

Filtered Data Export

Full name: Andrew Tyerman, on behalf of ESCAPE

Organisation (where relevant): ESCAPE

Other party name (if relevant):

-

Proposal:

7. Adapting to Climate Change

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

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

7.4

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

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.:

[Please refer to the attachment for the full report] This representation relates to the EDDC Water Cycle Study 2025 (WCS) which in its current state is unsound and means that the Local Plan is likely not legally compliant. The basis of this is summarised below and in further detail in the rest of this document. ? 22 Feb 2024 EDDC councillors passed a motion of no confidence in South West Water (SWW) yet accepts this report which contains factual errors and omissions in the data. ? SWW itself identifies 'hydraulic capacity' as the cause of high numbers of sewage pollution incidents in East Devon yet this is not in the WCS. ? 25 November 2025 the leader of the Council described SWW as having led the council a 'merry dance' and confirmed he was unsure whether the WCS could be used as a basis for planning decisions. ? Due to delays in providing the required information by SWW there has been no opportunity for the WCS to be considered by EDDC. ? Plans to upgrade Maer Lane STW are unclear so the Environment Agency cannot commence permit changes. In order to ensure the WCS study is robust and sound, further work is required to address the errors, omissions and additional investigation into issues raised by the report. A short delay would allow this to be completed. Failure to address these matters will result in a large increase in the amount of untreated sewage being discharged into the rivers and sea in East Devon as plans for new development and sewage infrastructure improvement plans are not synchronised.

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.: [Please refer to the attachment for the full report] This representation relates to the EDDC Water Cycle Study 2025 (WCS) which in its current state is unsound and means that the Local Plan is likely not legally compliant. The basis of this is summarised below and in further detail in the rest of this document. ? 22 Feb 2024 EDDC councillors passed a motion of no confidence in South West Water (SWW) yet accepts this report which contains factual errors and omissions in the data. ? SWW itself identifies 'hydraulic capacity' as the cause of high numbers of sewage pollution incidents in East Devon yet this is not in the WCS. ? 25 November 2025 the leader of the Council described SWW as having led the council a 'merry dance' and confirmed he was unsure whether the WCS could be used as a basis for planning decisions. ? Due to delays in providing the required information by SWW there has been no opportunity for the WCS to be considered by EDDC. ? Plans to upgrade Maer Lane STW are unclear so the Environment Agency cannot commence permit changes. In order to ensure the WCS study is robust and sound, further work is required to address the errors, omissions and additional investigation into issues raised by the report. A short delay would allow this to be completed. Failure to address these matters will result in a large increase in the amount of untreated sewage being discharged into the rivers and sea in East Devon as plans for new development and sewage infrastructure improvement plans are not synchronised.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like to participate in the hearing session to outline the issues to the inspector.