 or more dwellings in designated rural areas and 10 or more in non-designated rural areas. The SWHAPC considers this to be an appropriate policy requirement and in accordance with the NPPF.

Draft Policy HN02 part (a) adds that affordable housing secured through policy must "Remain affordable in perpetuity". National policy only makes one reference to securing affordable housing in perpetuity, which is in reference to rural exception sites in Annex 2 of the NPPF (December 2024):

"Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing…." (Emphasis added)

This principle with regard to rural exception sites is appropriate and supported by the SWHAPC as it helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The draft policy also outlines that 25% affordable housing will be required on qualifying developments in Axminster, and 30% affordable at all other local plan allocated sites (except Axminster). A 35% affordable housing requirement is placed at any site allocated for development at the West End, any allocated site in Sidmouth and Budleigh Salterton, as falling within the settlement boundaries, and any windfall site across any part of East Devon, inside or outside settlement boundaries, that is not allocated for housing development. The SWHAPC note that this is a reduction in the current Local Plan policy, outlined at Strategy 34, which states that areas outside of those listed (Axminster, Exmouth,

Honiton, Ottery St Mary, Seaton and major strategic 'West End' development sites) will be subject to a 50% affordable housing requirement.

3 Draft Strategic Policy HN02 states the tenure split to be flexible in Axminster, and in all other areas the draft policy seeks 65% social rent and 35% intermediate or other forms of affordable housing. Further clarification is sought on the 65% social rent aspect and how this applies to both affordable rented and social rented housing. Additional clarification is also required on the 35% 'intermediate or other forms of affordable housing', i.e. is this referring to shared ownership affordable housing, or First Homes2. Given there is no mention of First Homes at all within the consultation document, it is assumed that the Council is not seeking this tenure of affordable home and will not object in principle to applications that do not propose First Homes. Furthermore, in stating 'other forms of affordable housing', does the Council mean part (d) of the national definition of affordable homes in Annex 2 of the NPPF, or does it simply mean other forms of affordable housing, such as affordable rent?

Draft Policy HN02 part (a) adds that affordable housing secured through policy must "Remain affordable in perpetuity". National policy only makes one reference to securing affordable housing in perpetuity, which is in reference to rural exception sites in Annex 2 of the NPPF (December 2024):

"Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing…." (Emphasis added)

However, a blanket approach to securing affordable housing in perpetuity can cause issues for several reasons. Firstly, it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. As such, affordable housing should only be secured in perpetuity on rural exception sites. The SWHAPC recommends that, in line with national planning policy, the policy wording is changed to only relate to rural exception sites.

Draft Policy HN02 part (b) adds that affordable housing "Be provided on-site and dispersed in small clusters across the site in a way that is indistinguishable in terms of design and materials from any market housing". There is no guidance as to what size of

site this applies to, and how 'small' these clusters should be. It should be noted that this pepper potting approach has practical implications for housing associations when it comes to the management of their housing stock. It is also worth considering that there may be developments that are proposed as 100% affordable, which could be hindered by the wording used in the policy text.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The SWHAPC request that this 50% affordable housing requirement for qualifying sites remains within the Local Plan to ensure that affordable housing is maximised within the District.

HN04

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Further Comments We would like the Local Plan to acknowledge further the role of Housing Associations in providing affordable housing in East Devon. It would be beneficial to see the Council recognise the role of Housing Associations and encourage developers to have early active engagement with Housing Associations in the preparation of planning proposals. Early engagement enables Housing Associations to have an 5 active role in the planning and design of developments to ensure that the development addresses local housing needs and meets the management requirements of SWHAPC members. It is recommended that the Council adds 'Collaboration with Registered Providers' to the delivery mechanisms for Policy H4 in the monitoring section of the draft Local Plan. We would like to use this opportunity to highlight the successful proven track record that Community Land Trusts (CLTs) have in delivering affordable housing for local people. The Council may find it insightful to know that a number of the SWHAPC Housing Associations have delivered significant levels of affordable housing through partnerships with CLTs across the south of England. Therefore, it would be particularly useful if the Local Plan acknowledges this working relationship in order to encourage commitment in the Local Plan to support CLTs in their choice of sites.

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Draft Policy HN04: Accessible and adaptable Housing Draft Policy HN04 identifies the Council's requirements for new residential development, subject to site suitability and viability, with respect to accessible and adaptable accommodation. It outlines that 100% of all new dwellings are to meet building regulation M4(2) requirements; at least 5% of new dwellings for affordable rent are to meet building regulation M4(3)(2)(a) requirements (wheelchair adaptable); and at least 5% of all new dwellings for affordable homeownership are to meet M4(3)(2)(a or b). We accept that there is a growing need for properties which comply with current Building Regulations and so we support this policy direction, although we reiterate to the Council that the increased delivery of such properties may affect viability and overall affordable housing delivery in East Devon. Draft Policy HN04 goes on to state that with respect to M4(3) (wheelchair user housing) discussion with the Council should occur at an early stage to establish the most up-to-date information with respect to the level of local need. The SWHAPC agrees with this approach and that such requirements should be based on actual need rather than a blanket percentage requirement, considering viability and feasibility considerations

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Draft Policy HN04 identifies the Council's requirements for new residential development, subject to site suitability and viability, with respect to accessible and adaptable accommodation. It outlines that 100% of all new dwellings are to meet building regulation M4(2) requirements; at least 5% of new dwellings for affordable rent are to meet building regulation M4(3)(2)(a) requirements (wheelchair adaptable); and at least 5% of all new dwellings for affordable homeownership are to meet M4(3)(2)(a or b). We accept that there is a growing need for properties which comply with current Building Regulations and so we support this policy direction, although we reiterate to the Council that the increased delivery of such properties may affect viability and overall affordable housing delivery in East Devon.

Draft Policy HN04 goes on to state that with respect to M4(3) (wheelchair user housing) discussion with the Council should occur at an early stage to establish the most up-to-date information with respect to the level of local need. The SWHAPC agrees with this approach and that such requirements should be based on actual need rather than a blanket percentage requirement, considering viability and feasibility considerations.

HN05

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: [Tetlow King Planning represents the South West Housing Association Planning Consortium (SWHAPC) which includes leading Housing Associations (HAs) across the South West.]

Draft Policy HN05 outlines that Custom and Self-Build homes will be required on development proposals of 20 or more homes, where 5% of homes should be made available as serviced plots for sale to custom or self-builders. The SWHAPC does not currently support this element of the draft policy as the threshold of 20 homes is considered far too low. We suggest that this threshold should be increased to apply to significantly larger major housing developments, perhaps those over 500 dwellings. A policy requirement to deliver a minimum percentage of self-build units on a scheme can create challenges for Affordable Housing Providers with grant allocations. Self-Build plots are of an open market tenure; if an Affordable Housing Provider wishes to deliver a 100% affordable scheme it cannot include any open market units, otherwise it cannot secure grant funding to all plots, including the S106 policy requirement. The SWHAPC therefore ask that draft Policy HN05 includes no Custom and Self-Build requirement on 100% affordable housing proposals given that these sites are meeting much of the acute affordable housing need in East Devon. Furthermore, the SWHAPC suggests an inclusion in the policy wording which would see an order of priority for any viability challenges to ensure that custom and self-building housing is removed from schemes first before any loss in affordable housing provision is considered. The SWHAPC would welcome some clarification on how the Council will ensure that quality is maintained for the Self-Build plots. The SWHAPC advises that the Council refers to the Self-Build and Custom Housebuilding Planning Practice Guidance when formulating new policy. Draft Policy HN05 adds that on sites of over 250 dwellings or more, a proportion of plots must be made available for affordable housing, subject to viability.

The SWHAPC supports this policy as Custom and Self-Build housing can represent a further route to affordable housing within the housing market.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The SWHAPC does not currently support this element of the draft policy as the threshold of 20 homes is considered far too low. We suggest that this threshold should be increased to apply to significantly larger major housing developments, perhaps those over 500 dwellings.

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

Objection is raised to the requirement for "At least 5% of dwellings on sites planned to accommodate 20 or more homes must be delivered as serviced custom and self-build plots." Firstly, including "at least" introduces uncertainty around what the requirement will actually be in any individual case – it is vague and imprecise. Secondly, the evidence base for the local plan contains document "'HOU-017" which provides some data on self-build need but only up to October 2021 – the evidence base supporting this policy should be updated. Thirdly, 5% of dwellings on all sites over 20 dwellings appears to provide more than the required number of plots as evidenced in the self-build register data. Fourthly, some people on the self-build register will not want a plot within a larger housing scheme, as shown from the evidence base. The Council has already delivered self-build opportunities without requiring larger developments to put aside land for this type of use, predominantly on small individual sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It would be preferable for this policy to encourage this type of provision so that larger sites can concentrate on delivering affordable housing, open space, community facilities, and other infrastructure which smaller schemes cannot provide.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Draft Policy HN05 adds that on sites of over 250 dwellings or more, a proportion of plots must be made available for affordable housing, subject to viability. The SWHAPC supports this policy as Custom and Self-Build housing can represent a further route to affordable housing within the housing market.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

1. Draft Policy HN05 outlines that Custom and Self-Build homes will be required on development proposals of 20 or more homes, where 5% of homes should be made available as serviced plots for sale to custom or self-builders. The SWHAPC does not currently support this element of the draft policy as the threshold of 20 homes is considered far too low.

2. A policy requirement to deliver a minimum percentage of self-build units on a scheme can create challenges for Affordable Housing Providers with grant allocations. Self-Build plots are of an open market tenure; if an Affordable Housing Provider wishes to deliver a 100% affordable scheme it cannot include any open market units, otherwise it cannot secure grant funding to all plots, including the S106 policy requirement.

3. Furthermore, the SWHAPC suggests an inclusion in the policy wording which would see an order of priority for any viability challenges to ensure that custom and self-building housing is removed from schemes first before any loss in affordable housing provision is considered.

4. The SWHAPC would welcome some clarification on how the Council will ensure that quality is maintained for the Self-Build plots. The SWHAPC advises that the Council refers to the Self-Build and Custom Housebuilding Planning Practice Guidance when formulating new policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. We suggest that this (20 homes) threshold should be increased to apply to significantly larger major housing developments, perhaps those over 500 dwellings.

2. The SWHAPC therefore ask that draft Policy HN05 includes no Custom and Self-Build requirement on 100% affordable housing proposals given that these sites are meeting much of the acute affordable housing need in East Devon.

HN10

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN10

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy HN10 states:

"A small element of market housing may be included on any development, to provide sufficient cross-subsidy to enable the delivery of affordable homes without grant funding. However, at least 66% of dwellings must be affordable dwellings. Where grant funding is available the market housing percentage should be adjusted downward."

Para 8.49 states:

"National policy allows a small amount of market housing as a cross-subsidy to enable affordable housing delivery without grant funding. At least 66% of dwellings on exception sites must be affordable, with adjustments if grant funding is available."

The NPPF states:

"A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding."

We don't believe that 34% open market dwellings will be sufficient to cross-subsidise 66% affordable dwellings without grant. The NPPF does not state that open market homes are allowed in order to enable affordable housing delivery without grant funding; instead, it offers this as an example of one justification for open market homes being provided. The more common reason for having to provide some open market homes is to incentivise landowners to offer RESs by offering them services plots with planning consent in lieu of a land value. Under these circumstances, normal levels of grant funding is required. As drafted, does Policy HN10 allow for this?

We would suggest a less restrictive policy such as:

"Proposals for permanent affordable housing to meet an identified local need will be permitted as an exception on sites where market housing would not normally be acceptable. A small element of market housing where this will facilitate the successful delivery of the affordable housing."

4. Do you consider that this part of the Meeting Housing Needs 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)

SE02

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: ///// PART 2 - CONTINUED FROM PART 1 68148294a9ed9a0013d07f11 /////

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8. Woodbury Quiet Lanes: Several quiet routes linking Woodbury to nearby destinations were proposed by stakeholders and are shown in yellow. While there are housing sites identified in Woodbury in the current Local Plan, the absence of a major new settlement in the immediate vicinity would make securing funding for significant cycling infrastructure in this area challenging. The quite lanes could be progressed at relatively low cost through use of wayfinding and minor works to reduce motor traffic volumes and speeds to improve conditions for active travel. 52. Both schemes will require engagement between EDDC and landowners. The expansion of GBP would be well-placed to link up with these LCWIP projects, in turn supporting the sustainable use of these routes and to enhance travel to GBP by active and sustainable modes of travel. Indeed, within the Council's site assessment, under 'opportunities' it has recognised that "the site includes a significant employment site and could provide pedestrian/cycle links through it and to the wider area". 53. In addition, by locating employment growth at an existing business park with a clear demand for expansion, it will make the best use of existing infrastructure. Unlike other proposed allocations, no new major highways or infrastructure (with its associated carbon) would be required to sustainably expand GBP. 54. It is also important to note that there will in the future be a significant increase in the number of potential employees residing within active travel distance of the Greendale Business Park. The draft Local Plan currently intends to allocate land for a major new settlement in the West End of the District, immediately to the north of the Business Park. The 8,000 new homes that are anticipated to be delivered will introduce thousands of potential employees within walking or cycling distance of the business park. The proposed expansion of GBP would directly complement and help meet the employment needs of the new town and encourage the use of sustainable modes of travel between the new homes and a wider range of employment opportunities. 55. The assessment also claims that the site is 'just' within 1,600m of a bus route with an hourly

or East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 14 better service. GBP is directly served by the 58/58A bus which operates throughout the day between Exeter Bus Station and Exmouth and stops in the centre of the Business Park. For Exeter residents, this service enables employees to arrive at the Business Park on weekdays at 08:48 and leave in the afternoon at 17:19 (or earlier). For Exmouth residents, they may arrive at 08:01 and leave at 17:19 (or earlier). Further, a more frequent half-hourly service 9/9A runs between Exeter and Honiton/Seaton which serves stops at the entrance to Greendale Business Park on Sidmouth Road (A3052). Employees that live in Woodbury Salterton are approximately 800m from the centre of the business park. This is considered an acceptable distance for walking and cycling, as set out within guidance produced by the Chartered Instructure of Highways and Transportation. GBP has clear access to sustainable travel links. 56. Beyond the above, there are further opportunities to enhance the accessibility of the site as part of its expansion. Opportunities include:

• The introduction of electric vehicle charging facilities, powered by locally generated renewable energy to support travel by electric vehicles. As confirmed by the UK Government on 28 September 2023 alongside its Zero Emission Vehicle Mandate, “the switch to zero emission cars and vans will be the single biggest carbon saving measure in the UK’s journey to net zero”

• Enhanced bus transport and travel planning measures to encourage sustainable patterns of movement;

• The provision of a pedestrian footpath to connect to the bus stop of the A3052. 57. EDDC’s negative assessment of the site with regard to infrastructure and accessibility should be reviewed and re-considered in light of the above. Landscape 58. With regard to landscape, EDDC stated the below: “Medium sensitivity. The site is not in a designated landscape. Medium-Limited sense of East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 15 the site from the A3052 to the north, but views from the access road quickly become apparent showing the extensive existing business park in the foreground and fields beyond. There are open views of the site from lane (Warkidons Way) to the south, which show the built form of the existing business park set lower down the valley, along with Hogsbrook Farm buildings to east, surrounded by rural context of agricultural fields rising to the south. Similar findings for view along White Cross Road and Honey Lane - predominantly rural context, with the presence of existing business park in views to the north.” 59. The assessment report also includes a ‘Landscape Sensitivity Assessment’. This ultimately concludes: “Medium. The site is partly previously developed but this is restricted to the less visually obtrusive lower valley slopes. Further development would be more visible in short, medium and longer range views.” 60. In developing the Masterplan, landscape sensitivity, and the potential visibility of new development at the Business Park, were

assessed using LiDAR land height data and photography. A 'Zone of Theoretical Visibility' assessment was undertaken, to understand the impact of new buildings of varying heights across the business park expansion land. Views from Woodbury Salterton were also considered and assessed. 61. Visibility from key receptors was a key factor in the masterplanning of the site, and indeed landscape impact was the driving force behind the selection of the areas proposed for development. This robust exercise found that the development of Plots F1 and H (the two development areas within the reduced site boundary) could reach heights of 12m-14m before they would become visible from the National Landscape to the south of GBP. 62. It is recognised that the development of the site would change the local landscape character. To assist with integrating the expanded business park into the local landscape, additional tree planting in the forms of orchards and woodlands are proposed at the perimeter of the masterplan area to provide a natural form of visual mitigation from viewpoints in Woodbury Salterton. As noted within East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 16 the masterplan, these interventions would mitigate any perceived negative impacts on the landscape. 63. We therefore wholly disagree with the conclusions of EDDC with regard to landscape impact. Historic Environment 64. With regard to heritage, EDDC stated the below: Medium - There is evidence of prehistoric enclosure and field boundaries. An archaeological survey is needed prior to development and it may be possible to design a layout to incorporate any subterranean remains. Grade II listed Greendale Barton is located in the centre of the site, on the southern edge of the existing business park. Grade II listed Brooklands Farm is around 30m from edge of site in north west - mature trees obscure views into the site, but potential impact upon this asset. 65. Further to the above, the Council's report also includes a 'Historic Environment Site Assessment'. This ultimately concludes: "Medium: no significant effects which cannot be mitigated. An impact is predicted, but would not compromise the asset(s) cultural heritage value to the extent that the attributes that led to its designation, or ability to understand or appreciate its value, are diminished or compromised. Mitigation may make the impact acceptable. The overall significance of the asset would not therefore be materially changed." 66. As recognised within EDDC's assessment, the Business Park contains Greendale Barton, a Grade II Listed Building. This building is used as the headquarters of Greendale Group, has been directly associated with the operation of the business park for a number of years and is established within its industrial/commercial setting. The Grade II Listed Higher Greendale Farmhouse sits outside of the proposed Business Park boundary. The Masterplan was prepared with a robust understanding of the heritage assets within and near the site. At this stage it is not anticipated that the proposed expansion of the business park would cause any physical harm to heritage assets, nor would it East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 17 impact upon the significance derived from its setting due to the existing context of these buildings. 67. The Council's conclusion that there are no significant effects

which cannot be mitigated is welcome, however on that basis it appears irrational to conclude the impact would be 'medium'. At most it should be characterised as a 'minor' adverse impact. Ecology 68. Under the 'Ecology' heading, EDDC concluded: "Minor adverse effect predicted (not significant). Several TPOs cover parts of the site. Hogsbrook Farm County Wildlife Site located 131m to south." 69. The 2020 Masterplan demonstrated that the site is capable of delivering significant on-site gains in biodiversity. The preparation of the masterplan was informed by a detailed desk-based ecological study and an on-site Phase 1 Habitat Survey which found that the site mainly comprised agricultural (arable) land with low ecology value. 70. The masterplan was subsequently designed with the biodiversity metric in mind, along with the objectives of the Clyst Valley Regional Park (with specific focus on the Grindle Brook corridor). Development areas were concentrated on those parts of the site with low biodiversity value, with surrounding areas providing a net biodiversity gain through habitat creation. New habitat features were proposed, such as meadow grassland, orchards, woodland planting, wetlands, new and enhanced species-rich hedgerows, along with bird/bat/invertebrate boxes within built areas. 71. The 2024 updated boundary reduces the amount of land that would be sought for a development allocation. While the area of land sought for allocation has reduced, BNG enhancements can still be provided outside of the allocation areas, and FWS Carter and Sons have committed to providing at least 25% BNG through the development of the site if allocated. This extends beyond the statutory minimum and the draft Local Plan Policy requirement and therefore should be considered a significant positive in this regard. 72. As recognised by EDDC, the proximity to the Hogsbrook Farm County Wildlife Site is noted, though East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 18 mitigation for negative effects on these sites via financial contribution is only required by proposals that include overnight accommodation. The site, as an employment site, would not include overnight accommodation, and therefore financial mitigation would not be required from the proposal as there would be no impact. 73. As there would be no impact on the County Wildlife Site, no impact on trees subject to Tree Preservation Orders through sensitive design, and due to the potential for the development to deliver a significant net gain in biodiversity units, we consider that the development would deliver a net benefit to ecology as opposed to the minor adverse effect assumed by the Council. Other Constraints 74. Under the heading 'other constraints', the council have raised the following items: "Northern tip of site may contain Grade 2 agricultural land, but the remainder is Grade 3. A slither of Flood Zone 3 and high surface water flood risk bisects the central part of the site, east to west. Flood risk also present on western and eastern fringes. Most of site, except southern and eastern edge, is within waste consultation zone. No overhead high voltage electricity lines. High pressure gas pipeline and related safety/buffer zones lie beneath 26.8 Ha of site. Also 24.5 Ha on land with existing employment development. Discount 51.3 Ha to reduce gross development area to 20.8 hectares. Southern part of site is within (outer) water protection zone. Part of the

site (the field north of Honey Lane- approx 3.7 Ha) is within the proposed Clyst Valley Regional Park. Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan." 75. The reduced site boundary does not include any Grade 2 agricultural land and the developable areas within the expansion area are not located within Flood Zone 2 or 3 (being Flood Zone 1, low risk). The reduced site is also not located directly over a gas pipeline. The site's location within waste consultation or gas pipeline safety zones should not preclude the site being allocated for employment development – the HSE's guidance does not advise against low sensitivity land uses (such as factories) being developed within their consultation zones1 and the HSE would regardless 1 https://www.hse.gov.uk/landuseplanning/methodology.htm East Devon Local Plan Chapter 4: Development at the West End FWS Carter & Sons March 2025 19 be consulted at planning application stage if the sites were allocated. 76. Finally, in its conclusion, the Council has provided the following statement under 'Reasons for allocating or not allocating': "Countryside location remote from facilities (these are not accessible on foot and there are no cyclepaths). Landscape impact varies across the site but the least intrusive areas have already been developed and the undeveloped parts of the site will be much more visually intrusive. The position and extent of the HSE High Pressure Gas pipeline and its safeguarding zones across the central/ eastern part of the site, plus the amount of land within the Flood Zone, reduce the site capacity. Sites to the west might be achievable but they are quite visible in the wider landscape (and the least visible field is within the proposed CVRP extension) and are not well related to the existing business park." 77. As demonstrated within this representation, the site is sustainably located for its proposed use and the concerns expressed, including those regarding landscape impact, the gas pipeline, flood risk and agricultural land have all been eliminated by the reduction in the size of the expansion area as submitted in 2024. 78. In assessing the site, EDDC should also consider the substantial and significant benefits that would be provided by the expansion of GBP. The economic benefits of delivering the masterplan in full have been set out earlier in these representations.

SE05

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE05

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

This policy states that "Compliant Employment and Skills Statements must adhere to the respective requirements set out in the relevant guidance published and available online via the Council's website." That guidance does not appear to be available – it could not be found in the evidence base for the local plan. If the guidance has not been published yet, that is required before any meaningful comments can be made.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: In any event, any conditions or obligations will need to be broad and flexible enough to be achievable for larger developments to properly implement, as workforce strategies over the course of a number of years can face changing environments.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Sustainability appraisal

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: Sustainability Appraisal comments for submission:

The Sustainability Appraisal Framework must explicitly reference the Mitigation Hierarchy, which prioritizes avoidance over mitigation. This structured approach to managing environmental impacts is firmly established in several key pieces of legislation, including:

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 Failure to integrate the Mitigation Hierarchy into the site selection methodology or process is inconsistent with national policy and, therefore, fundamentally unsound. Alternative sites, identified as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting, should be allocated instead of Exmo_20.

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. The allocation of Exmo_20, a supporting habitat for foraging Nightjars, directly contradicts this objective. Moreover, Exmo_20 is located within SNA 368, which is designated as a site under the Devon Local Nature Recovery Network (LNRS) in accordance with the Environment Act 2021. Allocating this site would, therefore, undermine the strategic goal of conserving and enhancing habitats and wildlife within our natural environment. This allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting, should be selected instead of Exmo_20.

On pages 11-12, the document states:

4. Climate Change and Carbon Emissions: Development that minimizes the need to travel by providing access to public transport and cycling. The allocation of Exmo_20 fails to meet this criterion, as it is located in an unsustainable area with the primary access point leading onto the B3179, a rural country road. The site's allocation fails to align with the objective of reducing travel needs and emissions. This allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting, should be selected instead of Exmo_20.

On page 18, Figure 2.4: Site Criteria for Consideration as a "Reasonable Alternative" confirms that Exmo_20 cannot be deemed a reasonable alternative, as it failed the HELAA assessment stage and was classified as "not suitable or achievable" (HELAA Appendix E(v)1). Its allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting, should be selected instead of Exmo_20.

I strongly disagree with the conclusions drawn in the Exmouth Sites Biodiversity objective (p.331/332). Both Exmo_04 and Exmo_20 are given double negative (--) scores, yet the commentary and conclusions between the two sites are inconsistent and unjustified. Exmo_04's allocation partially falls outside the 400m zone, whereas Exmo_20's allocation runs directly adjacent to the protected site. This inconsistency is unacceptable and undermines the integrity of the assessment.

In the Exmouth Sites Historic Built Environment commentary (p.334), the assumption that the site's large size enables adverse impacts to be minimized is flawed. First, the site has significantly decreased in size since ownership was verified after the allocation on 3rd September 2024. Second, the top 400m of the site cannot accommodate housing. Third, the remaining area is only sufficient to accommodate 700 houses, making the assumption that mitigation can be effectively integrated completely unfounded. This justification lacks credibility and should not stand.

Regarding the Exmouth Sites Climate Change and Carbon Emissions commentary (p.335), I strongly object to the use of 1,600 metres as a reference distance. This figure is misleading, as it represents the total round-trip distance rather than the accepted

800m standard for walkable neighborhoods, as outlined in the Government's National Design Guide and "Sustran, Walkable Neighbourhoods." Furthermore, distances must be measured from site centers rather than the nearest point, especially for elongated sites like Exmo_20, which is over 800m long. The reliance on the incorrect distance metric compromises the validity of the assessment.

Additionally, the fact that the main access point for Exmo_20 now exits onto the B3179 country road should be considered a material concern. This site is unsustainably located, rendering its allocation inconsistent with national policy. The decision to allocate Exmo_20 is unjustified.

Alternative sites, identified as preferred within the Agenda for the 3rd September 2024Strategic Planning Committee meeting, should be allocated instead of Exmo_20.

It is astonishing that the Exmouth Sites Climate Change Adaptation commentary (p.336) fails to mention the flood risk present at the lowest end of Exmo_20. Even more concerning is the complete omission of the fact that this extensive greenfield area entirely drains into Withycombe Brook—an area with a known and significant flood risk in Exmouth. Incredibly, this critical issue has not been assessed in the Strategic Flood Risk Assessment for the draft Local Plan. The EDDC Level 1 Strategic Flood Risk Assessment – Final Report (February 2024, p.69) explicitly 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." Given the known flood risks, the Brook's route through East Devon's largest settlement, and the considerable size of the proposed Exmo_20 allocation upstream, it is simply incomprehensible that this issue has been overlooked.

Turning to the Exmouth Sites Access to Services commentary (p.338), it is baffling that a distance of 1,600 metres is used as a standard when the correct figure should be 800 metres—1,600m represents a round-trip distance, not the standard walkable distance. The Government's National Design Guide and "Sustran, Walkable Neighbourhoods" both define 800m as the standard walkable distance. Furthermore, the commentary fails to acknowledge that distances should be measured from site centres, not the nearest point—a critical consideration for Exmo_20, given that the entire site spans over 800m in length. Additionally, the fact that the main access point now leads onto the

B3179 country road is a glaring omission and should be a material consideration. Using the 1,600m figure in this context is entirely unjustified and misleading.

In the Exmouth Sites Connectivity and Transport commentary (p.340), the assertion that Exmo_20 is within 800m of the A376 is simply untrue. This claim is misleading and unjustified. Again, distances should be measured from the site center, not the nearest point. For a site as extensive as Exmo_20, this oversight is unacceptable. Moreover, the failure to recognize that the main access point is now onto the B3179 country road is yet another serious omission that should have been a material consideration. Given these glaring inconsistencies, inaccuracies, and unjustified conclusions, it is deeply concerning that Exmo_20 continues to be considered for allocation. Alternative sites, identified as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting, should be selected instead.

I strongly disagree with the conclusions presented in the Exmouth Sites commentary on page 340, which 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.” It is entirely inconsistent and unjustified that only Exmo_04 is amended to exclude the most sensitive area while Exmo_20 remains allocated despite being within the same 400-metre exclusion zone. This selective approach lacks any reasonable justification and undermines the integrity of the site allocation process. The site allocation and settlement boundary must be repositioned 400 metres from the Pebblebed Heaths.

Further, on page 342, the identification of Exmo_20 as a preferred alternative for Exmouth is fundamentally flawed. Exmo_20 was deemed “not suitable or achievable” during the HELAA assessment, and in accordance with Section 2.4 of this Sustainability Appraisal report, it cannot be legitimately considered a preferred alternative. This blatant inconsistency renders the document unjustified, unsound, and unreliable.

On page 343, the reasoning for rejecting sites states:

- Exmo_04b – Land at Marley Drive is rejected due to a major adverse biodiversity effect arising from its location within the 400-metre Pebblebed Heaths exclusion zone. This decision is entirely inconsistent with the allocation of Exmo_20, which is similarly located within the exclusion zone. It is illogical and indefensible to apply different standards to these two sites. The site allocation and settlement boundary must be repositioned 400 metres from the Pebblebed Heaths to ensure a fair and consistent approach.

The selective and inconsistent treatment of sites, the disregard for established criteria, and the flawed assessment of alternatives render the current site allocation process at EDDC unsound and unjustified.

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: The Sustainability Appraisal Framework must explicitly reference the Mitigation Hierarchy, which prioritizes avoidance over mitigation. This structured approach to managing environmental impacts is firmly established in several key pieces of legislation, including:

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 Failure to integrate the Mitigation Hierarchy into the site selection methodology or process is inconsistent with national policy and, therefore, fundamentally unsound. Alternative sites, identified as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting, should be allocated instead of Exmo_20.

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. The allocation of Exmo_20, a supporting habitat for foraging Nightjars, directly contradicts this objective. Moreover, Exmo_20 is located within SNA 368, which is designated as a site under the Devon Local Nature Recovery Network (LNRS) in accordance with the Environment Act 2021. Allocating this site would, therefore, undermine the strategic goal of conserving and enhancing habitats and wildlife within our natural environment. This allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting, should be selected instead of Exmo_20. On pages 11-12, the document states:

4. Climate Change and Carbon Emissions: Development that minimizes the need to travel by providing access to public transport and cycling. The allocation of Exmo_20 fails to meet this criterion, as it is located in an unsustainable area with the primary access point leading onto the B3179, a rural country road. The site's allocation fails to

align with the objective of reducing travel needs and emissions. This allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting, should be selected instead of Exmo_20. On page 18, Figure 2.4: Site Criteria for Consideration as a "Reasonable Alternative" confirms that Exmo_20 cannot be deemed a reasonable alternative, as it failed the HELAA assessment stage and was classified as "not suitable or achievable" (HELAA Appendix E(v)1). Its allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting, should be selected instead of Exmo_20.

I strongly disagree with the conclusions drawn in the Exmouth Sites Biodiversity objective (p.331/332). Both Exmo_04 and Exmo_20 are given double negative (--) scores, yet the commentary and conclusions between the two sites are inconsistent and unjustified. Exmo_04's allocation partially falls outside the 400m zone, whereas Exmo_20's allocation runs directly adjacent to the protected site. This inconsistency is unacceptable and undermines the integrity of the assessment. In the Exmouth Sites Historic Built Environment commentary (p.334), the assumption that the site's large size enables adverse impacts to be minimized is flawed. First, the site has significantly decreased in size since ownership was verified after the allocation on 3rd September 2024. Second, the top 400m of the site cannot accommodate housing. Third, the remaining area is only sufficient to accommodate 700 houses, making the assumption that mitigation can be effectively integrated completely unfounded. This justification lacks credibility and should not stand. Regarding the Exmouth Sites Climate Change and Carbon Emissions commentary (p.335), I strongly object to the use of 1,600 metres as a reference distance. This figure is misleading, as it represents the total round-trip distance rather than the accepted 800m standard for walkable neighborhoods, as outlined in the Government's National Design Guide and "Sustran, Walkable Neighbourhoods." Furthermore, distances must be measured from site centers rather than the nearest point, especially for elongated sites like Exmo_20, which is over 800m long. The reliance on the incorrect distance metric compromises the validity of the assessment. Additionally, the fact that the main access point for Exmo_20 now exits onto the B3179 country road should be considered a material concern. This site is unsustainably located, rendering its allocation inconsistent with national policy. The decision to allocate Exmo_20 is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September 2024Strategic Planning Committee meeting, should be allocated instead of Exmo_20.

It is astonishing that the Exmouth Sites Climate Change Adaptation commentary (p.336) fails to mention the flood risk present at the lowest end of Exmo_20. Even more

concerning is the complete omission of the fact that this extensive greenfield area entirely drains into Withycombe Brook—an area with a known and significant flood risk in Exmouth. Incredibly, this critical issue has not been assessed in the Strategic Flood Risk Assessment for the draft Local Plan. The EDDC Level 1 Strategic Flood Risk Assessment – Final Report (February 2024, p.69) explicitly 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." Given the known flood risks, the Brook's route through East Devon's largest settlement, and the considerable size of the proposed Exmo_20 allocation upstream, it is simply incomprehensible that this issue has been overlooked. Turning to the Exmouth Sites Access to Services commentary (p.338), it is baffling that a distance of 1,600 metres is used as a standard when the correct figure should be 800 metres—1,600m represents a round-trip distance, not the standard walkable distance. The Government's National Design Guide and "Sustran, Walkable Neighbourhoods" both define 800m as the standard walkable distance. Furthermore, the commentary fails to acknowledge that distances should be measured from site centres, not the nearest point—a critical consideration for Exmo_20, given that the entire site spans over 800m in length. Additionally, the fact that the main access point now leads onto the B3179 country road is a glaring omission and should be a material consideration. Using the 1,600m figure in this context is entirely unjustified and misleading. In the Exmouth Sites Connectivity and Transport commentary (p.340), the assertion that Exmo_20 is within 800m of the A376 is simply untrue. This claim is misleading and unjustified. Again, distances should be measured from the site center, not the nearest point. For a site as extensive as Exmo_20, this oversight is unacceptable. Moreover, the failure to recognize that the main access point is now onto the B3179 country road is yet another serious omission that should have been a material consideration. Given these glaring inconsistencies, inaccuracies, and unjustified conclusions, it is deeply concerning that Exmo_20 continues to be considered for allocation. Alternative sites, identified as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting, should be selected instead.

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- 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." It is entirely inconsistent and unjustified that only Exmo_04 is amended to

exclude the most sensitive area while Exmo_20 remains allocated despite being within the same 400-metre exclusion zone. This selective approach lacks any reasonable justification and undermines the integrity of the site allocation process. The site allocation and settlement boundary must be repositioned 400 metres from the Pebblebed Heaths. Further, on page 342, the identification of Exmo_20 as a preferred alternative for Exmouth is fundamentally flawed. Exmo_20 was deemed “not suitable or achievable” during the HELAA assessment, and in accordance with Section 2.4 of this Sustainability Appraisal report, it cannot be legitimately considered a preferred alternative. This blatant inconsistency renders the document unjustified, unsound, and unreliable. On page 343, the reasoning for rejecting sites states:

- Exmo_04b – Land at Marley Drive is rejected due to a major adverse biodiversity effect arising from its location within the 400-metre Pebblebed Heaths exclusion zone. This decision is entirely inconsistent with the allocation of Exmo_20, which is similarly located within the exclusion zone. It is illogical and indefensible to apply different standards to these two sites. The site allocation and settlement boundary must be repositioned 400 metres from the Pebblebed Heaths to ensure a fair and consistent approach. The selective and inconsistent treatment of sites, the disregard for established criteria, and the flawed assessment of alternatives render the current site allocation process at EDDC unsound and unjustified.

Tracey Winn, chopperthc@hotmail.com

Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: The Sustainability Appraisal Framework must explicitly reference the Mitigation Hierarchy, which prioritizes avoidance over mitigation. This structured approach to managing environmental impacts is firmly established in several key pieces of legislation, including:

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 Failure to integrate the Mitigation Hierarchy into the site selection methodology or process is inconsistent with national policy and, therefore, fundamentally unsound. Alternative sites, identified as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting, should be allocated instead of Exmo_20.

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. The allocation of Exmo_20, a supporting habitat for foraging Nightjars, directly contradicts this objective. Moreover, Exmo_20 is located within SNA 368, which is designated as a site under the Devon Local Nature Recovery Network (LNRS) in accordance with the Environment Act 2021. Allocating this site would, therefore, undermine the strategic goal of conserving and enhancing habitats and wildlife within our natural environment. This allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting, should be selected instead of Exmo_20. On pages 11-12, the document states:

4. Climate Change and Carbon Emissions: Development that minimizes the need to travel by providing access to public transport and cycling. The allocation of Exmo_20 fails to meet this criterion, as it is located in an unsustainable area with the primary access point leading onto the B3179, a rural country road. The site's allocation fails to

align with the objective of reducing travel needs and emissions. This allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting, should be selected instead of Exmo_20. On page 18, Figure 2.4: Site Criteria for Consideration as a "Reasonable Alternative" confirms that Exmo_20 cannot be deemed a reasonable alternative, as it failed the HELAA assessment stage and was classified as "not suitable or achievable" (HELAA Appendix E(v)1). Its allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting, should be selected instead of Exmo_20.

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concerning is the complete omission of the fact that this extensive greenfield area entirely drains into Withycombe Brook—an area with a known and significant flood risk in Exmouth. Incredibly, this critical issue has not been assessed in the Strategic Flood Risk Assessment for the draft Local Plan. The EDDC Level 1 Strategic Flood Risk Assessment – Final Report (February 2024, p.69) explicitly 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." Given the known flood risks, the Brook's route through East Devon's largest settlement, and the considerable size of the proposed Exmo_20 allocation upstream, it is simply incomprehensible that this issue has been overlooked.

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Proposal: Sustainability appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: All - you need to MAKE SURE the infrastructure is in place, ESPECIALLY sewage as that state of our pumping stations is not coping with current outsell let alone even more homes sewage. The sea and rivers is NOT THE PLACE for it all.